



TOWNPLANNING GROUP

Our Ref: 2638-21

12 September 2022

Jane Anderson
Consultant Planner
Selwyn District Council
ROLLESTON

VIA EMAIL: jane.anderson@selwyn.govt.nz

Tēnā koe Jane,

D220002 – MINISTER OF EDUCATION NOTICE OF REQUIREMENT: ROLLESTON SECONDARY SCHOOL RESPONSE TO FURTHER INFORMATION REQUEST

This letter is in response to your emails dated 18 and 21 June 2022 in which you requested further information ('RFI') in relation to the above Notice of Requirement ('NOR'). We note that a number of matters associated with the RFI were discussed or clarified at our meeting on the 21 June 2022. The following however responds to the points raised within the RFI, with the specific RFI points repeated for clarity.

1 GENERAL

Campus of Rolleston College

It is noted that the proposal seeks to operate the secondary school as a second campus of the existing Rolleston College. Please can you advise how this will function and whether interaction between the two campuses will result in increased traffic movements, and if so how this might be mitigated (for example, improved walking and cycling facilities).

As discussed at our 21 June 2022 meeting, the established Rolleston College Board of Trustees will be the governing entity for the new school. Although an operational split of the two schools to reflect a separate Junior and Senior campus is under consideration, a specific year split has not been confirmed¹. The Ministry of Education ('Ministry') project brief is

¹ i.e. a Junior campus for Years 9-10 or 9-11, or a Senior campus for Years 11-13 or 12-13. The decisions in relation to this remain subject to consultation, and potential outcomes arising from the NCEA Change Programme.

however to establish a full standalone secondary school facility with all relevant educational facilities provided (i.e. gymnasium, playing fields, hard courts, administration and teaching blocks etc). To this end, the assessment provided in support of the NOR has assessed the traffic effects of a fully functional secondary school facility with a master planned role of 2,200 students, a satellite primary school of 300 students, along with an early childhood education centre and a Hangarau specialist teaching space / facility. We note that Abley have considered the traffic implications arising from a potential split campus arrangement, finding that their assessment and modelling provided within their Integrated Transport Assessment ('ITA') is highly conservative, remains appropriate, with matters of detail able to be considered as part of a future Outline Plan of Works ('OPW') (refer their response enclosed as **Attachment [A]**).

It is considered that should a split campus be determined and advanced by the Ministry and the Board of Trustees, movement between the two campuses, would be limited to, for example, a specific learning module or sporting event, which would see specialist teachers and/or students move from one campus to the other at designated times. Any traffic movements associated with this would likely be negligible, occurring outside of the peak traffic hour. Further, a high quality shared path is provided along Springston Rolleston Road between Rolleston College and the new secondary school, with a pedestrian crossing located north of Lady Isaac Drive providing a safe and direct connection to the pedestrian network within the Faringdon West Village development.

We note the NOR has advanced designation conditions that require the preparation of a 'Transport Management Plan' ('TMP') and a School Travel Plan, with these required to, amongst other things, identify the initial goals with respect to sustainable travel modes, including specifying measures to reduce vehicle dependence. These tools are considered to provide an effective management approach that avoids and/or responds to any actual and potential traffic related effects, and connectivity issues, associated with future development of the site.

For completeness, we note that the Ministry have recently undertaken a further roll growth estimate for secondary aged children in Rolleston, with this taking into account historical data and trends, and recent growth projections. The estimates of potential roll growth scenarios out to 2028, having regard to the potential campus arrangements and year split configurations under consideration, are summarised as follows:

- The Year 9-10 roll is likely to be between 1000-1100 in 2028, and the Year 11-13 roll is likely to be between 1300-1500 in 2028.
- The Year 9-11 roll is likely to be between 1500-1640 in 2028, and the Year 12-13 roll is likely to be between 800-930 in 2028.

As evident from the above, if a Senior campus is advanced for the new school site, the expected student roll at 2028 will be in the order of 1300-1500 or 800-930, depending on the



particular year split configuration advanced. It is considered that these roll growth estimates demonstrate that the student roll figures assessed in the NOR and the transportation modelling are conservative in the short to medium term, with the master planned roll figures not expected to be realised until well beyond 2028.

Activities outside of school hours

It is noted that the proposed conditions provide a level of flexibility for noise levels for activities occurring on a Saturday. Please provide further information.

The Ministry 'standard' noise designation condition provides a degree of flexibility for activities to occur on a Saturday, with this reflecting the common and regular utilisation of school playing fields for school sport / recreation on Saturdays (by both students and the community). This is considered a standard and practical outcome, and one that the Ministry has established within their educational purpose designations over the last several years. It is noted that this provision is reflected within the 'Standard Conditions for All Education Designations' contained within the Auckland Unitary Plan, and also within a number of educational purpose designations in the Proposed Selwyn District Plan (e.g. MEDU-30 Acland Park School, MEDU-17 Rolleston College and others).

2 TRANSPORT

With respect to the various transport related points of the RFI, Abley have considered the matters raised, with their response enclosed as **Attachment [A]**. This response should be referred to for a technical response to the transport matters raised, with the following providing further commentary where relevant in order to provide a comprehensive response to the matters raised within the RFI.

Para 2.1: The ITA notes that the site "is located in the Faringdon South-East subdivision". However the application to the EPA shows that this area was not included, as shown below. It is also not within the site boundaries of the approved EPA plan of the area: Please clarify this comment in the ITA.

The site forms an integral part of the Faringdon 'West Village'² development, with the site located in the south eastern corner, with access afforded to internal roads within the development. The site formed part of the project that was referred to an expert consenting panel in April 2021³ by the Minister for the Environment, with this providing for an 'either/or' scenario involving:

- 3(1)(a) either –
 (i) a subdivision of up to 1,089 lots and 1,087 residential units; or
 (ii) if a secondary school is developed in the location of the project, a subdivision of up to 959 lots and 957 residential units'.

² Faringdon South East has been developed as 'West Village', with Faringdon South West developed as 'Westwood'

³ Schedule 16, Faringdon South West and South East Development, COVID-19 Recovery (Fast-track Consenting) Referred Projects Order 2020.



However, the site did not form part of the subsequent application to the Environmental Protection Authority ('EPA') as the acquisition discussions with the Ministry were sufficiently progressed such that there was no need for the site to be included and assessed as part of the application to the EPA⁴.

Para 2.4: The ITA notes that "roundabout control is proposed at Springston Rolleston and Selwyn Road intersection". It is understood that there is presently no funding available for this scheme, and therefore please provide comment as to potential effects at this intersection if the schools were to open with the current intersection geometry remaining in place.

Please refer to the response from Abley contained as **Attachment [A]**. In addition to this, we provide the following further commentary.

We understand that the intersection of Springston Rolleston Road and Selwyn Road has a well-documented poor safety record, with a roundabout upgrade considered necessary to enhance safety outcomes, particularly recognising the increasing safety risks associated with ongoing urban growth and additional traffic in the locality. It is understood these safety risks and the need for an upgrade to this intersection are irrespective of the NOR, with the Rolleston Transport Model already identifying the provision of a roundabout at this intersection.

It is acknowledged that based on our investigations, there does not appear to be funding allocated for the upgrade of this intersection. However, we understand that the issue of funding and monetary / land contributions to facilitate the upgrade of this intersection were canvassed as part of the application to the EPA, broadly summarised as follows:

- The formal written comments from Selwyn District Council ('SDC') on the EPA application identified that:
 - based on previous discussions with the Waka Kotahi, that the upgrade should occur in the 2024-2027 period, based on normally expected future traffic use and increasing safety issues⁵.
 - the developer should share in these costs to upgrade the intersection as a condition of any 'fast track' approval, as this upgrade needs to occur sooner to address safety issues as traffic will increase earlier than expected.
- The Applicant's formal response to SDC's written comments relating to the upgrade of the intersection identified that:
 - A number of discussions on the upgrade of this intersection occurred through Private Plan Change 64, with this including engagement with SDC around the design and layout of the roundabout. The response included an email train

⁴ <https://www.epa.govt.nz/fast-track-consenting/referred-projects/faringdon/>

⁵ Paragraph 61, SDC Written Comments - [20Jul21 Selwyn District Council FTC32 Comments Received Redacted.pdf](#) ([epa.govt.nz](https://www.epa.govt.nz))



clarifying the land requirement for the roundabout (and subsequent provision by the developer), the initial concept designs, and confirmation from SDC that the roundabout was proposed for 2024-2026, with timing and funding approval expected for the Long Term Plan in 2024 (also noting a need to coordinate with any Waka Kotahi requirements for funding).

- A condition requiring a 'Developer Agreement' in respect of the upgrade was accepted, with this contingent on the understanding that the contribution to the roundabout upgrade was proportionate to the volumes originating from the development and other developments within the area, to ensure a fair and equitable contribution from all related parties.
- The decision from the EPA did not specify a need to upgrade the intersection as part of the development, but did include a condition requiring a 'Developer Agreement' to be entered into, with this condition reading as follows:

Intersection upgrades – Developer Agreement

26. A Developer Agreement shall be entered into between Selwyn District Council and the Consent Holder for the Springston Rolleston Road and Selwyn Road intersection roundabout. The agreed costs should be proportionate to the volumes originating from Faringdon South East and other developments within the area to ensure a fair and equitable contribution.

The status of the Developer Agreement is unclear at this point in time, however, based on the above, it would appear that a number of funding streams have been identified which would facilitate the upgrade of the intersection, which is expected to occur around the 2024-2026 period.

In any event, the performance of the intersection based on its existing arrangement / geometry and the 'full' school roll has been modelled by Abley, as outlined in their response enclosed as **Attachment [A]**. The result of this assessment is that the intersection will operate at LOS E in the critical morning peak period (associated with the Selwyn Road west approach), a change from LOS B associated with the baseline volumes. Abley note that this assessment is conservative, noting that it is based on the total school roll, which is not expected to be achieved for many years, as supported by the recent roll Ministry growth estimates detailed under **POINT 1** of this response. To this end, the intersection performance is expected to be higher than that identified by the modelling.

For the reasons outlined above, there is considered to be a relatively high degree of certainty that this intersection will be upgraded to a roundabout in the near future, with this required to address existing (and future) safety concerns, as well as intersection capacity performance. This need is considered irrespective of the NOR. Given the relative certainty of the intersection upgrade, the timing of future school development, and the assessment of Abley, the Ministry does not consider there is a need for the NOR to address the same (by way of designation condition).



Para 3.2: Please comment on the ability of Hungerford Drive and Road 1 to accommodate additional traffic associated with the schools (or alternatively, should access to the school site be prohibited from either/both?).

As outlined in the response of Abley enclosed as **Attachment [A]**, both Hungerford Road and Eileen Way ('Road 1') are able to accommodate traffic associated with future educational development on the site. To this end, no designation condition restricting access to these roads is considered necessary. The most appropriate time to consider matters of detail relating to site access is considered as part of a s176A OPW⁶, when the overall design of the school, including access locations, parking provision and building locations have been determined.

Para 3.2: It is noted that "buildouts could be considered in the future near the school to facilitate a pedestrian crossing". Please advise whether this measure is proposed as part of the provisions of the designation. On the same topic, the ITA mentions a number of transportation provisions that are assumed to be implemented on the roading network. However it is important that there is certainty that any measures that are relied upon will indeed be implemented. To that end, please provide details of what roading/transportation measures are proposed to form part of the designation conditions, which measures are confirmed as being provided by others, and which are not confirmed or funded. By way of just one example (and there are many others), under para 3.4 it is noted that "any surrounding intersections should also have pedestrian crossing points on desire lines to encourage active travel to the school site". Who is responsible for implementing these?

Please refer to the response from Abley enclosed as **Attachment [A]**. We note that this response outlines a range of infrastructure works (constructed and future) around the site, including identifying the lead responsibility in relation to those works.

It should be noted that the NOR is for the designation of the site for educational purposes only. There is currently no detailed information available around the master planning and future site development such as the location of school buildings, sport fields and associated access and parking. In any event, the NOR has advanced a designation condition that requires the preparation of a TMP, which is required to identify and address the following:

- a. sets the initial goals of the school with respect to sustainable travel modes and the mitigating real and potential adverse traffic effects;*
- b. ensures sufficient access and off street car parking, including for drop off and pick up, and bus parking, is provided;*
- c. facilitates the integration of the school with the surrounding transport network (including pedestrian and cycling access to the site);*
- d. provides an assessment, if no school travel plan has been provided, as to how a school travel plan would be developed.*

The TMP is required to be developed in consultation with the Asset Manager Transportation for SDC, providing a further opportunity for engagement in terms of the integration of the

⁶ s176A(3)(d) and (f) requires an Outline Plan to show 'the vehicular access circulation and the provision for parking' and 'any other matters to avoid, remedy or mitigate any adverse effects on the environment', with these considered sufficient to address any detailed transportation queries or concerns associated with future school development on the site.



future school development with the surrounding transport network. It is considered that these discussions are best undertaken as part of the OPW process when specific design matters are determined, as opposed to the present NOR process.

Para 3.3. It is noted that the site was previously expected to have 161 lots, as noted above but under the application to the EPA, the site was not included within Faringdon South-East. Please clarify (this matter might be more easily addressed under the first point above).

As outlined earlier, the site formed part of the project that was referred to an expert consenting panel by the Minister for the Environment, with the development options provided as part of the referral application outlining an alternative residential layout for the site if a secondary school was not developed. Further to this, and to inform acquisition / valuation discussions with the developer, an indicative development layout was prepared for the site which provided for in the order of 161 residential allotments, with this outcome broadly in line with the density outcomes established within the wider Faringdon development(s).

We note that discussions with SDC Planning Staff have confirmed that the site (and wider West Village development) will be rezoned to Medium Density Residential as part of the variation to the Proposed Selwyn District Plan, to be notified on 20 August 2022. This outcome would provide an opportunity for a range of high-density residential outcomes across the site.

Para 3.6. Please comment on whether, because of travel patterns being suppressed due to Covid-19 related restrictions, a slightly longer timeframe should be considered for the safety assessment.

Please refer to the response from Abley enclosed as **Attachment [A]**.

Para 5. It is noted that the specialist hub will operate outside of school hours – however, is this confirmed, and will there be a condition on the designation to ensure this? If not, please comment on whether the traffic should be taken into account.

The designation purpose is broadly cast for 'educational purposes', with this providing for a range of activities across the site, including changes in use over time. A specialist hub / technology centre is a relatively standard education facility for the Ministry, with these specialist teaching spaces used by students during school hours, and in some cases, for community education outside of school hours. The details around the specialist hub in terms of its location within the site, and its scale and intensity of use has yet to be determined. However, consistent with other facilities its use will not coincide with peak school drop off / pick up times, with students from other schools arriving and departing via bus outside of regular school start and finish times.

Further to the above, it is noted that the site area and multiple road frontages provide a number of opportunities to safely and efficiently manage traffic movements, and assist in the ability to avoid and mitigate any actual or potential adverse effects on nearby sensitive



receivers. To this end, no designation conditions are considered necessary to manage the activities associated with the specialist hub, with any matters of detail and mitigation most appropriately considered as part of the OPW.

Para 5. Please clarify whether the figures in the tables are one-way trips or two-way (that is, whether the 903 trips reflect 903 vehicles entering and 903 vehicles exiting, or 451 vehicles entering and 451 vehicles exiting). With 1,041 students travelling by car, 903 vehicles entering would mean an average of 1.15 students per car, whereas 451 vehicles entering would mean an average of 2.3 students per car. The latter seems very high...?

Below Table 5.3 is a comment regarding pass-by trips, shared travel etc. Please confirm whether any reductions have been made for this.

Please refer to the response from Abley enclosed as **Attachment [A]**.

Para 6.2 notes it is “highly recommended” to link the existing shared path networks on Selwyn Road (school side) and Springston Rolleston Road (opposite side) to the school site. Please advise as to the responsibility for providing this connection.

The continuation of the shared path along Selwyn Road will be determined as part of master planning and detailed design of the school, with the need and extent of this informed by the locations of access, parking and building areas on site. Any extension to the shared path network along Selwyn Road will be undertaken by the Ministry in consultation with SDC (an outcome anticipated to occur through the TMP requirement advanced by the NOR).

As identified, there is an existing shared path network along Springston Rolleston Road (on the opposite side of the road), with an existing pedestrian refuge island located north of Lady Isaac Drive. This provides a pedestrian linkage from the east through to the internal shared path network established within the West Village and wider Faringdon development. Based on the current transport environment along Springston Rolleston Road, this outcome is generally considered preferable from a safety perspective than the provision of an additional shared path along Springston Rolleston Road (on the school side). It is considered that any further decisions around pedestrian linkages along Springston Rolleston Road are most appropriately undertaken as part of the future roundabout upgrade at the Springston Rolleston Road and Selwyn Road intersection.

Please refer to the response from Abley enclosed as **Attachment [A]** for further details and commentary in relation to this matter.

Para 6.2 also notes the provision of a Kea Crossing. Again, please advise of the responsibility for implementing any works associated with this.

The provision of a kea crossing would be associated with a primary school facility, as opposed to the secondary school, which is the initial and principal build component advanced by the Ministry. The details associated with a key crossing would be determined as part of a future OPW when building locations and access arrangements are defined, and would involve



engagement with SDC. In this regard, the NOR requires the TMP to be reviewed at the time of each OPW that involves an increase in student capacity of more than 100 students. As such, there is certainty that a future primary school development would involve engagement with SDC, where the appropriate details and responsibilities around the provision of a key crossing can be determined as/if required. Please refer to the response from Abley enclosed as **Attachment [A]** for further details.

Para 6.4. Given that NPS-UD has now removed parking ratios, please comment on the number of on-site spaces that will be provided and whether a parking ratio will form part of the designation conditions.

The provision of parking on the site will be informed through master planning, outcomes of consultation with the school faculty, Ministry policy around active travel measures and parking provision (including directions in response to the NPS-UD), and expert transport advice. These matters will be determined as part of the future OPW, and given the large site area and multiple road frontages, sufficient parking areas will be able to be accommodated on site as necessary.

It is noted for completeness that the TMP requirement of the NOR will set the parameters around parking on site, with a subsequent designation condition advanced by the NOR requiring on-site car parking spaces to be provided in accord with the TMP.

Para 6.5. Since having a pedestrian access onto Springston Rolleston Road is not appropriate, will this be prohibited through the designation conditions?

Given the ongoing urban growth and development in the immediate locality, and the opportunities associated with future potential changes in the transport network, it is not considered appropriate to prohibit or prevent pedestrian access to Springston Rolleston Road at this point in time. By way of example, a reduction in speed limits and/or improvements in transport infrastructure in the immediate vicinity would enhance safety for pedestrians and cyclists, which may make such an outcome appropriate. It is considered appropriate for the NOR to provide flexibility in this regard, noting the TMP requirement provides an opportunity for engagement with SDC in terms of pedestrian and cycling access to the site.

Para 7. The traffic model is stated has having been set up with Selwyn Road being the main access. However para 6.5 says that "the main entrances to the school which will cater for the largest traffic volumes would be recommended to be on Selwyn Road or Hungerford Road". If that's the case, has a scenario been tested assuming Hungerford Drive to be a main entrance?

Para 7. Please can further details be provided of the new school travel model. If it is relied upon, but has not been subject to testing (or indeed publication) then can it be considered to be reliable?



Para 7. Has the primary school arrival data been applied to the high school? If so, what basis has been used for assuming that the patterns of primary school and high school trips are the same?

Please refer to the response from Abley enclosed as **Attachment [A]**.

3 NOISE

The NOR is titled Rolleston Secondary School, but the overall site description includes various educational activities for different age groups. As there is no indicative bulk and location study to review, or noise assessment to review, how is the cumulative noise from all activities which the limits do apply to – e.g. mechanical plant, evening activities etc (including the Secondary School, ECE, Primary School and Technology Hub) going to designed to ensure compliance, especially if there is a staged design for the different activities on site?

The NOR has advanced the Ministry 'standard' noise condition for its educational purpose designations, with this prescribing a noise envelope for all activities (i.e. mechanical plant, on-site vehicle movements, educational activities etc) occurring within the designation. To this end, the various activities and facilities on site will be required to comply with the specified noise limits, with this required to be demonstrated as part of any future OPW's. In the instance that compliance is unable to be achieved for any specific activity, or for a later stage of development, an alteration to the designation would be required to modify the noise requirements as appropriate.

It is noted that only those activities captured by the 'educational purpose' of the designation would be afforded with the benefit of the noise condition advanced within the NOR, with development on the site controlled by the Minister of Education as the Requiring Authority. In this regard, the Ministry owns one of the largest property portfolios in New Zealand, with a series of specific and comprehensive requirements and guidelines in place to manage school design and development⁷. The acoustic performance of educational buildings is given particular regard as part of the design review process⁸, including the requirement to consider and implement measures to address exterior noise and interior noise elements. To this end, it is considered the Ministry is well placed to ensure appropriate management of noise from the site, with further information able to be provided in relation to this as part of the future OPW process.

It appears that noise from mechanical plant (associated with HVAC and specialist extract systems from say the Hangarau facility) and traffic noise associated with the education activity would need to comply with the noise limits during both the daytime and night time period. Is that correct?

As outlined above, the Ministry 'standard' noise condition sets an envelope for which all the activities on site are required to achieve compliance. In the instance that the mechanical

⁷ <https://www.education.govt.nz/school/property-and-transport/projects-and-design/design/design-standards/designing-schools-in-aotearoa-new-zealand-dsnz-standards/#requirements-and-guidelines>

⁸ Ministry of Education, Designing Quality Learning Spaces - Acoustics, Version 3.0, December 2020



plant operates during night time hours, compliance with the night time noise limits would need to be achieved, and demonstrated as part of the OPW. With respect to traffic noise, we understand that the Proposed Selwyn District Plan exempts traffic noise generated within a land transport corridor. However, the noise from on-site traffic movements (i.e. those taking place within the designation area) would be relevant for assessment, and would need to achieve compliance with the identified noise limits (during day or night time hours as relevant).

Why is the exemption Monday to Saturday, and not Monday to Friday as per standard school days? What 'standard school outdoor recreational activities' are envisaged on Saturdays during the daytime period when the proposed limits do not apply?

For the exemption "standard school outdoor recreational activities" what does this include, or not include? We assume that amplified music, impulsive noise sources (such as starter guns etc) could otherwise occur with no restriction during the daytime period? In particular, the words "standard" and "recreational" seem potentially confusing. This would also imply that cultural activities, or other outdoor learning activities (that might not be deemed "recreational") would otherwise need to comply with the noise limits— was that the intent of the wording?

We refer to our earlier response clarifying the rationale for the exemption and flexibility for activities to occur on a Saturday, with this reflecting the common and regular utilisation of school playing fields for school sport / recreation on Saturdays. We note this Saturday exemption is reflected in the Ministry's standard noise condition contained within the Auckland Unitary Plan, and also within a number of educational purpose designations in the Selwyn District Plan.

We note the term 'standard school outdoor recreational activities' reflects the terminology used in the more recent educational purpose designations in the Selwyn District Plan⁹, and we are unaware of any concerns or issues in relation to the interpretation of this term. The term is intended to simply capture the standard range of school and outdoor recreational activities provided for as part of the 'educational purpose' definition contained within the NOR. By way of context and example, the exemption caters for academic, sporting, social or cultural education events, including fairs or other gatherings, with these all considered to fall within the realm of standard school outdoor recreational activities.

In general, the proposed noise limits (notwithstanding the proposed standard school outdoor recreational activity exemption) aligns with the hours and limits recommended for all GRUZ zones receiving noise from the site for continuous and fluctuating noise. However, does not provide an Lmax noise limit for the night-time period. Was this intentional? We note that the designation allows for community education (including night classes) along with formal and informal activities (recreational, sporting, cultural activities and competitions), fairs functions and other gatherings which can occur outside school hours. With residential properties adjoining the site boundary, we consider the inclusion of an Lmax noise limit to appropriate, and in line with

⁹ MEDU-18 West Rolleston School, MEDU-20 Ararira Springs Primary - Te Puna o Ararira, MEDU-30 Acland Park School



the Selwyn PDP and other limits outlined as part of school designations under the Auckland Unitary Plan, in order to ensure protect residential amenity, in particular sleep disturbance.

The noise condition advanced in the NOR reflects that of the most recent educational purpose designation confirmed in the Selwyn District, that associated with MEDU-30 Acland Park School. This particular designation does not feature an Lmax noise limit, however it is acknowledged that other educational purpose designations within the Proposed Selwyn District Plan do, as does the Ministry 'standard' noise condition contained within the Auckland Unitary Plan. This distinction was not intentional, and subsequently, a change to the operational noise condition advanced by the NOR is proposed to reflect a Lmax noise limit of 75dB.

What happens if a dwelling was built in the future on rural properties closer than current notional boundary locations? The construction of the overall site is expected to occur over a number of years, as could new residential dwellings on rural land (located to the south). Perhaps the limits should apply at the site boundary, in all directions?

As noted, the noise condition advanced within the NOR has adopted the same approach as that of MEDU-30 Acland Park School. This designation was advanced in a comparable situation where the site and adjacent land was zoned rural, however urban development was authorised by way of resource consents that reflected a residential zone framework. To this end, the noise condition provides a control both with respect to the notional boundary within a rural zone, or at the site boundary of any site zoned primarily for a residential purpose. This approach is considered to appropriately reflect that of the Proposed Selwyn District Plan, and the rural and residential interfaces of the site.

We note that in the instance a dwelling was built on rural properties closer than the current notional boundary, the noise assessment location would change. However, if the site and education facility was already lawfully established, it would be subject to existing use rights. In any event, we consider this outcome to be unlikely, noting that both properties directly to the south are 4ha in area (corresponding with the minimum rural density standard), feature relatively modern residential homes, and are separated from the site by Selwyn Road, an Arterial Road under the District Plan.

What about if hard courts are located near residential receivers? It is our experience that noise from courts (from PE/health classes, sports coaching – which we expect would come under the “standard outdoor recreational activities” definition) can be intrusive for neighbours (including ball games, whistles, yelling/screaming). Hard courts with a canopy over can increase these issues, and have a high level of use. Currently this activity would not be required to comply during the daytime period school hours Monday to Saturday, and this may therefore not be a design consideration even when there are practicable options to reduce noise effects.

There is currently no detailed information available around the master planning and future site development such as the location of sport fields and hard court areas. These matters will be determined as part of master planning and a future OPW, however it is noted that the Ministry's design process does consider opportunities to avoid or mitigate any potential



effects on nearby sensitive receivers, notwithstanding the standard noise exemption for school and outdoor recreational activities.

It is noted that the site was selected following a comprehensive site evaluation process, with discussions occurring with the developer at an early stage. This early engagement afforded an opportunity to achieve multiple road frontages, assisting in minimising the proximity to nearby sensitive receivers. Further, and as outlined in the NOR, the presence of a school within the West Village development was well advertised, with the developer including a specific clause within the sale and purchase agreements for West Village to inform purchasers of the school development on the site.

4 OTHER MATTERS

We note that the RFI received via email on the 18 June identified that Gabi Wolfer, Senior Urban Designer at SDC has reviewed the NOR, with her comments discussed and clarified at our meeting 21 June 2022.

In brief, we note that the master planning and detailed design of the future education facility remains ongoing, with these matters to be the subject of a future OPW, with SDC provided an opportunity to review and if necessary, request changes to the same. In this regard, the Ministry design team has recently engaged with SDC to obtain initial feedback that will inform master planning. Further to this, the NOR includes a designation condition which requires the submission of an urban design statement as part of any OPW, with this statement required to demonstrate how the layout and design of the education facility promotes a positive relationship to the adjoining street network and neighbourhood. To this end, as far as urban design matters are relevant at this NOR stage, it is considered that the site attributes and the conditions advanced in the NOR provide an appropriate response to relevant urban design matters for future school development.

We trust this additional information will afford you further clarity with respect to the NOR. Please do not hesitate to contact me should you have any queries. You can contact me direct on 027 465 8099 or via email at daniel@townplanning.co.nz.

Nāku iti noa, nā | Yours sincerely,
Town Planning Group



Daniel Thorne
Director

Encl: Attachment A – Abley, Rolleston College RFI Response Memo, dated 7 September 2022