

3. BUN60325798
Assessment of
Environmental Effects



KINGSGATE SCHOOL

Resource Consent Application for
Proposed Christian Primary School at 58 Blake Road, Pukekohe

August 2018



DOCUMENT CONTROL RECORD


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58 Blake Road, Pukekohe


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1. Introduction

1.1 Applicant and Property Details

Applicant Details: The Kingsway Trust

Address for Service: The Kingsway Trust
C/- CivilPlan Consultants Limited
PO Box 97796, Manukau 2241

Site Address: 58 Blake Road, Pukekohe

Legal Description: Lot 1 DP 23377, Lot 2 DP 23377, Lot 3 DP 23377 & Lot 4 DP 23377

Site Area: 8.18 hectares

Site Owners: The Kingsway Trust

Relevant Plan: Auckland Unitary Plan Operative in Part ('AUP')

Zoning: Rural – Countryside Living Zone

Precinct: Pukekohe Hill sub-precinct B

Overlays: Natural Resources: High-Use Aquifer Management Areas –
Pukekohe Kaawa Aquifer
Natural Resources: High-Use Aquifer Management Areas –
Pukekohe Central Volcanic
Natural Resources: Quality-Sensitive Aquifer Management Areas –
Franklin Volcanic Aquifer

Controls: Macroinvertebrate Community Index - Rural

Designations: N/A

1.2 Purpose of the Report

This report has been prepared for resource consent to authorise the establishment of a Christian Primary School at 58 Blake Road, Pukekohe.

This application is made pursuant to section 88 of the Resource Management Act 1991 (RMA) which requires that the application include an assessment of environmental effects in accordance with Schedule 4 of the RMA and be in such detail as corresponds with the scale and significance of the effects that the activity may have on the environment.



To accord with the Schedule 4, clause 2 requirements (for information that must be included in an application) this document (and the relevant Council application forms) contains the following:

- A description of the activity;
- A description of the site;
- Identification of the owner of the site;
- A description of the required resource consents (and identification of Permitted Activities to accord with Clause 3);
- An assessment of the activity against the matters set out in Part 2 of the RMA;
- An assessment of the activity against any relevant provisions of a document referred to in section 104(1)(b) of the RMA;
- An assessment of the activity's effects on the environment.

1.3 Limitations

This report has been prepared for The Kingsway Trust, for the specific purpose of satisfying the statutory information requirements under the Resource Management Act 1991 for a resource consent application to Auckland Council.

2. Background

KingsGate School is a state integrated Christian school in Victoria St, Pukekohe that has been in existence for over 25 years. The Kingsway Trust is the Proprietor for KingsGate School. The Trust is also the Proprietor for KingsWay School in Orewa, Horizon School in Snells Beach and Jireh School in Avondale. All are state-integrated, special character, Christian schools.

The Chief Executive Officer of the Trust has provided a summary of the current school activity and future plans, which is attached at Appendix 3. As set out in that statement, KingsGate School currently has 110 students on the roll, aged Year 1-8. As it is an integrated Christian school with a Special Character, enrolments are limited by the school's Integration Deed, 95% of whom must be 'preference', ie. support the special character criteria of the school.

The current site (leased) is 'at capacity' and the school has been looking for a suitable alternative for some time. In discussion with the Ministry of Education, Kingsway Trust purchased the subject site for the relocation and development of the school. The school estimates that they will require the additional classroom space facilitated by this application by 2020, at which time they expect the role to be 150 students. It is not possible to expand the existing school due to site constraints, and obtaining a site of sufficient size to accommodate a school of up to 450 children (as sought through this application) in order to achieve the above timeframe has proven a challenging task for the school.

To date an earthworks resource consent has been lodged with Council to enable earthworks required to facilitate the development of the school. This consent is currently being processed, Council Reference (LUC60323268).



3. The Subject Site

The subject site is located at 58 Blake Road, Pukekohe. The site is currently comprised of four allotments; three of which are held together in one Title, as detailed in the Table 1.

Table 1: Legal Description

Legal Description	Certificate of Title	Area
Lot 1 DP 23377	NA623/55	1.897ha
Lot 2 DP 23377	NA624/253	6.2837ha
Lot 3 DP 23377	NA624/253	
Lot 4 DP 23377	NA624/253	

A locality diagram is attached as Appendix 1 and a copy of the Certificates of Title are attached as Appendix 2. The subject site has a total area of 8.18 ha.

The subject site is located on the corner of Blake Road and Foy Road in the south-western area of Pukekohe. The site sits on the north-western slopes of Pukekohe Hill and is generally surrounded by land in agricultural use on all sides. The site is zoned Rural – Countryside Living zone but is located adjacent to the Pukekohe Rural Urban Boundary; the adjacent land to the north and east having a Residential – Single House zoning.

The site has a gentle slope down from its southern corner to its northern corner, being almost square in shape. The site is currently used for agricultural purposes. One dwelling is located on the site in the southern corner, with access from Blake Road. Dwellings on neighbouring sites are currently located over 80m from the site. However, development of the residential zoned land is occurring one block from the site currently and is anticipated to extend to the neighbouring residential zoned land in the near future to meet market demand.

There are hedges located along the Blake Road boundary of the site and returning along the southern site boundary adjacent to the dwelling for part of that boundary, and three rows of hedging dividing the site internally. Some larger specimen trees are located around the existing dwelling.

4. Project Description

This application seeks to establish a special character (Christian) primary school at the subject site. The school will replace the existing KingsGate School, with all existing school operations moving to the new site when it is ready. The target completion date for the move is January 2020.

It is proposed to establish all facilities required for a Primary school of up to 450 students, aged school Year 1-10. This includes classrooms, outdoor courts and fields, and parking, pick up / drop off and access areas. In addition it is proposed to establish an early childcare facility on the site for up to 60 children to complement the school activity. It is expected that many families will have children attending both the childcare facility and the school, providing a convenient option for parents.

The proposed activities are summarised as follows:



- Three open plan classrooms for teaching space (accommodating up to 450 children);
- One administration block including school hall and library;
- Two hardcourts and two playing fields;
- One building containing the early childcare centre, with associated outdoor play area;
- Pick up and drop off area comprising 42 parking spaces, also available for visitor parking during the day;
- Staff parking comprising 38 parking spaces, which will also include spaces for PUDO for the early childcare centre.

The different aspects of the proposal are outlined in the following sections.

4.1 Site Layout

The site layout for the proposed school has been designed taking into account the contextual location of the site, on the edge of the Rural Urban Boundary, with Residential zoned land located to the east and southeast of the site and Countryside Living zoned land to the northwest and northeast of the site. The site contours (sloping down from Blake Road from south to north) and suitable arrangements for site access have also been taken into account.

Due to the topography of the site, the only practical access and carpark area for the number of carparks required to service the activity is from and near Blake Road. There is too much fall to achieve suitable access gradients to Foy Road. Therefore all vehicular access to the site is from Blake Road.

The buildings have been located in the southeastern part of the site, closest to the Rural Urban Boundary and the interface with future residential development. This maintains the buildings in relatively close proximity to the parking areas and maintains grassed and open areas at the rural (Countryside Living) zoned interfaces with the site. This creates a natural buffer and separation of approximately 130m-140m between the school buildings and horticultural activities occurring on neighbouring sites to the south and west.

The yard setbacks for the proposed buildings ensure that acoustic effects associated with the use and operation of the buildings and carpark areas will be contained within the site.

The playing fields have been located in the northeastern part of the site. They have been designed to maximise flat playing space available, whilst also taking into account the sloping contour of the site. A stormwater attenuation area has been accommodated in the northern corner of the site, being the area with the lowest contour so that the whole site drains to this area.

Effluent disposal fields will be accommodated in the southwestern part of the site near the site boundaries.



4.2 Staging

It is proposed to establish the school in two stages, as detailed on the site plan attached at Appendix 4 and the staging plan attached at Appendix 6 (drawing 2007-01-110).

Stage 1(a) will comprise two of the proposed classrooms, with administration areas contained within one of the classrooms. This stage will also include establishment of all parking and access for the site and free-standing signage. It is expected that Stage 1(a) will cater for up to 190 children.

Stage 1(b) will comprise the construction of carpark 2, to enable the number of students accommodated within the two classroom buildings to increase to 300 children.

Stage 2 will comprise the third classroom, the administration block and the early childcare centre, increasing the school capacity to 450 children, plus the 60 children childcare centre. Stage 2 will not progress until required to meet roll growth, which is estimated to be approximately 5 years after the completion of Stage 1(a) and (b).

The proposal is outlined in further detail as follows.

4.3 Buildings

4.3.1 School

The school comprises of four buildings; three buildings comprising classrooms and one comprising administration activities (including hall, library and staffroom).

The classrooms have been designed taking into account the existing rural setting of the school and have been designed to reflect characteristics of typical farm buildings, both in terms of the size and scale, roof form and materials. The buildings are single storey (max height of 7.1m) and have been positioned to sit within the landscape of the site, aligned with the existing site contours.

The administration building has been located near the vehicle entrance to the site from Blake Road and in a location where some visibility of the building will be achieved from Blake Road for site legibility. Due to the grade of the contour sloping down from Blake Road, views to other buildings within the site from Blake Road will be limited. The administration building will be single level and has also been designed to reflect rural building characteristics.

The design considerations for the school are further articulated in the design statement attached at Appendix 5.

4.3.2 Early Childcare Centre

The Early Childcare Centre building will be constructed as part of the Stage 2 works. The building has been located near Foy Road and in a location easily accessible from proposed parking areas.

The outdoor play space for the childcare centre is shown on the site plan and will be fenced with pool-style permeable fencing. This will be fitted out with play equipment and will be finished with a rubber, turf, or other suitable play surface.



4.4 Parking and Access

4.4.1 Access

Vehicular access to the site will be direct from Blake Road, from where the site currently gains physical access. Two new vehicle crossings are proposed; both one-way. The crossing near the centre of the site boundary will provide for vehicles entering the site and the crossing near the northern site boundary will provide for vehicles exiting the site.

During the design and feasibility phase for the project, additional access from Foy Road was also considered. Taking into account the sloping contour of the site and the design grades required for parking and access areas, vehicle access from Foy Road was discarded as being impractical and unfeasible. Therefore, no vehicle access is proposed from Foy Road.

The Traffic Report prepared in support of the application by Commute Transportation Specialists is attached at Appendix 10 and provides a full assessment of the proposed site access arrangement, including manoeuvring for all vehicles expected to utilise the site (cars, busses etc.).

Pedestrian access to the site is proposed to be from Foy Road rather than Blake Road. This is proposed to separate pedestrian movements from vehicle movements entering and exiting the site and provides a more direct pedestrian access from the footpath proposed along Blake Road, which will extend to the existing footpath in Rowles Road (refer Section 4.4.3 below).

4.4.2 Parking

A total of 80 parking spaces are proposed. It is noted that this is well in excess of the AUP requirement for 0.5 spaces per FTE staff member plus one visitor park per classroom for the school and 0.1 spaces per child and 0.5 spaces per FTE for the childcare (which would equate to a requirement for 40 carparks).

The carparks proposed will provide sufficient capacity for staff parking, visitor parking and Pick-Up Drop-Off (PUDO) parking during morning and afternoon peak periods. This is outlined in further detail in the ITA attached at Appendix 10.

Cycle parking is also proposed. It is noted that the development requires 4 short stay and 25 long stay cycle parks to service the development (of which 2 short stay and 15 long stay parks are required for stage 1). Cycle parking is proposed adjacent to the carpark; a total of 30 spaces being provided. It is expected that this will encourage older children to cycle to school (particularly with the footpath connection completed through to Rowles Road providing a safe cycle route along Blake Road).

4.4.3 Road Upgrading Works

To facilitate safe and efficient access to the site, taking into account the existing rural road environment adjacent to the site, it is proposed to undertake some localised road upgrading works. This work specifically comprises:

- Widening of Blake Road adjacent to the site to accommodate a right turn bay at the entrance to the school;



- Upgrading of the Foy Road intersection to safely accommodate cars and trucks utilising this intersection with sufficient manoeuvring space;
- Upgrading of the Blake Road berm adjacent to the site comprising kerb and channel and piping of the table drain.
- Upgrading the Blake Road berm to the north of the site to accommodate a footpath along the eastern side of the road. It is not proposed to kerb and channel this portion of the road, as it is envisaged that full upgrade of this berm will occur at the time that the adjacent site is developed for residential activities in accordance with its zoning.

The scope of the proposed works is outlined on the Engineering Plans attached at Appendix 6. Intersection tracking for the intersections of Blake Road with Foy Road and Calcutta Road is addressed in the Transport Assessment attached at Appendix 10. The assessment confirms that tracking for cars and heavy vehicles can be achieved at both intersections in a satisfactory manner to ensure the safe operation of those intersections.

All works can be accommodated within the existing road reserves.

4.5 Servicing

4.5.1 Stormwater

The subject site falls within the area of the Pukekohe - Tutaenui Stream Catchment and its Network Discharge Consent. Stormwater control requirements to comply with the NDC are set out in the Pukekohe Hill Precinct Provisions. The proposed development has been designed to meet the relevant stormwater requirements as set out below.

1. Stormwater Management within the Site

A Stormwater Report has been prepared for the site and is attached at Appendix 7. The report outlines the stormwater management approach for the site to meet the relevant Unitary Plan requirements. Overall the stormwater approach comprises:

- Diversion of upstream flows through the site around proposed buildings;
- Collection of stormwater within proposed stormwater basin at low point of site;
- Treatment of access and parking areas with Stormwater 360 stormfilters prior to discharge.

The stormwater basin has been sized to meet the retention and detention requirements for development in the Pukekohe Hill precinct, as outlined in the attached Stormwater Report. The stormwater basin will discharge via a 150mm diameter private connection and a spillway, to the entrance of an existing 1.5 m x 1.5 m diameter culvert which crosses Foy Road to the north.



2. Stormwater Management – Roads

Upgrading works within Blake Road and Foy Road will require culverting of some of the table drains along these roads to enable road widening and installation of a footpath. The required culverts will be sized to accommodate the 10 year event, with flows above the 10 year event flowing along the road, as per standard practice. Final design details of the public drainage within the road reserves and associated calculations will be provided at Engineering Plan Approval stage.

4.5.2 Wastewater

Wastewater is proposed to be managed on site via an on-site wastewater treatment system and land disposal system.

It is anticipated that the treatment device will be installed near the childcare centre and the treated wastewater pumped from there to the disposal field, which is identified in the southwestern part of the site. The wastewater disposal system has been designed in accordance with TP58 and is based on a wastewater treatment plant by Innoflow Technologies, which includes primary and secondary treatment.

Details of the proposed wastewater system and associated calculations for the sizing of the disposal field are attached at Appendix 8. The calculations and assessment are based on a system that discharges into the ground within the disposal field rather than onto the ground.

The system provides for wastewater discharges of 10,820 L/day (peak) / 8,000 L/day (average) at a loading rate of 2mm per day over the disposal area identified on the plans. The area to discharge ratio is 7.56 m² /L/day.

Cleanwater diversions / bunds are proposed around the wastewater disposal area to direct overland flows around the disposal field.

4.5.3 Water Supply

It is intended to service the site via a connection to the public water supply system via the extension of a 100mm diameter watermain along Blake Road from Rowles Road. It is noted that this will require Watercare Approval, which will be sought at EPA stage.

Alternatively, should a public water connection not be permitted by Watercare, water supply will be provided to the school via on-site collection tanks. There is ample room within the site to accommodate water tanks if required.

4.5.4 Utilities

Power and telecommunication services are available in the Blake Road berm and will be extended to service the proposed buildings.



4.6 Rubbish Collection

Rubbish collection requirements for the proposed school are anticipated to be minimal. The school currently has a “No Waste” policy, which requires children to take home any waste they bring associated with their lunch. This policy will be retained when the school moves to the subject site.

Therefore, waste generated is expected to be limited to primarily paper waste and some administration / staffroom waste, along with some waste from the childcare facility. A rubbish area has been designated near the turnaround area for the staff and visitor parking by the childcare centre, where there is sufficient space for a small truck to manoeuvre to empty the bins.

4.7 Signage

It is proposed to erect two free-standing signs identifying the school; one at the Blake Road vehicle entrance to the site and one at the Foy Road pedestrian entrance. It is also proposed to erect signage on the wall of the administration block and on the wall of the childcare centre; both facing toward Blake Road and the carpark area. Refer to sheet RC05 of the Architectural Plans for details.

The free standing signs will have dimensions of 3m (h) x 1.1m (w) and will be located 0.5m from the boundary, within the site. The signs will not be illuminated or contain moving text. The content of the signs will contain the school logo, state “Entrance” and contain a building directory.

The signs on the wall of the administration building and on the wall of the childcare building will be approximately 0.5m (h) x 3.65m (w). This signs will identify the school logo and the purpose of the building and will not extend beyond the envelope of the building.

4.8 Landscaping

Landscaping is proposed throughout the development area, as shown indicatively on the Landscape Concept Plan attached at Appendix 4. Primarily the site will be in grass, with gardens of shrubs/grasses/flaxes around the buildings and parking areas and near the courts to soften the built form and paved areas and assist with stabilising batter slopes.

Hedging to 1.2m in height is proposed along the road frontages adjacent to the carpark areas to provide some screening of these areas from the road and maintain a more rural streetscape. Specimen trees will be planted throughout the site to enhance the amenity of the site, screen buildings, and contribute to maintaining a semi-rural feel to the site.

Hedging is proposed along the southern and western site boundaries to create a visual buffer between the school and adjacent horticultural activities and to manage potential reverse sensitivity effects along these boundaries, including spray drift from horticultural activities. Existing hedging along Blake Road will be retained along the southern part of that boundary to maintain existing amenity/rural character values along that boundary.



Fencing will be installed in locations identified on the Landscape Concept Plan, including along the street frontage of parking areas, around the stormwater management area for safety, and to delineate the school from the balance of the site to the south of the proposed activity. Fencing heights and typologies are still to be confirmed; however all fencing will be visually permeable and no more than 1.5m in height. Fencing along the road side of the carpark will be 1.2m in height and screened from the road by proposed hedging.

Flexibility is sought to enable the proposed landscaping to be implemented pragmatically, such that landscaping around the Stage 1(a) area only would be undertaken as part of the Stage 1(a) works, and likewise for Stages 1(b) and 2. In this regard, it is sought that hedging along the western site boundary is not required until such time that the existing hedge running north-south through the site is removed (with an exception for the stormwater management area) (ie the intention would be to retain the existing hedge for Stage 1 and to replace with the boundary hedge for stage 2). Similarly, hedging along the southern boundary would be provided up to the existing hedge noted above as part of Stage 1(a) and the balance provided as part of Stage 2. The flexibility is proposed to enable progressive implementation of landscaping comparative to the environmental effects of each stage to assist to manage the costs of implementing the consent. Final staging plans of proposed landscaping would be supplied for approval prior to undertaking the works and conditions are suggested in Section 8 of this report to manage the landscaping implementation and associated effects.

4.9 Lighting

Lighting will be established in all parking and pedestrian access areas to ensure full visibility throughout the year. The lighting design has not yet been completed; however compliance with the requirements of E24.6 will be achieved and would be accepted as a condition of consent accordingly.

4.10 Earthworks

Earthworks across the subject site are not proposed as part of this application as they are covered by a separate resource consent application lodged for the site (Council reference XXX). The earthworks sought separately will establish suitable grades for proposed buildings, playing areas, parking and access.

The proposed roading works, including the installation of a footpath along Blake Road will require earthworks to muck out the table drains as necessary, lay pipes and fill around the table drains, widen the road and level an existing bund within Blake Road to the north of the site to construct the footpath.

A total of 2,485 m³ of earthworks will be required over an area of 6,600 m². These works are detailed on drawings 220-231 in the Engineering Plans attached at Appendix 6. Sediment and erosion controls will be employed to divert clean water and contain sediment laden runoff within the works area, minimising sediment discharge as far as practicable and in accordance with TP90 and GD05 requirements.

Works will be undertaken progressively (to maintain operation of the roads during works) and stabilised upon completion with either road paving, footpath, or grass. No more than 2,500m² of works will be undertaken at a time.



Traffic management will be employed and required approvals obtained from Auckland Transport for works on the road.

4.11 Specialist Reports

4.11.1 Contamination

A Preliminary Site Investigation ('PSI') has been prepared by Natural Knowledge Ltd in April 2017 for the subject site and is attached as Appendix 11 to this application. This PSI confirmed that HAIL activities have occurred on the site. The PSI also carried out soil testing which found that soil contamination does not exceed the relevant standards under regulation 7 of the NES Soil.

4.11.2 Geotechnical

A Geotechnical Investigation Report (GIR) has been prepared for the site by Lander Geotechnics Ltd and is attached as Appendix 9 to this application. This report assesses the geotechnical stability of the site and provides recommendations for earthworks and building construction. Overall, the report confirms that the subject site is generally suitable for the proposed school development subject to monitoring of earthworks and adherence to the recommendations of the geotechnical completion report to be prepared at the completion of earthworks. The proposed development will adhere to each of the recommendations provided in this report accordingly.

4.11.3 Transport

A Traffic Assessment Report has been prepared by Commute Transportation Consultants for the proposed development and is attached as Appendix 10 to this application. This report has assessed the anticipated traffic effects associated with the proposed activity, including the proposed parking and access arrangements, effects of the proposal on Blake Road and adjacent intersections, including proposed upgrading works, and effects on the wider transport network associated with traffic generated by the activity.

The ITA concludes that the parking and access arrangement proposed is sufficient to manage the parking demand and associated effects of the proposal. The report also concludes that with proposed road upgrading works, the traffic effects of the proposed activity on the surrounding road network will be no more than minor.

4.11.4 Acoustic

An Acoustic Assessment has been prepared for the proposed development by Marshall Day and is attached as Appendix 12 to this application. This report confirms that the proposed activities will comply with the noise limits for the Countryside Living zone in relation to all site boundaries except the northwestern site boundary. Marshall Day has noted that compliance could be achieved by ensuring outdoor play areas are located at least 20m from the site boundaries. Whilst this is noted, to enable the size of the playing fields to be maximised on site, the applicant has obtained written approval from the neighbouring landowner for the proposal, as detailed in Sections 9 and 10 of this application.



5. Resource Consents

5.1 Weighting of Plans

The Auckland Unitary Plan was made operative in part on 15 November 2016. Therefore, the legacy district and regional plans shall only be considered where any relevant provision of the Unitary Plan remains subject to appeal.

The site's zoning, the provisions of the Rural – Countryside Living zone, the Pukekohe Hill Precinct, and the relevant transport and stormwater rules are all operative and therefore there are no matters to be considered under any of the legacy plans.

5.2 Matters Requiring Resource Consent

Based on the project description outlined in section 0, above, and the assessment against the relevant standards attached as Appendix 13 to this application, the proposal requires resource consent for the following:

5.2.1 Auckland Unitary Plan Operative in Part

1. Section 9(3) Matters – Land Use (District)

- **Discretionary Activity**, pursuant to H19.8.1(A48) for the establishment of an Education Facility (being the proposed primary school).
- **Discretionary Activity**, pursuant to H19.8.1(A12) for the disposal of non-residential waste that does not comply with standard H19.10.1(1) as the disposal field is not located at least 100m from the boundary of adjoining sites in the Rural – Countryside Living Zone.
- **Restricted Discretionary Activity**, pursuant to H19.8.1(A45) for a care centre for more than 10 people. The proposed childcare facility will cater for 60 children.
- **Restricted Discretionary Activity**, pursuant to E27.4.1(A3), for a proposed school that exceeds the threshold for primary educational facilities. The proposed primary school will cater for up to 450 students, exceeding the 167 child threshold.
- **Restricted Discretionary Activity**, pursuant to E23.4.2(A53) for comprehensive development signage. Two free standing signs and two signs on building facades are proposed to identify the school and childcare.
- **Restricted Discretionary Activity**, pursuant to E25.4.1(A2), for activities that do not comply with a permitted activity standard. The potential noise effects from the proposed school have been assessed as infringing the permitted noise standard at the boundary of the adjacent site to the northwest (adjacent to the playing fields).



2. Section 15 Matters – Discharges

- **Discretionary Activity**, pursuant to E4.4.1(A15), for the discharge of treated wastewater that is not otherwise provided for by any other rule in the Plan. The proposed rate of wastewater discharge is from a school which is excluded from the definition of “domestic type wastewater”.

5.2.2 Other Regional and District Plans

As outlined in section 5.1 above, all of the relevant parts of the Unitary Plan are operative and can be treated as operative in this case, and therefore no consideration of the legacy regional and district plans is considered necessary.

5.3 Permitted Activities

The following activities are considered to be permitted under all relevant planning documents:

- The proposed servicing and infrastructure (and related earthworks) are permitted activity under the Unitary Plan:
 - Pursuant to E26.2.3.1(A3) for service connections;
 - Pursuant to E26.2.3.1(A6) for removal of existing network utilities;
 - Pursuant to E26.2.3.1(A22) for underground electricity lines;
 - Pursuant to E26.2.3.1(A40) for underground telecommunication lines and facilities;
 - Pursuant to E26.2.3.1(A49) for underground pipelines and ancillary structures for the conveyance of water, wastewater and stormwater (including above ground ancillary structures associated with underground pipelines);
 - Pursuant to E26.2.3.1(A52) for water, wastewater and stormwater storage tanks;
 - Pursuant to E26.2.3.1(A57) for ventilation facilities, drop shafts and manholes related to water, wastewater and stormwater services; and
 - Pursuant to E26.2.5.3(A95) and (A96) for earthworks up to 2,500 m² and up to 2,500 m³ (at any one time) for network utilities.
- Temporary activities associated with building or construction (including structures and buildings that are accessory activities), for the duration of the project, or up to 24 months (whichever is the lesser) are permitted by E40.4.1(A20).
- The removal of non-indigenous vegetation is a permitted activity pursuant to E15.4.1(A44).



5.4 Summary of Consents Required

The above list comprises the activities and rules that are, or may be, infringed by the proposed development. However, the Council is not restricted in terms of its ability to assess all components of the application, and therefore, consent is also sought for any other non-compliance with Unitary Plan rules that the Council identifies.

Overall, the components of the whole proposal should be assessed together, as the RMA requires that the whole application be treated in accordance with the most restrictive activity status. Therefore, this application must be considered as a **Discretionary Activity**.

6. Statutory Context Under the RMA

6.1 Schedule 4 Matters

In addition to the matters outlined in section 1.1 of this report, clause 6 of Schedule 4 of the RMA specifies those matters that must be included within an AEE. These include the following relevant matters:

- Possible alternative locations/methods if it is likely that the activity will result in significant adverse effects on the environment, or if the application is for a discharge;
- An assessment of the actual or potential effect on the environment of the activity (including the sensitivity of the receiving environment to any discharge);
- A description of the mitigation measures to be undertaken to help prevent or reduce the actual or potential effects;
- A description of any monitoring; and,
- Identification of persons affected by the proposal and consultation undertaken.

These matters will be addressed in the in the forthcoming assessment of environmental effects.

6.2 Section 104A-D Considerations

In accordance with Section 104B of the RMA, as the application is for a Discretionary Activity, Council may grant or refuse consent and can impose conditions on the consent in accordance with Section 108. Council is not limited in its assessment of the application. Therefore, a full assessment of actual and potential environmental effects of the proposal has been undertaken.



7. Assessment of Environmental Effects

Assessment against those matters specified in Schedule 4 of the RMA is provided as follows and the relevant matters of section 104 of the RMA.

7.1 Permitted Baseline Assessment

Consideration has been given to what would be permitted in the Countryside living zone. Permitted activities include:

- Farming
- Rural airstrips
- Produce sales
- Home occupations
- Care centres for up to 10 people
- Informal recreation
- One dwelling per site.

With respect to the dwelling entitlement, it is noted that the site is currently held in two titles, thus two dwellings could be constructed. It is noted further that one of the titles is of sufficient size (over 6ha) to be subdivided to create three titles. Therefore, it is reasonably foreseeable that a total of four dwellings could be established on the subject site (following the required subdivision).

It is also reasonable to expect that the dwellings would have a rather large floor area (due to being located on a large site). A floor area of 450-500m² per dwelling could reasonably be expected. Therefore, four buildings of approximately 500m² each is a possible built form outcome for the site as a permitted activity (assuming compliance with development standards).

There is currently one dwelling on the site, which is proposed to be retained. The proposed school will comprise five buildings, each with a floor area of between 500-650m². The buildings have been positioned to comply with the relevant yard setbacks (being at least 12m from road boundaries, which is more than the minimum 10m required and over 120m from side boundaries) and maximum height requirements (being between 6-7.1m at the roof apexes, which is below the maximum height for both dwellings (9m) and other buildings (15m)). Therefore, the assessment of the building bulk effects should be limited to considering those effects of two additional buildings on the site, compared with what can reasonably be expected from residential development of the site and the buildings having a slightly larger footprint than what might be expected for a residential dwelling.

In addition, with respect to the built form and paved areas proposed, it is noted that a rural air strip is a permitted activity, which could include a sealed runway and associated hangar buildings. The level of development proposed (buildings and paved areas) is not considered to be too dissimilar to what could reasonably be anticipated for such an activity within the zone.

With respect to the proposed activity, it is also considered appropriate to consider the permitted activity standard for care centres, being those that provide for no more than 10 persons (ie a childcare centre for 10 children would be a permitted activity). It is noted that the number of persons the school and childcare combined are proposed to provide for well exceeds this threshold. Therefore, this aspect of the permitted baseline is not considered to be particularly helpful.



It is also noted that Informal Recreation is a permitted activity. Whilst this is a private development, it is anticipated that use of the school fields for informal recreation outside of school hours would be reasonably expected, thereby providing an informal recreation facility for the local community. It is also expected that the fields could potentially be used for organised sport after school and during weekends.

7.2 Actual and Potential Effects

The following sections provide an assessment of the proposed activity's actual and potential effects on the environment with respect to those matters listed in clause 7 of Schedule 4 to the RMA.

7.2.1 Neighbourhood and Community Effects

The relocation of KingsGate School to the subject site will enable the school to grow and provide an opportunity for a larger number of children to obtain a Christian based primary education. It is considered that this will have positive effects for the neighbourhood and community, through providing increased capacity for an established special character school to enable more parents to provide for the social and cultural wellbeing of their children in an environment aligned with their Christian values.

The proposed school and childcare facility will also provide future residents of the adjacent residential zoned land a primary/childcare education option in close proximity to their place of residence (noting other existing and proposed primary schools in the area are over 1.5km away).

It is noted that the proposed school may be perceived to have adverse effects on the farming community who currently use adjacent land for horticulture, and the wider community who purchase food grown on the site currently. Potential reverse sensitivity effects are addressed in Section 7.2.2 below.

With respect to potential effects of the use of the site for an educational facility compared with its current use and the benefits associated with the crops harvested from it, it is noted that the site is zoned for Countryside Living, which is not an inherently productive use of land. Therefore, it is considered inherent in the zoning of the land that the effects of a non-productive use of the site were deemed to be acceptable. As such, the use of the site for non-productive activities is considered to be a reasonably foreseeable outcome of the zoning of the site and any effects on the wider community are considered to be no more than minor. The proposal will enable the balance of the site to remain in horticultural use.

7.2.2 Reverse Sensitivity Effects

It is noted that the surrounding community contains a large farming / food production sector that places high value on the continued use of suitable land in Pukekohe for horticultural activities, and that this includes the use of neighbouring land for horticultural activities. The proposed development has been designed taking into account the rural surroundings of the site and existing horticultural activities, including associated heavy truck movements. The proposed roading upgrades have been designed to ensure that the intersections adjacent to the site can accommodate heavy vehicles alongside school associated vehicle movements.



The location of buildings and activity areas within the site have been located in general proximity to the residential boundaries of the site and to provide a buffer to adjacent horticultural land uses. In this respect the school buildings and fields are located over 100m from the neighbouring site to the south, at least 30m-50m from sites on the opposite side of Blake and Foy Road (noting these have a residential zoning), and the fields are approximately 10m from the neighbouring site to the northwest (albeit that neighbour has provided written approval to the proposal). Existing and proposed vegetation along site boundaries and road boundaries, combined with proposed buildings stepping down the hill below Blake Road will further buffer the proposed activity from the potential effects of neighbouring horticultural land uses.

Overall, it is considered that any effects of the proposed activity on the ability for the surrounding land to be utilised for horticultural activities will be no more than minor, and further, it is anticipated that any horticultural use of adjacent residential zoned land to the north and east of the site will be short term only.

Furthermore, it is noted that the site is not zoned Rural Production, or located adjacent to the Rural Production zone, but rather has a Countryside Living zoning and is adjacent to Residential zoned land. Whilst the surrounding properties are currently in horticultural use, this land use is anticipated to change over the next few years as residential development progresses to the boundary of the school, noting recent residential development one block away along Rowles Road and on Kitchener Road near the Rowles Road intersection.

7.2.3 Traffic Effects

The proposed school will result in additional traffic generation over and above that typically anticipated for Countryside Living development (ie 4 residential units on the site). The potential traffic effects of the proposal both on the immediate, and the wider surrounding environment have been assessed by Commute in the ITA attached at Appendix 10.

With respect to actual and potential effects on the local road network immediately surrounding the site, the ITA identifies that there is potential for conflicts to arise on Blake Road and Foy Road associated with vehicles entering and exiting the site, and negotiating the Foy Road intersection, noting that there are heavy vehicles that utilise this route. Therefore, road upgrading works are recommended, including creation of a right turn bay into the site and upgrading of the Foy Road intersection to enable heavy vehicles to turn into Foy Road whilst cars are waiting to turn onto Blake Road. Works associated with the upgrading would include some widening of Blake Road and associated tie in at Calcutta intersection and berm upgrades to Blake Road adjacent the site to include kerb and channel and pipe the table drain. In addition, to facilitate pedestrian accessibility to the subject site from the nearby established residential areas, the installation of a footpath within the western berm of Blake Road to the north of the site (joining the existing footpath on Rowles Road) is proposed. In combination, the ITA confirms that these upgrading works will ensure that the traffic effects of the proposed activity can be accommodated within the local road network with less than minor effects on the safe and efficient operation of the surrounding roads.



In addition to the above, with respect to managing effects associated with parent pick up and drop off activities, and avoiding or mitigating associated traffic safety effects, Commute has assessed parking demand for the activity to ensure sufficient provision for pick up and drop off activities on site (particularly noting that the adjacent roads are rural roads with no on-street parking). The ITA confirms that parking area 1 (along the Blake Road frontage) has sufficient capacity (40 carparks) to provide for pick up and drop off needs for up to 190 students, as well as staff parking requirements. At such time that the number of students exceeds 190, additional parking will be required (identified as carpark 2 on the application plans). Combined, the ITA concludes that the number of carparks provided in carparks 1 and 2 (80 carparks) will be sufficient to manage the parking demands of the activity for the total capacity sought for the school (450 students within the school plus 60 children within the childcare).

With respect to the wider potential traffic effects of the proposal, noting that due to the nature of the activity, being a character school, and to some extent the location of the school on the fringe of the urban area, Commute has considered the effects of associated traffic generation on the wider roading network. This assessment outlines the wide range of locations that current students access the school from. This catchment area has been extrapolated for the proposed student numbers, as it is expected that the proportion of students attending the school from the various surrounding locations identified would be similar. Overall, the ITA concludes that

“The relative increase in vehicle volumes on the wider network as a result of the schools relocation when taking into account the volumes these roads already carry versus their actual capacities is considered unlikely to prevent the safe and efficient operation of the wider roading network.”

The ITA comments further that:

“The traffic effects of the proposal on the wider network are expected to be minimal, as the larger than typical catchment means they will be dispersed across the network rather than concentrated in any one area,”

and that:

“overall, there are no traffic or transportation reasons to preclude the proposed development.”

The above assessment is based on anticipated traffic generation, assuming that the school has a travel management plan in place that encourages carpooling, walking school buses and other forms of transport to minimise traffic generation. Therefore, it is considered appropriate that a travel management plan would be a condition of consent.

7.2.4 Noise Effects

The potential acoustic effects of the proposed activity have been assessed by Marshall Day. Their report (attached at Appendix 12) concludes that with the exception of the proposed playing fields, all other buildings and activities on the site will comply with the relevant noise limits at the boundaries of adjoining sites.



With respect to the potential noise from children utilising the playing fields, the acoustic report identifies potential infringements in relation to the common boundary with the adjacent site to the northwest. Whilst compliance may not be achieved along this boundary, any effects are considered to be no more than minor, taking into account the horticultural use of the adjacent site, which is not a noise sensitive land use. Furthermore, affected party approval has been obtained from the owner of this site (refer Appendix 14), and therefore, any effects of the proposal on this site can be disregarded.

Noise effects beyond the identified site and in relation to the wider surrounding environment will be within permitted standards and are therefore considered to be less than minor.

7.2.5 Physical Effects

The physical effects associated with the proposed development relate to the establishment of buildings, pavements and parking and access areas within the site and upgrading works to Blake Road and associated intersections.

The physical effects associated with the proposed buildings are considered to be similar to physical effects that could reasonably be anticipated in the Countryside Living zone in terms of size and scale, for example barns/sheds, large residential dwellings etc. A parking and access arrangement similar to that proposed could also reasonably be anticipated for permitted activities such as a rural airstrip, produce sales etc.

The characteristics of the site (sloping topography) and position adjacent to residential zoned land is considered to provide an appropriate context and location for the school, and the site layout and design of buildings and paved areas, combined with proposed landscaping is considered to achieve a built outcome for the site that is appropriate for a rural site.

Physical works within the adjacent roads will cause some disruption to traffic during works, however, the proposed works can be managed in a way that minimises the impact on the operation of the roads during works. This can be refined through construction and traffic management plans for the construction phase to ensure that Blake Road and Foy Road remain open to traffic as much as possible (ie through working one side of the road at a time etc.). It is considered that the physical quality of the road environment following works will be improved from the current road environment. All physical works in the road reserve have been designed to ensure works do not extend into adjacent private properties (with the exception of the subject site).

7.2.6 Effects on Ecosystems, Natural Resources and Physical Resources

The site does not contain, and is not adjacent to any river, stream or other ecological features, no scheduled trees will be removed as part of this application, and there are no known heritage features at the site that would be adversely affected. It is noted that there is a farm drain along the western boundary of the site within the neighbouring property. However, this is a farm drain only for the management of overland flows from the adjacent horticultural activities.



It is noted that the proposal comprises the use of land currently in market gardens for the establishment of a school. Whilst a school is not a “productive” use of the soil resource within the site, it is an efficient use of the land resource to provide for social infrastructure where there is no capacity to accommodate the activity within the current urban setting of the school’s existing site, or arguably in central Pukekohe at all, given existing residential development.

The site is zoned for lifestyle living activities, rather than rural production, which indicates that harvesting the productive use of the soil is not the primary land use function anticipated for the site (and neighbouring sites), and lies within a strip of Countryside Living zoned land that appears to have been zoned as such to create a buffer between the adjacent residential and rural production zoned land.

The layout and orientation of the school has been designed to contain the built form within that part of the site that borders the Single-House zone, leaving those parts of the site adjacent to Countryside Living zoned land either in fields/grass, or maintained for horticultural use. It is noted that Rural Production zoned land lies further to the south of the site beyond the extent of the Countryside Living zone. Therefore, the proposal will maintain a reasonable separation distance between the proposed activity and the land zoned (and anticipated to be used) for Rural Production, including horticultural activities and productive use of the soil resources in that zone. Therefore, the effects of the proposed development on natural and physical resources are considered to be no more than minor, and are not inconsistent with effects anticipated in a Countryside Living zone.

The use of Countryside Living zoned land for a school that draws from a wide catchment (including neighbouring rural towns and villages) will also maximise the ability for residential zoned land in Pukekohe to be utilised for the provision of housing, and for state schools that have a limited student catchment area. This is considered to contribute to the efficient use and development of zoned residential land.

It has been established that theoretically the subject site could accommodate 4 lifestyle properties (assuming subdivision to minimum lot size enabled for zone, being 2ha). Therefore, the establishment of a school at the subject site results in the loss of land currently in horticultural use, but with a planned potential to accommodate four residential dwellings. Conversely, location of the school in a neighbouring Residential zone would result in the loss of approximately 30-40 dwellings (assuming 5.4ha site in Pukekohe Hill Sub-precinct A allowing for roads and reserve areas), and potentially 75-100 dwellings in a Mixed Housing zone. Noting the demand for affordable housing, it is considered that this is a positive outcome of the proposed school location.

7.2.7 Effects of any Discharge of Contaminants

The proposal includes stormwater management by way of retention and detention on-site, and also includes treatment of runoff from carpark and access areas, which have the potential to contain high contaminant levels. These measures combined will ensure that the effects of any stormwater discharge from the site will be negligible on downstream ecosystems. The Stormwater Report attached at Appendix 7 fully outlines compliance with the relevant stormwater provisions of the Unitary Plan.



The proposal includes the collection, treatment and onsite disposal of wastewater, as reasonably anticipated in a rural zone. The disposal area has been sized to accommodate anticipated waste generated by the proposed development, as set out in the wastewater memo attached at Appendix 8. This includes a primary disposal area and a secondary disposal area to ensure that appropriate loading rates are maintained to mitigate any adverse contamination effects beyond the site, or on ground water.

The proposed loading rates are low (2mm/day) due to the soil type (standards allow for up to 5mm/day depending on soil type). Groundwater levels are also low (noting no ground water was encountered during the geotechnical investigation (refer Appendix 9) which tested to depths of 3-5m below surface. As such, contamination of groundwater from the proposed wastewater disposal is not anticipated.

It is noted that the wastewater disposal area is located in close proximity to the site boundary (3m away). However, the system will comply with all relevant standards (including TP58) and water being discharged to land will be treated to required standards prior to discharge and will be discharged into land, not over land. Furthermore, as the site slopes away from the adjacent site to the south, treated wastewater discharged onto the site will drain through the soils away from that adjacent site.

With respect to the adjacent site to the west, there is an existing overland flowpath within the adjacent site along that boundary and hedging is proposed to be planted along the boundary. Therefore, a physical separation will be maintained between the discharge area and that adjacent site. Proposed bunding along the edges of the disposal area will further contain discharges within the subject site and divert clean water away. For these reasons, any effects beyond site boundaries, including on the receiving environment, are considered to be less than minor.

7.2.8 Risks of Hazards

It is noted that there is a flood plain annotation over the subject site. However, based on site survey, it does not appear that there is a flood plain within the site. Furthermore, following earthworks, there will be no floodplain within the site. Any displaced ponding of stormwater can be accommodated by the stormwater basin, which has been sized to allow for all overland flow up to the 1% AEP and includes extended detention, as outlined in the Stormwater Report attached at Appendix 7. Therefore, there would not be any downstream flooding effects resulting from the proposed development.

The geotech report prepared for the site (attached at Appendix 9) identifies that the site is suitable for the establishment of a school. Earthworks to establish the finished grades for the school have been sought separately and all buildings would be constructed in accordance with the foundation recommendations of the geotechnical completion report when complete. This will be confirmed at Building Consent stage.



The site has been subject to a HAIL activity, being horticultural use. This is confirmed in the attached PSI. This report notes that based on preliminary testing, contaminant levels at the site are below required levels for residential activities. Therefore, based on the findings of that report, any health risk associated with contaminated soils is considered to be low. It is noted, that as part of the earthworks resource consent application, Council has requested further contamination information by way of a Detailed Site Investigation. This report is currently being prepared and will be provided upon completion. Conditions of consent would be appropriate requiring that any remediation of soils identified as being required by that report is completed prior to establishment of the proposed activity. This would ensure that any potential health risk is mitigated.

7.3 Provisions of the Auckland Unitary Plan Operative in Part

For the purpose of this assessment, the Auckland Unitary Plan Operative in Part is the only plan or proposed plan applicable to the site considered to contain any “relevant provisions” (refer 5.1 above). The following sections provide assessment against these relevant provisions, as required by clause 2(1)(g) of Schedule 4 to the RMA.

7.3.1 Water Quality and Integrated Management (SW/WW)

The relevant objectives and policies related to water quality and integrated management are contained in sections E1.2 and E1.3 (respectively) and include:

- Objectives E1.2(3); and
- Policies E1.3(15), E1.3 (23) and E1.3(24)

The proposed development is considered to be consistent with the environmental outcomes sought by the above objective and policies for the following reasons.

The proposed stormwater management approach for the site includes ground soakage, in compliance with the Pukekohe Hill Precinct Provisions. Treatment of runoff from parking and access areas will ensure contaminant removal prior to soakage to avoid or minimise any adverse effects of stormwater contamination on groundwater in accordance with best practice. Soakage will be provided within the stormwater basin at the low point on the site, away from any existing or proposed buildings to avoid land stability effects, and allowance has been included in the stormwater basin for the 1% AEP flood event. Therefore, no adverse flooding effects are anticipated.

On-site wastewater disposal is proposed, consistent with standard practice in the Countryside Living zone, noting that there is not a public wastewater connection to the site. In the future when wastewater services are extended to service adjacent residential development, it may be possible to connect the site to the public system. However, in the interim, the proposed on-site system is considered to be the most efficient and cost effective approach to manage wastewater.



Wastewater will be treated onsite and discharged to land, in accordance with required standards to ensure that discharged wastewater will not result in ground contamination above accepted levels. This will also be ensured through maintaining a suitable sized disposal field with primary and secondary disposal areas to enable the discharge to be managed at appropriate loading rates, as confirmed in the Wastewater Memo (Appendix 8). Overall, the proposed on-site wastewater system will accord with best practice and any effects on groundwater, surface water, public health and amenity will be minimal.

The proposed system is considered to be appropriate for the site conditions. The disposal area has been designed in consultation with Lander Geotechnics to accommodate the soil typologies and associated loading rates.

Taking the above assessment into account, it is not anticipated that the proposed on-site wastewater disposal will result in adverse effects on Mana Whenua values. Consultation with iwi will be progressed to ensure that all potential effects on Mana Whenua values have been considered and any feedback received will be forwarded to Council upon receipt.

An operation and maintenance plan for the system will be confirmed at Building Consent stage and it is anticipated that ongoing maintenance of the system will be the responsibility of the landowner.

7.3.2 Noise

1. Objectives and Policies

The relevant objectives and policies related to noise are contained in sections E25.2 and E25.3 (respectively) and include:

- Objectives E25.2(1) to E25.2(3); and
- Policies E25.3(2), E25.3 (3), E25.3(7) and E25.3(9)

The proposal is considered to be generally consistent with the above objectives and policies, as it provides for an activity that has potential to generate reasonable levels of noise in an environment that is less sensitive to noise effects (being a rural environment). However, the proposal also ensures that compliance with the relevant noise controls will be achieved in relation to the adjacent residential zoned land, mitigating potential future effects on future dwellings. Overall, the proposal meets all relevant noise controls for the zone, with the exception of some potential effects on the adjacent site to the west. In this regard, it is noted that affected party approval has been obtained from that landowner, and that the adjacent horticultural activity is not a noise-sensitive activity.

With respect to potential reverse sensitivity effects on the school, the proposed school and childcare buildings (being the learning spaces) have been positioned near the residential boundaries of the site and away from the rural site boundaries to minimise potential effects.

2. Assessment Criteria

As the infringement to the noise standard is a Restricted Discretionary Activity, consideration has also been given to the relevant matters of discretion to inform the assessment of effects. The relevant matter of discretion is set out at E25.8.1(1) being:



- (1) *for noise and vibration: (a) the effects on adjacent land uses particularly activities sensitive to noise;*

With respect to the above, as noted the adjacent land in relation to which the potential infringement occurs does not contain any activities sensitive to noise, and therefore, any effects are considered to be no more than minor. Furthermore, affected party approval has been obtained.

7.3.3 Natural Hazards and Flooding

The relevant objectives and policies related to natural hazards and flooding are contained in sections E36.2 and E36.3 (respectively) and include:

- Objectives E36.2(1) to E36.2(5); and
- Policies E36.3(4), E36.3 (16), E36.3(21), E36.3(26), and E36.3 (29) to E36.3 (30)

As assessed in Section 7.8.2 above, the proposed school has been designed to ensure that any risks to people, property, infrastructure and the environment from natural hazards are avoided or mitigated. This includes the location of buildings outside of flood plains and sizing of the stormwater basin to account for climate change and avoid downstream flooding effects. The geotechnical report for the site confirms that the site is suitable for the proposed development and all buildings will be designed in accordance with the recommendations of the geotechnical completion report following earthworks to ensure any stability risks are avoided.

7.3.4 Transport

1. Objectives and Policies

The relevant objectives and policies related to transport are contained in sections E27.2 and E27.3 (respectively) and include:

- Objectives E27.2(1) to E27.2(5); and
- Policies E27.3(1) to (3), E27.3(8), E27.3(14), E27.3(17), E27.3(18) and E27.3(20)

The proposed development is considered to be generally consistent with the above objectives and policies for the following reasons.

The proposed development will have a trip generation rate that triggers the need for a transport assessment. Commute Transportation Specialists has prepared an Integrated Transport Assessment for the proposed development. This assessment includes a thorough assessment of anticipated traffic generation and associated effects, including proposed measures to mitigate those effects, which include improvements to the local roading network (particularly Blake Road and the Foy Road intersection) and requiring a travel management plan for the school, which encourages carpooling, walking school buses etc. The proposal also includes a footpath extension to the site (from the currently developed residential area) to provide for walking and cycling in the interim until the adjacent residential zoned land is developed. Overall, the ITA concludes that the traffic effects on the surrounding road network will be no more than minor.



The proposal includes the provision of 80 carparks, suitable loading area for the activity, and 29 cycle parks, which is assessed in the ITA as being sufficient to provide for the anticipated needs of the activity and meets or exceeds Unitary Plan requirements. It is noted that a higher carpark provision is proposed for the activity than that required by the Unitary Plan standards, due to anticipated pick-up, drop-off peak demand, with the school drawing pupils from a wide catchment with a higher proportion of parent drop-off anticipated.

The bicycle parking and proposed footpath extension along Blake Road will encourage walking and cycling for those students and staff living within walking or cycling distance of the school. The footpath will also enable walking school buses to be encouraged by the school.

Loading space for rubbish collection has been allowed for adjacent to the childcare centre, with sufficient manoeuvring space allowed for. Overall the loading needs of the school are anticipated to be minimal, and deliveries will primarily occur outside peak drop off and pick up times, thus the pick up/drop off area will have sufficient space for any other loading requirements.

The parking areas have been located near the frontage of the site from a practical perspective, and taking into account the sloping topography of the site and required maximum grades for access and parking areas. As outlined in the ITA, all parking and access areas are compliant. Landscaping is proposed between the adjacent roads and the parking areas to screen parking areas from the road and enhance the streetscape.

The parking and loading areas ensure sufficient space for manoeuvring so that reversing of vehicles onto Blake Road does not occur.

The vehicle crossings and associated access to the site have been designed to enable a one-way movement of vehicles through the primary drop-off area. The southern vehicle crossing is entry only, whilst the northern vehicle crossing is exit only. The vehicle crossings have also been positioned at least 10m from existing intersections. As assessed in the ITA, the location of the proposed vehicle crossings and one-way traffic movements will ensure safe and efficient access and egress of vehicles to and from the site.

The size and configuration of the vehicle crossings has been designed to enable bus access and a taper entrance has been provided noting the existing speed environment. The right turn bay proposed will provide for turning traffic to safely await a gap in the traffic and has been sized to meet anticipated traffic demand. The location of the southern crossing ensures that the right turn bay does not extend across the existing intersections. Overall, the ITA concludes that the proposed access arrangement will provide for safe, effective and efficient movement to and from the site and minimise potential conflicts between vehicles, pedestrians and cyclists.

2. Matters for Discretion

It is noted that the traffic generation of the proposed activity is a Restricted Discretionary Activity, and as such, reference has also been made to the relevant matters of discretion. These matters are set out in E27.8.1(4) and address:

- (a) *effects on the transport network.*



The associated assessment criteria require consideration of the effects on the function and the safe and efficient operation of the transport network, including pedestrian movement, and the implementation of mitigation measures proposed to address effects.

The above matters have been thoroughly assessed in the ITA prepared for the proposal, and in Sections 7.2.3 of this application and the assessment in relation to the relevant objectives and policies above. Overall, the effects of the proposal on the surrounding road network are considered to be no more than minor and suitably mitigated by the road upgrading works proposed, the extent of parking provided within the site, and the establishment of a travel management plan as a condition of consent.

7.3.5 Signs

The relevant objectives and policies related to signs are contained in sections E23.2 and E23.3 (respectively) and include:

- Objectives E23.2(1) to E23.2(2); and
- Policies E23.3(1) to (5)

The proposed development is considered to be generally consistent with the above objectives and policies for the following reasons.

The proposed signage will provide for identification of the school to visitors and wayfinding within the school grounds.

The proposed signs within the front yards of the site have been located at the entrances to the site and have been sized so that they can be easily read by passing motorists without causing a traffic hazard.

Overall, taking into account the context and size of the site and the design of the proposed development, including proposed landscaping, any visual amenity effects of the proposed signs on the surrounding environment are considered to be no more than minor on the surrounding environment.

The permitted building height for the zone is 9m, which the signs will not exceed (being 3m in height). However, it is noted that the signs will be located in the front yards, constituting a yard infringement. However, the position of the signs within the front yard is considered to be appropriate to enable them to be visible to passing motorists and pedestrians and are not considered to result in significant visual or amenity effects on the streetscape, particularly noting landscaping proposed near the signs.

The proposed signs on the administration and childcare buildings is not considered to significantly detract from the profile or appearance of these buildings. The signage will be limited to identification of the school and building and will not extend beyond the building façade or obscure any significant architectural features on the building facades.

One sign is proposed on each frontage, and there are no other signs located along the frontage of the subject site, or on adjacent sites. Therefore, the proposed signs are not considered to create clutter or dominate the environment.



The proposed signs will not be illuminated or have flashing or changing messages. The size and content of the signs has been proposed to ensure that the signs are easily readable to motorists passing the school and pedestrians approaching the school without causing safety hazards.

There are no historic heritage places in the vicinity of the site. It is considered that any effects on visual amenity values will be no more than minor, taking into account the location and setting of the site.

1. Comprehensive Development Signage

The proposed activity includes wall mounted signage and free-standing signage. The relevant matters for discretion are contained in section E23.8.1 and the relevant assessment criteria are contained in section E23.8.2. These have been considered as follows:

- (1) *visual amenity;*
- (2) *scale and location;*

Considering the criteria contained in section E23.8.2 related to visual amenity, scale and location, the following comments are made:

- The proposed signs are considered to be appropriate in terms of scale, form and type to provide suitable identification of the school and the buildings within the site for ease of use.
- Due to the sloping topography of the site, not all proposed signs will be visible from any one vantage point, and signage along Foy Road is not anticipated to be highly visible from Blake Road (and vice versa). This will be further assisted by proposed landscaping. Signage on the childcare centre will primarily be visible from within the site carpark rather than from the road.
- The proposed signs on the building facades will be an integrated element of the building and will not extent beyond the building facades.
- The signs will have a simple structure and content, and the colour of the sign content will not be visually obtrusive. The school colours (being blue and navy) are proposed to be utilised as the primary colours for the signage.
- It is not considered that the proposed signage would dominate the outlook from any dwelling. There are currently no dwellings located in a position that they would have views of the proposed signage. At such time that residential development of the adjacent land occurs, the proposed signs would be an established part of the environment.
- Taking into account the expanse of the school site (boundaries being some 300m in length), the location of one sign within the yard of each boundary is not considered to result in dominant views from the adjacent streetscape. Proposed landscaping will further soften the built form of the site (including proposed signage) and minimise adverse visual amenity effects.

Taking the above matters into account, the visual and amenity effects of the proposed signage are considered to be no more than minor.



(3) *lighting and traffic safety;*

All lighting will comply with the Unitary Plan standards contained in chapter E24. The proposed signage will not display variable images or be illuminated or flashing. The size of the content on the signs will ensure ease of visibility to passing motorists to minimise effects on traffic safety.

(4) *duration of consent; and*

It is not considered necessary to limit the duration of the consent for the proposed signage.

(5) *cumulative effects.*

There are no other signs near the site that would result in the proposed signs generating any cumulative effects. It is considered appropriate for two signs to be located at the street frontage of the activity as the activity has two road frontages and there is access from each frontage for either vehicles or pedestrians.

7.3.6 Rural Zones – General

The relevant objectives and policies related to rural zones - general are contained in sections H19.2.1 and H19.2.2 (respectively) and include:

- Objectives H19.2.1(1) to H19.2.1(4), H19.2.3, H19.2.5(2) to (4); and
- Policies H19.2.2(1), H19.2.2(3) to (6), H19.2.4, H19.2.6(2)

The proposed development is considered to be generally consistent with the above objectives and policies for the following reasons.

Objective 1 recognises that rural areas are “*where people work, live and recreate and where a range of activities and services are enabled to support these functions*”. A school is a supportive function for people living in a rural environment.

It is relevant to consider the general rural objectives and policies holistically, taking into account the overall approach that the Plan takes to providing for productive rural land uses, but also managing the location of other activities within rural zones and encouraging rural lifestyle landuses within the Countryside Living zone (ie outside of the Rural Production and Mixed Rural zones in particular).

Bearing this in mind, the policy framework is strong on ensuring that elite and prime soils are protected for rural production activities, whilst countryside living and other activities are directed to land specifically zoned for Countryside Living, or land that does not have elite/prime soils.

With respect to this application, the site is located in the Countryside Living zone, not the Rural Production zone or the Mixed Rural zone. Therefore, the land in this zone has been identified as suitable for non-productive land uses that typically suit larger rural-residential type sites, and provide a buffer to residential land uses. Therefore, it is considered appropriate that this site is used for a “non-productive” land use, provided that it doesn’t compromise the ability of adjacent Rural Production zoned land to be used for productive rural activities. In the case of this site, the productive use of the surrounding land is presently horticultural, albeit that a rural residential environment will ensue.



The proposed activity is not considered to undermine the productive potential of nearby Rural Production zoned land. The activity has been designed and located to be adjacent to the rural urban boundary and maintains a buffer to the adjacent site to the south which is currently in horticultural use (albeit the zoning of that site is also Countryside Living zone). The buildings and main activity areas, and more noise-sensitive learning spaces have been located in the eastern part of the site (adjacent the Single House zone) with the western part of the site being in fields (adjacent to the neighbouring horticultural land use. In addition, boundary treatments (existing and proposed hedging and planting) will maintain a visual and physical separation between the land uses. Therefore, it is considered that potential reverse sensitivity effects will be suitably mitigated and managed to enable the continued productive use of adjacent land.

With respect to objective and policies addressing rural character, amenity and biodiversity values (objective H19.2.3 and Policy H19.2.4), it is considered that the proposed school will respect rural character and amenity values.

A school in itself is not a rural activity or an urban activity, it is its own class of activity. Care has been taken in the design of the school to minimise potential urban characteristics of a school activity and instead create a site layout and buildings that respect the rural zoning and setting of the site (refer to the Design Statement attached at Appendix 5). Features of the school that assist to maintain rural character include:

- Separation of the school into five buildings which reduces building bulk to achieve buildings more similar in scale to those reasonably anticipated in a rural zone
- Use of single-storey buildings with simple low-lying forms (approximately 6m high) to reduce visual impact
- Selection of materials and finishes to fit within the rural context and minimise light reflectance
- Long building elevations are angled to reduce visual impact on the public realm
- alignment of buildings with contours to minimise earthworks and enable the buildings to sit well within the landscape of the site, stepping down the contour.
- Setting buildings back from site boundaries
- Planting and screening paved areas and carparks
- Use of batters rather than retaining walls

With respect to Objective H19.2.5(3), the proposed school will provide for the social and cultural well-being of people and local communities, in a manner that complements the rural character and amenity of the surrounding area. Also, it is relevant to take into account that the site is located on the Rural Urban Boundary and that the character and amenity of the adjacent land to the north and east is anticipated to change to an urban character and amenity over the next few years accordingly.



7.3.7 Countryside Living zone

1. Purpose of the Zone

The zone description for the Countryside Living zone states:

“Some parts of the zone reflect historical subdivision patterns, while other areas were established on rural land that did not have significant rural production values, and was often associated with steep topography and poor soils.”

As discussed further in Section 7.4.2 below with respect to the relevant RPS objectives and policies, the policy framework of the RPS directs productive soils to be maintained for productive land use and lifestyle living activities to be contained primarily within Countryside Living zones (or on non-productive soils). Given that the site has been specifically zoned Countryside Living (rather than rural production), and noting the above explanation for the Countryside Living zone, this reflects an intent when the subject site was zoned, that this land would not be utilised primarily for productive land uses, but rather that it would provide for rural-residential lifestyle living and associated activities.

Schools are not provided for as permitted activities in any zones – they are discretionary in all zones. Therefore, the suitability of a location for a school is determined by other factors such as demand (catchment of potential students), availability of land at a suitable price, accessibility etc.

The subject site has been chosen by the applicant as it is of sufficient size to accommodate a school of the size required, based on anticipated growth projections, in close proximity to Pukekohe and relatively central to surrounding rural towns that it draws students from (Waiuku, Buckland, Tuakau, Drury etc).

Whilst it is noted that the activity is identified in the Plan as a Discretionary Activity, it is considered that it is still contemplated. It has not been identified as a non-complying or prohibited activity. There is nothing in the standards that differentiates educational facilities that are related to the rural environment vs other educational facilities.

2. Objectives and Policies

The relevant objectives and policies related to the Countryside Living zone are contained in sections H19.7.2 and H19.7.3 (respectively) and include:

- Objectives H19.7.2(1) to H19.7.2(5); and
- Policies H19.7.3(1), H19.7.3(5)

The proposed development is considered to be generally consistent with the above objectives and policies for the following reasons.

- The activity of a school is a social activity that supports rural lifestyle living and provides an education facility for people living within the surrounding rural area, as well as within Pukekohe and neighbouring towns and villages.



- The proposed school has been designed taking into account the rural context of the site and the buildings and site layout have been designed to be in keeping with the rural character and amenity values of the area, also noting that the adjacent land is zoned for residential development and is anticipated to change to an urban character over the next few years. It is considered that the activity achieves a rural character more consistent with rural lifestyle living than with rural production, consistent with policy H19.7.3(5).
- The proposed buildings are of a scale and intensity not out of character with other activities that could feasibly establish at the site, and existing and proposed landscaping and open grassed field areas will maintain and enhance amenity values.
- The development can be suitably serviced for wastewater and water supply, and is in accordance with the relevant Precinct provisions for stormwater, in a manner consistent with that anticipated for rural land, being onsite wastewater and water supply (if public water supply cannot be provided).
- The layout of the site and position of buildings has been designed to ensure that the proposed activity will not compromise the ability of all adjacent zones to be effectively and efficiently used for appropriate activities.
- The neighbouring sites to the north and east are zoned for residential development, which is a compatible use with school activities, noting that some of the residents may attend the school.
- The adjacent sites to the south and west are zoned Countryside Living, and therefore, it is reasonably anticipated that their end use is rural lifestyle activities. It is acknowledged that these sites are currently in horticultural use. In this regard, the school development has been located in the north-eastern part of the site, maintaining a separation of at least 80m to the adjacent site to the south. The neighbouring landowner to the west has provided written approval to the application. Regardless, the buildings and more sensitive learning spaces are located some 140m from the western site boundary. Existing and proposed vegetation along site boundaries will provide a further buffer between activities and minimise any potential reverse sensitivity effects in relation to horticultural use of the neighbouring land.
- The proposed school is not anticipated to compromise the safe and efficient operation of existing rural production activities in the adjacent rural production zone, noting that the activity is located at least 120m from the closest Rural Production zone boundary and generally a greater distance than that. Combined with existing and proposed vegetation, this is considered to provide a suitable buffer and mitigate any potential reverse sensitivity effects associated with ongoing horticultural (or other productive use) of the nearby Rural Production zone.
- It is noted further that there are other rural schools in the surrounding area (eg. Mauku School, Puni School, Karaka School), some of which are located adjacent to horticultural land uses. Therefore, the juxtaposition of these activities is not uncommon and can be suitably managed.



- The proposed land use is considered to be appropriate for the size of the subject site. As shown on the site plan there is sufficient room for teaching space, along with outdoor play space, stormwater and on-site wastewater management, and required parking and access areas, whilst still maintaining open grassed/garden areas.
- Stormwater runoff from the activity will be managed via treatment of potentially contaminated runoff and onsite retention and detention in a manner compliant with the relevant Precinct and Unitary Plan standards for stormwater. This will ensure that downstream stormwater effects are mitigated to pre-development levels.
- Roading upgrades proposed to Blake Road and the intersection with Foy Road will ensure that traffic effects of the proposal on the local roading environment are suitably mitigated to maintain operation of these roads for rural traffic (including heavy vehicles) and urban traffic heading to and from Pukekohe, whilst facilitating safe entry and exit to the site and operation of the Foy Road intersection for school related traffic.
- Earthworks approvals to facilitate the proposed school have been sought separately, however, it is noted that the anticipated contours for the school are generally in keeping with the existing topography of the site, with building platforms stepping down the site contours.
- There are no wetlands, riparian margins, historic heritage sites or scheduled sites or places of value to Mana Whenua located within the site. Therefore, the proposal is not considered to adversely affect any of these matters, nor are there any opportunities to enhance such areas.
- Landscape planting is proposed in a manner that reflects typical rural vegetation patterns as far as practicable. The only vegetation within the site currently (apart from crops) are hedgerows to delineate crop areas. The proposed landscaping includes the use of hedges, particularly along the street frontages of the site. The balance of landscaping comprises planted areas (shrubs, flaxes and grasses) on batter slopes (as would be typically found in rural areas) and scattered specimen trees, whilst also maintaining large grass areas.

3. Matters of Discretion

It is noted that the proposed childcare centre is a Restricted Discretionary Activity, and as such, reference has also been made to the relevant matters of discretion. These matters are set out in H19.12.1(1) and address:

- (a) *effects on rural character and amenity values of the neighbourhood;*
- (b) *effects of noise on the amenity values of the neighbourhood;*
- (c) *effects of traffic volume on the safety of and convenience of other road users;*
- (d) *effects of stormwater management;*
- (e) *effects on land containing elite soil or prime soil for rural production activities; and*
- (f) *effects on areas identified in the Outstanding Natural Landscapes, Outstanding Natural Character and High Natural Character Areas overlays.*



The above matters have all been considered either in the assessment against the objectives and policies for the zone above, in relation to the objectives and policies regarding noise, stormwater management and traffic or in the general assessment of environmental effects. Overall, the effects of the proposal with respect to the above matters are considered to be no more than minor and will be managed / mitigated by the design of the proposal. The site is not identified as an Outstanding Natural Landscape, Outstanding Natural Character Area or High Natural Character Area.

7.3.8 Pukekohe Hill Precinct

The relevant objectives and policies related to the Pukekohe Hill Precinct are contained in sections I433.2 and I433.3 (respectively) and include:

- Objectives I433.2(1) to I433.2(3); and
- Policies I433.3(1), I433.3(5), I433.3(8), I433.3(9) and I433.3(10)

The proposed development is considered to be generally consistent with the above objectives and policies for the following reasons.

- The proposed development is not considered to adversely affect the heritage and amenity values of the summit of Pukekohe Hill or the upper slopes, as the site is located on the lower slopes of Pukekohe Hill and the height of buildings is below the height limits for the zone.
- Stormwater runoff from within the site, and management of upstream stormwater flows through the site will be managed through the stormwater management approach for the site, which includes provision for onsite retention and detention of stormwater, and minimising stormwater flows discharging from the site.
- The proposed activity will result in land currently in horticultural use (with bare soils that are easily eroded) being stabilised with buildings, grass and vegetation, thereby reducing soil erosion and downstream siltation effects.
- The proposal includes upgrades to the adjacent road network to manage traffic associated with the activity and existing traffic on the road network, and in particular, enhancing the safety and function of the Foy Road / Blake Road intersection.
- The school has been designed to respect the topography of the site as far as practicable. Whilst earthworks for the activity do not form part of this application, the layout of the site has been designed to orientate buildings along the site contours to minimise the extent of earthworks required and to ensure that the buildings sit within the landscape, effectively terracing down the site.
- The proposed development is considered to support the safe and efficient movement of pedestrians, cyclists and vehicles through proposed road upgrades, including the provision of a footpath along Blake Road.



7.4 Provisions of Other Planning Documents

The following sections provide assessment against relevant provisions of other planning documents, as required by clause 2(1)(g) of Schedule 4 to the RMA.

7.4.1 Other District and Regional Plans

As outlined in section 5.1 above, none of the legacy Auckland Council district and regional plans (including the Auckland Council District Plan (Franklin Section)) are relevant to the proposed development as each of the equivalent rules of the Unitary Plan are either operative or can be treated as operative in relation to this proposal.

7.4.2 Regional Policy Statement

The Auckland Regional Policy Statement (RPS) is comprised in Chapter B of the Auckland Unitary Plan. There are no parts of the RPS relevant to the proposed activity subject to appeal, and therefore, the RPS is considered to be effectively operative for the purposes of assessing this application.

The relevant issues in the RPS for the proposed activity are considered to be those relating to:

- Infrastructure, transport and energy (B3); and
- The use and development of rural land (Section B9)

With respect to the objectives and policies in B3, objective B3.3.1 and Policies B3.3.2(5) are considered most relevant with respect to transport. It is noted that this policy seeks to locate high trip-generating activities so that they can be efficiently served by public transport services, whilst policy (5)(d) states that proposals for high trip-generating activities that are not located in centres, on corridors or at public transport nodes should be required to avoid, remedy or mitigate adverse effects.

These policy outcomes have been taken into consideration, along with the character and nature of the activity and the wide catchment it draws from. As assessed in the ITA, regardless of where the school is located, due to its character, it is likely to draw most students from locations where they would access the site via private vehicle. The implementation of a travel management plan is proposed to mitigate potential effects; however, overall the effects of the proposal on the transport network have been assessed as no more than minor.

It is considered to be particularly relevant, that this is a character school drawing from a wide catchment, rather than a state school that would have a smaller school zone and draw students from the immediately surrounding area (thus be more appropriately located in a more central/accessible location). The location of the site is near one of the key roads into Pukekohe (Waiuku Road) and it is expected that a proportion of trips will only require a slight detour to existing network trips associated with parents commuting to work.

With respect to the objectives and policies in B9, key issues include:

- Protecting the finite resource of elite quality soils from urban expansion;



- Addressing reverse sensitivity effects which rural-residential development can have on rural production activities;
- Managing opportunities for countryside living in rural areas in ways that provide for rural-residential development in close proximity to urban areas and the larger rural and coastal towns and villages while minimising the loss of rural production land.

With respect to the effects of the proposal on the protection of elite quality soils from urban expansion, the objectives and policies in B9.3 seek that new countryside living subdivision, use and development on land containing elite soil is avoided. However, it is noted that the subject site has been specifically zoned for Countryside Living, and therefore, it is considered that the Unitary Plan has established that the use of the subject site for non-productive land uses is appropriate.

With respect to managing reverse sensitivity, Policy B9.2.2(2) notes that this should be achieved by preventing sensitive activities from establishing in areas where rural production activities could be adversely affected or requiring sensitive activities to adopt on-site methods to avoid reverse sensitivity effects on rural production. For the reasons set out in Section 7.2.2 of this application, the proposal is not anticipated to result in reverse sensitivity effects in relation to ongoing use of nearby Rural Production zoned land for horticultural activities.

Objective B9.2.1(4) seeks that *“Auckland’s rural areas outside the Rural Urban Boundary and rural and coastal towns and villages are protected from inappropriate subdivision, urban use and development.”*

With respect to this objective, the activity of a school, is not defined as an “urban” use. As discussed within this application, the subject site is considered to be an appropriate site for the proposed activity, as it does not result in the use of residential zoned land which is in high demand to accommodate housing shortages, and provides for a character school in a location fairly central to its wide catchment in a manner that respects the rural character and amenity of the surrounding environment, the anticipated residential character of neighbouring zoned land, and where associated potential transport, stormwater, wastewater and reverse sensitivity effects can be suitably managed. Therefore, the proposed activity is not considered to constitute an “inappropriate” use of the subject site.

Overall, having considered the broader policy framework of the RPS holistically, it is considered that the proposed development is not inconsistent with the policy direction of the RPS, taking into account the zoning of the site (which anticipates non-productive land uses in a more spacious environment and at lower densities than an urban zone), the context and location of the site, and the nature of the activity, being a character school that draws children from a wide catchment.

7.4.3 National Environmental Standards

The only National Environmental Standard considered to be of relevance to the proposal is the *National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health*. This has been considered as follows.



1. National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health

The National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health applies to activities (including subdivision) on land on which an activity or industry described in the *Hazardous Activities and Industries List* is being undertaken on, has been undertaken on, or it is more likely than not that a HAIL activity is being or has been undertaken on the site.

A PSI has been prepared for the site which identifies that the site has been used for HAIL activities in the past, and presently. However, the PSI states that based on sample testing the soils are expected to present a very low risk to human health, and that for that reason, the proposed change of land use to a school would be a Permitted Activity.

It is noted that Council has requested a Detailed Site Investigation to support the earthworks consent which has been sought separately, requesting more intensive sampling be undertaken. This work has been commissioned and the final report will be provided to Council upon completion. As the earthworks will be undertaken prior to the activity at the site, it is not considered that further consent for the remediation of any contamination is required as part of this application, as it will be covered by the earthworks consent. However, a condition of consent would be accepted stating that operation of the school cannot commence prior to confirmation that contaminant levels at the site are below the required levels for residential activities.

7.4.4 National Policy Statements

Assessment of the proposal against the relevant National Policy Statements is provided as follows.

1. The National Policy Statement for Freshwater Management

The stormwater management approach for the site employs water sensitive design through providing for at source retention and detention of stormwater from the development. These measures combined with treatment for carpark and access areas will ensure that any stormwater discharges from the site on the downstream receiving environment will be no more than minor and consistent with best practice. Therefore, it is considered that the proposed development will be consistent with the relevant objectives and policies of the National Policy Statement for Freshwater Management.

7.5 Other Matters for Consideration

Section 104(1)(c) of the RMA specifies that, when considering an application for resource consent, consent authorities must have regard to any other matter they consider relevant and reasonably necessary to determine the application. Without limiting the Council's ability to consider any matter (in combination with their general discretion due to the application being for a discretionary activity), there are not considered to be any other matters for which assessment is considered necessary as part of this resource consent application.



7.6 Part 2 of the RMA

Overall, as set out in section 104(1) of the RMA, any application for resource consent is subject to Part 2 of the RMA. Part 2 of the RMA sets out the purpose and principles (sections 5 to 8), which are to be considered when applying the RMA. These matters have been considered as follows.

7.6.1 Section 5 – Purpose

Section 5 in Part 2 of the RMA identifies the purpose as being the sustainable management of natural and physical resources. This means managing the use of natural and physical resources in a way that enables people and communities to provide for their social, cultural and economic well-being while sustaining those resources for future generations, protecting the life supporting capacity of ecosystems, and avoiding, remedying or mitigating adverse effects on the environment.

This application is considered to be consistent with this purpose, in particular the proposal seeks to enable the wellbeing (social and cultural) of people and communities in Pukekohe and the surrounding rural area and neighbouring towns/suburbs through providing a Christian primary school and childcare centre to provide for the educational needs of those persons seeking that character of school. The location of the school is fairly central to its wide catchment of students and is located on land of sufficient size to accommodate the school.

The proposal provides for the efficient use of land specifically identified for Countryside Living, rather than productive rural land uses. The development avoids or mitigates potential adverse effects on the use and development of nearby land zoned for rural production for that purpose (including horticultural land uses), recognising the importance of maximising the life-supporting capacity of soils within that zone, and overall avoids or mitigates adverse effects on the environment, as outlined in Section 7.2 of this report.

Measures to ensure this include upgrading of the adjacent road and intersections to accommodate existing and proposed traffic, management of wastewater and stormwater discharges onsite, stormwater detention and retention to mitigate potential downstream effects and recharge aquifers, and the design of proposed buildings and landscaping to maintain a rural character within the site.



7.6.2 Section 6 – Matters of National Importance

Section 6 of the RMA sets out a number of matters of national importance, specifically:

- (a) *The preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development:*
- (b) *The protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development:*
- (c) *The protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna:*
- (d) *The maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers:*
- (e) *The relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga:*
- (f) *The protection of historic heritage from inappropriate subdivision, use, and development:*
- (g) *The protection of recognised customary activities:*
- (h) *The management of significant risks from natural hazards*

In relation to the matters of national importance specified by section 6 of the RMA, the site does not contain and is not adjacent to any identified outstanding landscape or features, any historically significant sites or any waterways or waterbodies. Therefore, none of the matters of national importance are considered to be specifically relevant for the proposed activity.

Potential risks from natural hazards will be mitigated through suitable foundation design of buildings at Building Consent stage, and through providing for stormwater runoff through the site to be directed to the basin at the low point in the site; thus no buildings should be subject to flooding.

7.6.3 Section 7 – Other Matters

Section 7 identifies a number of 'other matters' to be given particular regard to, which are:

- (a) *Kaitiakitanga;*
- (aa) *The ethic of stewardship;*
- (b) *The efficient use and development of natural and physical resources;*
- (ba) *The efficiency of the end use of energy;*
- (c) *The maintenance and enhancement of amenity values;*
- (d) *Intrinsic values of ecosystems;*
- (f) *Maintenance and enhancement of the quality of the environment;*
- (g) *Any finite characteristics of natural and physical resources;*
- (h) *The protection of the habitat of trout and salmon;*
- (i) *The effects of climate change; and*
- (j) *The benefits to be derived from the use and development of renewable energy.*



This application has taken into consideration the 'other matters', and in respect of the above the following comments are made:

- With respect to kaitiakitanga and the ethic of stewardship, the proposal has been designed to generally accord with the provisions of the Plan, which take into account these matters. It is recognised that the discharge of wastewater to land is a matter of cultural interest to mana whenua and consultation will be undertaken with local iwi regarding the application accordingly.
- The proposal provides for the efficient use of the subject site to provide for the wellbeing of the community (both rural and urban areas). The location of the school outside of the adjacent urban area, which is zoned for residential activities, will maintain that land to be developed efficiently for the provision of housing to assist to address the Auckland housing shortage.
- Mitigation measures inherent in the application will ensure that reverse sensitivity effects on nearby horticultural activities (particularly those being undertaken within the Rural Production zone) will be avoided or mitigated, such that the proposal will not restrict the efficient use of productive soils for those activities.
- The school has been designed to maintain and enhance amenity values through the design and position of buildings to reflect rural form, colour and materials, and through landscaping to provide screening of paved surfaces.
- The proposal is considered to maintain the quality of the environment through ensuring that wastewater discharge is treated prior to discharge and discharged to land not water, and through managing stormwater runoff within the site, including groundwater recharge. Road upgrades proposed will ensure that the quality of the local road environment is improved in the vicinity of the site.
- Whilst the activity will result in a change in the use of the site, from a productive horticultural land use to a school, it is noted that the site has been identified as suitable for non-productive land uses; being primarily lifestyle living purposes. Therefore, the proposal is not considered to have adverse effects on finite characteristics of natural and physical resources that have not been contemplated through the planning processes that established the zoning of the site.
- The effects of climate change have been taken into consideration in the design of the on-site stormwater basin, which is sized to include additional capacity for climate change.

7.6.4 Section 8 – Treaty of Waitangi

Section 8 requires all persons exercising functions and powers under the RMA to 'take into account' the Principles of the Treaty of Waitangi. It is not considered that this proposal raises any Treaty issues.

7.6.5 Part 2 Conclusion

Overall, and for the reasons stated above, the proposal is considered to be in accordance with the purpose and principles of the RMA, as stated in sections 5 to 8 of Part 2.



7.7 Section 105 Considerations

Section 105 of the RMA requires that, for an application for a discharge permit, that Council shall have regard to the following:

- (a) *the nature of the discharge and the sensitivity of the receiving environment to adverse effects; and*

The proposal includes the discharge of wastewater and stormwater.

Stormwater discharge is in accordance with the Stormwater NDC for the catchment, being in accordance with the retention and detention requirements of the Pukekohe Hill Precinct. Therefore, any effects on the receiving environment are considered to be consistent with those contemplated, and potential adverse effects suitably avoided or mitigated.

Wastewater discharge on-site will be via a wastewater treatment and disposal system designed to meet the requirements of the activity and the soil conditions on site. A disposal field of the required size is provided in the southwestern part of the site. Cleanwater diversions are proposed around the disposal field to avoid any contamination of this runoff.

The discharge area takes into account the sloping topography of the site; and as such, all water discharged will naturally seep away from the adjacent site to the south, following the site contours. With respect to the site to the west, the proposed bund and existing overland flow channel along the site boundary will mitigate any potential effects of wastewater discharge on the soils on the adjacent site.

The loading rates will ensure that the system operates in a manner that ensures that any other actual and potential effects on soils or groundwater beyond the subject site is avoided or mitigated.

- (b) *the applicant's reasons for the proposed choice; and*

The applicant is proposing onsite wastewater discharge as onsite treatment and disposal is the best practicable option to address wastewater in a rural zone and there is no public wastewater infrastructure connection to the site. Extending a public connection to the site is not economically viable and it is understood there are current capacity constraints in the public network. There is sufficient disposal area available on the subject site to meet the needs of the activity.

- (c) *any possible alternative methods of discharge, including discharge into any other receiving environment.*

The applicant has considered discharge of wastewater into the public wastewater system, however, the existing public wastewater infrastructure is located some 600m away and it is not economically viable to extend that network to the subject site. In addition, it is understood that there are currently network capacity issues to be resolved for Pukekohe. Therefore, onsite disposal has been deemed to be the most practicable option. At such time that the adjacent residential land has been developed and wastewater infrastructure has been extended to near the school boundary, it may be appropriate for the school to connect into the public system, provided that there is sufficient capacity.



7.8 Section 107 Considerations

Section 107 of the RMA states that Council shall not grant a discharge/coastal permit if, after reasonable mixing, the contaminant or water discharged is likely to give rise to all or any of the following effects in receiving waters:

- (c) *the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials:*
- (d) *any conspicuous change in the colour or visual clarity:*
- (e) *any emission of objectionable odour:*
- (f) *the rendering of fresh water unsuitable for consumption by farm animals:*
- (g) *any significant adverse effects on aquatic life.*

Given that the proposed discharge of wastewater is to ground from a treatment system, and that stormwater runoff will either be clean stormwater from roofs or treated stormwater from parking and loading areas, the above effects will not have adverse effects on the receiving waters. Therefore, Council may grant the sought discharge permit.

7.9 AEE Conclusion

With reference to the assessment of effects above, it is considered that the effects of the proposal will be no more than minor and any potential adverse effects can be appropriately mitigated through mitigation measures inherent in the application and standard conditions of consent.

8. Consent Conditions

There are a number of mitigation measures that inherently form part of the proposal and that may be appropriate matters for consent conditions to manage the effects of the proposed activity. In this regard, it is suggested that conditions of consent should address the following matters:

- Require that the following works be completed prior to operation of the school:
 - Site access and carpark 1;
 - Stormwater attenuation basin and associated pipe network from impervious areas;
 - Wastewater treatment system of sufficient size for the number of students.
 - Upgrading works proposed along Blake Road and at the intersection with Foy Road and Calcutta Road as shown on the Engineering Plans.
 - Footpath along Blake Road connecting the subject site to the existing footpath on Rowles Road;
- Limit the number of children permitted to attend the school to 190 children until such time that carpark 2 is completed and operational;
- Limit the total number of children permitted to attend the school to 450 children.



- Limit the total number of children permitted to attend the childcare centre to 60 children, and restrict operation of the childcare centre until such time that carpark 2 is completed and operational.
- That the southern vehicle access to the site be entry only and clearly marked as such, and that the northern vehicle access be exit only and clearly marked as such.
- That lighting be installed for all parking and access areas in accordance with the standards in E24.6.
- That a travel management plan shall be developed and implemented within 6 months of the operation of the school commencing.
- That confirmation from a qualified contamination expert that all soils within the development area meet the permitted levels for residential activities, prior to the occupation of the school. If any remediation is required, this shall be undertaken and a validation report provided to the satisfaction of Council, prior to the operation of the activity.
- That a final landscape plan be provided for the approval of Council, clearly depicting works to be completed for Stage 1 and works to be completed for Stage 2.
 - Stage 1 works shall include landscaping around the two Stage 1 classroom blocks, around carpark 1, within the stormwater basin and around the effluent disposal area. All works to be completed for Stage 1 shall be implemented prior to the operation of the school commencing.
 - Stage 2 works shall comprise the balance of landscaping works across the site. All works to be completed for Stage 2 shall be completed prior to the occupation of the Stage 2 buildings.

9. Consultation

9.1 Neighbours

The applicant has undertaken consultation with the adjacent neighbour to the west of the site, being the Flynn Brothers. This included specific consideration of the potential noise effects of the proposal, including an infringement to noise standards along the common boundary. Affected Party Approval was granted by this neighbour subsequently (refer Appendix 14).

9.2 Iwi

Consultation will be progressed with iwi following lodgement of the application, particularly in relation to the proposed on-site wastewater discharge, now that the proposed design parameters for this aspect of the proposal have been confirmed. Any feedback received will be provided to Council upon receipt.



9.3 Local Board

Feedback has been received from the Franklin Local Board in relation to the earthworks application lodged separately for the site, which also includes comments on the intended use of the site for a school. A copy of the comments is attached at Appendix 15.

With respect to the matters raised by the Local Board, the potential effects of the location of a school at the subject site, including potential reverse sensitivity effects on neighbouring properties in horticultural use have been considered within this application. Overall, due to the design and layout of the school and proposed landscaping, it is considered that any reverse sensitivity effects will be avoided or mitigated.

Whilst it is proposed to seek approval from Watercare for a connection to the reticulated water supply system, the use of onsite rainwater collection tanks is a feasible option that can be progressed if need be. This would not impact on the availability of water for neighbouring agricultural activities. The development does not propose to utilise bore water or surface water.

Noise-sensitive teaching spaces have been located adjacent to the residential boundaries of the site, minimising any potential for noise generated by agricultural activities to impact on the school activities. In this regards the classrooms can be designed to ensure a suitable internal noise environment.

An assessment of the proposal with respect to the relevant objectives and policies of the Unitary Plan has been undertaken in Section 7.3 and 7.4.2 of this report.



10. Notification

10.1 Public Notification

Section 95A of the RMA specifies whether a resource consent application should be publicly notified.

10.1.1 Step 1: Mandatory Public Notification in Certain Circumstances

In relation to sections 95A(2) and 95A(3) of the RMA, the applicant does not request public notification of the application. In accordance with section 95A(2)(a), consideration of whether to publicly notify the application proceeds to step 2.

10.1.2 Step 2: Public Notification Precluded in Certain Circumstances

In relation to sections 95A(4) and 95A(5) of the RMA, there are no rules that preclude public notification of any of the proposed activities, the application is not for the subdivision of land or a residential activity, the application is not exclusively a boundary activity and there are no regulations that specify the proposal to be a prescribed activity. In accordance with section 95A(4)(b), consideration of whether to publicly notify the application proceeds to step 3.

10.1.3 Step 3: Public Notification Required in Certain Circumstances

In relation to sections 95A(7) and 95A(8) of the RMA, there are no rules that require public notification of any of the proposed activities and the activity will not have and is not likely to have adverse effects on the environment that are more than minor for the following reasons:

- Traffic effects of the proposal on the surrounding road network have been assessed as being no more than minor;
- The proposal is not considered to result in reverse sensitivity effects in relation to existing activities in the nearby Rural Production zone.
- Adverse effects on rural character and amenity values are considered to be no more than minor due to the design and layout of the proposed buildings and activities within the site.
- Stormwater and wastewater discharges from the site will be managed in a way that ensures that effects on the downstream receiving environment will be no more than minor.
- There are no sensitive receiving environments or areas of identified specific value located within proximity of the subject site.
- The proposal will not result in adverse noise effects on the wider environment.
- Stormwater flows will be managed to ensure that the proposed development will accommodate upstream overland flows through the site and will not result in adverse flooding effects on any downstream properties.

The assessment above has, in accordance with section 95D, disregarded effects on:



- the land to which the application relates;
- any adjacent properties (listed in Table 2, below);
- any person who has given written approval to the application (listed in Table 3, below, and provided in Appendix 14); and
- trade competition.

Table 2: Adjacent properties upon which effects are disregarded

Allotment 80 and Allotment 270 PSH of Pukekohe	Pt Lot 2 DP 18328
Allotment 81 PSH of Pukekohe	Lot 1 DP 106868
Pt Allotment 195 and Pt Allotment 196 PSH of Pukekohe	Pt Allotment 207 PSH of Pukekohe (60 Blake Road)

Table 3: Written approvals obtained

Person	Site Address	Relationship to Site
Flynn Brothers Ltd	Pt Allotment 195 and Pt Allotment 196 PSH of Pukekohe	Owner and Occupier

In accordance with section 95A(7)(a), consideration of whether to publicly notify the application proceeds to step 4.

10.1.4 Step 4: Public Notification in Special Circumstances

In relation to section 95A(9) of the RMA, there are considered to be no special circumstances that would warrant public notification. In accordance with section 95A(9)(b), it shall then be considered whether to give limited notification of the application under section 95B.

10.2 Limited Notification

If the application is not publicly notified, Section 95B of the RMA specifies whether a resource consent application should be given limited notification.

10.2.1 Step 1: Certain Affected Groups and Affected Persons Must be Notified

In relation to sections 95B(2), 95B(3) and 95B(4) of the RMA, the activity is not considered to result in any affected protected customary rights groups, affected customary marine title groups or affected person to whom a statutory acknowledgement is made.

10.2.2 Step 2: Limited Notification Precluded in Certain Circumstances

In relation to sections 95B(5) and 95B(6) of the RMA, there are no rules that preclude limited notification of any of the reasons for resource consent, the application is for a discretionary activity and there are no regulations that specify the proposal to be a prescribed activity. In accordance with section 95B(5)(b), consideration of whether to give limited notification of the application proceeds to step 3.



10.2.3 Step 3: Certain Other Affected Persons Must be Notified

In relation to sections 95B(7), 95B(8) and 95B(9) of the RMA, it is not considered that any persons will be directly adversely affected by the use of the site for the proposed activities as all potential adverse effects of the proposal in relation to adjacent sites and specific persons are considered to be less than minor for the following reasons:

- Traffic generated by the activity can be accommodated on the adjacent road network (with limited proposed upgrades to Blake Road and the Blake/Foy Road intersection) in a manner that does not restrict access to adjacent properties;
- The proposal can comply with the relevant acoustic standards, with the exception of the adjacent site to the west and that landowner has provided affected party approval;
- Stormwater runoff will be managed within the site to ensure downstream discharges are managed to pre-development levels;
- Wastewater discharges to the site will be treated in accordance with best practice to minimise the application of contaminants to land and the location of the disposal field will ensure that any potential spread of contaminants is contained within the site, noting that the site is downhill and downwind of adjacent horticultural sites to the south and west.
- Existing and proposed vegetation will assist to screen the proposed activity from adjacent rural land uses and mitigate potential reverse sensitivity effects.
- Any other reverse sensitivity effects are considered to be less than minor.
- Proposed works on the road will be fully contained within the road reserve and will not require works on private third party land.

The assessment above has, in accordance with section 95E, disregarded effects that are permitted by a rule or by a national environmental standard (refer section 5.3, above), and effects on any person who has given written approval to the application (listed in Table 3, above and provided in Appendix 14).

Therefore, there are no persons for which the application is to be notified pursuant to section 95B(9).

10.2.4 Step 4: Further Notification in Special Circumstances

In relation to section 95B(10) of the RMA, there are considered to be no special circumstances that would warrant limited notification to any other person.

10.3 Notification Determination

Following the steps outlined in sections 95A and 95B of the RMA, it is determined that the proposal is not required to be publicly notified nor should limited notification be given to any groups or persons.



11. Conclusion

The assessment of the proposed primary school and early childcare centre at 58 Blake Road, Pukekohe, above has included an assessment against the matters set out in Schedule 4 of the RMA, applicable planning instruments and relevant matters under sections 95 and 104 of the RMA.

That assessment has concluded that:

- The proposal does not require public notification or limited notification;
- Any actual and/or potential adverse effects on the environment generated by the proposal are no more than minor; and
- The proposal is consistent with the environmental outcomes contemplated by the relevant planning documents and consistent with the purpose and principles of the RMA.

Overall, and in accordance with sections 104, 104B, 105, 107 and 108 of the RMA, the application should, subject to appropriate conditions, be granted. Suggested matters to condition have been outlined in Section 8 of this application.

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APPENDIX 1

Locality Diagram



APPENDIX 2

Certificate of Title



APPENDIX 3

Statement from Kingsway Trust



APPENDIX 4

Architectural Plans

(Bound Separately)



APPENDIX 5

Design Statement



APPENDIX 6

Engineering Plans
(Bound Separately)



APPENDIX 7

Stormwater Report



APPENDIX 8

Wastewater Details



APPENDIX 9

Geotechnical Report



APPENDIX 10

Integrated Transportation Assessment



APPENDIX 11

Preliminary Site Investigation



APPENDIX 12

Acoustic Report



APPENDIX 13

Development Standard Tables



APPENDIX 14

Written Approval



APPENDIX 15

Local Board Comments

