

Report

Rudolf Steiner Plan Change Report

Prepared for Waldorf Schools (BOP) Trust (Client)

By Beca Carter Hollings & Ferner Ltd (Beca)

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Revision History

Revision N°	Prepared By	Description	Date
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Document Acceptance

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1 Introduction

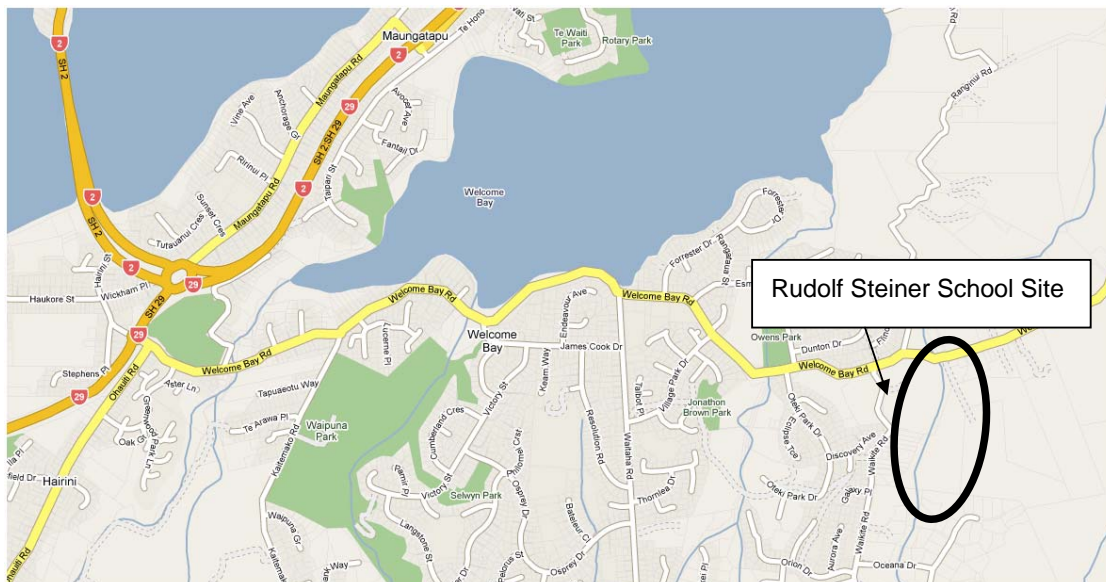
Rudolf Steiner School in Tauranga is growing and needs to provide more facilities and infrastructure to accommodate this growth. The school is proposing to rezone the site the school currently occupies from Rural Residential to Education Centre 3 Zone through the District Plan Review. The school does not fall under the control of the Ministry of Education and therefore can not designate land. An outline Concept Plan for the schools development is attached in Appendix A.

This report provides a summary of the proposal, an assessment of the environmental effects that may be created through rezoning the land, a section 32, RMA evaluation of the costs, benefits efficiencies, effectiveness and appropriateness of the proposed new rules for the zone. Consultation is not required as part of the s. 32 analysis, however, consultation has been undertaken with those parties who are considered affected by the proposed Plan Change to assist in understanding the needs of resource users. A summary of the consultation undertaken is included in Appendix B.

2 Proposal

Rudolf Steiner School currently occupies a site located at R/ 364 Welcome Bay Road, on the eastern outskirts of the residential suburb of Welcome Bay, Tauranga. See Figure One below.

Figure 1: Location of Rudolf Steiner School Site



The school has occupied the site for a number of years and currently there are 222 pupils with 13 full time staff and 11 part time staff. There are 70 early childhood children and 152 primary students.

The site is currently divided into both Greenbelt and Rural Residential Zones under the District Plan (see figure 2 below) . The Greenbelt Zone occupies the western half of the site, which includes a gully and watercourse, whilst the eastern part of the site is zoned Rural Residential and includes the existing school buildings, car parking and playing fields.

Figure 2: Current Zone for Rudolf Steiner School



The school is looking to expand in the future and grow its roll to 600 students and 50 staff. It wants to future proof the site for education type facilities by rezoning the eastern part of the site from Rural Residential to Education Centre 3 Zone

A Site Development Concept Plan has been developed which gives an indication of the future layout of the school (Appendix A).

The following reports and assessments have been undertaken to assess the likely environmental effects the plan change may have on the environment: landscape and visual assessment, traffic impact assessment, a preliminary geotechnical appraisal, and a wastewater and stormwater assessment.

3 Assessment of Environmental Effects

3.1 Traffic Effects

A comprehensive Traffic Impact Assessment has been prepared for the site and was submitted to Council on 5th February 2009 which addresses the effects created by increased traffic. The Assessment covers the following aspects:

- Parking on site
- Widening of road at entry
- Widening right-of-way
- Public transport/ school transport provision
- Walking and cycling

- Bus pick up and drop off
- School travel plan (car sharing etc.)
- Possible excavation of roadside bank on Te Puke side of driveway to improve sight distances.

*The TIA demonstrates that the proposed plan change for the Rudolf Steiner School site would have **a less than minor** impact on the highway environment. The mitigation measures proposed for the site would improve the site access, provide safe pedestrian access, improve general highway safety and develop a commitment to more sustainable travel modes for the school. The scheme design of the car park layout has demonstrated that at this stage, the school is able to provide more than sufficient spaces.*

Mitigation measures include:

- *Redesigned site access*
- *Pedestrian provision*
- *Travel Plan, to incorporate public transport/ school bus, car share, walking and cycling*
- *Crossing Patrol at new pedestrian refuge.*

With these in place it is considered that the school can expand as part of its plan change application without any adverse effects on highway capacity or safety.

3.2 Landscape and Visual Effects

A landscape and visual assessment for the site was undertaken by Isthmus, their full report was submitted to Council in November 2008. Isthmus's report identifies that the main effects created will be on the surrounding rural character of the area with specific effects on neighbouring properties and public roads. The following mitigation has been proposed to minimise these effects:

- *All development should nestle into the natural landform. Where possible access roads should follow the natural contour.*
- *A 3m wide landscape buffer should be established along the eastern boundary of the site and where possible integrated with the car parking and vehicle areas anticipated within the adjacent Sub Zone B. The landscape buffer would include trees and shrub planting found within the local rural environment.*
- *Any significant earthworks resulting in batter slopes and/ or retaining walls should be rehabilitated and softened with landscape planting.*
- *All boundary fencing should be rural and open in character, such as a post and rail or post and wire fence. Closed timber fences should be avoided, or concealed with planting.*
- *Large bulky buildings should be modulated, so they appear as a cluster of smaller building components, which are less prominent.*
- *Large car parks should also be modulated and broken down into a series of interconnected smaller car parks. This can be achieved with landscape planting.*
- *The architecture of the buildings should be rural in character. For example, round roofs could be used, which reflect the half round hay barns typically found in the rural landscape.*
- *The buildings should be constructed from materials typically found in the rural environment, such as weathered timber board and batton and corrugated steel.*
- *A comprehensive school development scheme should be achieved through the use of a consistent architectural style, building materials and colour scheme of the school buildings, so they appear unified and coherent.*

- *The colours of all buildings including external components (such as guttering, spouting, and window joinery) should be of natural tones within the British Standard (BS) 5252 range, groups A and B, with a maximum reflectivity of 40%. Colours that are reflective should be avoided.*

3.3 Geotechnical

A preliminary desktop geotechnical appraisal was undertaken by Beca, the full appraisal was submitted to Council in November 2008. Below is a summary of the findings of the appraisal.

- Both the sports field area and the elevated paddock areas are considered potentially suitable for the future development.
- The gently sloped elevated paddock area at the southern end of the site is favoured as it is expected to be underlain by in situ ash soils and has a lower risk of unsuitable ground conditions. No significant geotechnical issues that may restrict development were identified within this area, though confirmation of the ground conditions is required. Additional design and construction costs will be incurred for the development where widespread earthworks are undertaken to form platforms for buildings. Weak subsoils, where encountered, may require carefully detailed foundations and retaining measures.
- Greater uncertainty exists for the sport field area due to the past infilling of the gully to form this level area and a reliance on a buried culvert to carry stormwater and seepage flows across the area. Further onsite geotechnical investigations are needed to confirm the extent and competency of the fill and to assess the suitability of the area for the development proposed.
- At this early stage, development in either area is recommended to be set back from any slope steeper than 3hor: 1ver by at least 10 m, subject to confirmation of slope stability.
- Control of surface water runoff and avoiding soakage disposal is recommended to be adopted site-wide to reduce the risk of instability of natural and fill slopes.

Recommendations

The scope of future geotechnical assessments depends on what area is favoured for development, whether steeper areas of the site are avoided, and if the nature of the development does not subsequently include heavy or settlement sensitive structures, as is currently envisaged.

A series of logged test pits with in situ strength testing are initially recommended to be undertaken in the gently sloped areas of the elevated paddock area to confirm subsurface conditions.

Deeper investigations are recommended if the sports field area is favoured, to confirm the depth and strength of the fill and the underlying soils, plus a review of the information regarding past earthworks in this area.

3.4 Wastewater and Storm Water

A drainage report for the site was produced by Beca which deals with stormwater and waste water mitigation, this report has been submitted previously to Council and below are the key findings of this report.

- Stormwater drainage from the site can be relatively easily dealt with by discharging it to the existing gully to the west of the site. Stormwater can also be attenuated in this location by making amendments to the dam of the largest pond on the site, subject to the approval of Environment Bay of Plenty.
- Wastewater would best be dealt with by connection to the main sewer. Although this is likely to prove more expensive than a soakage field in the short-term, in the long-term it is likely to be significantly cheaper.

4 Statutory Considerations

4.1 Section 32 RMA

In achieving the purpose of the Act, an evaluation must be carried out under Section 32 before notifying a Plan Change and report, which is publically available from the date of notification. This report addresses the relevant matters set out in Section 32.

The relevant parts of Section 32 of the RMA state:

32. Consideration of alternatives, benefits, and costs

(1) In achieving the purpose of the act, before a proposed plan ... is publically notified under section 48..., an evaluation must be carried out by –

(d) person who made the request, for the plan changes that have been requested and the request accepted under clauses 25(2)(b) of Part 2 of Schedule 1.

(2) A further evaluation must also be made by –

(a) a local authority before making a decision under clause 10 or clause 29(4) of Schedule 1; and

(3) An evaluation must examine—

(a) the extent to which each objective is the most appropriate way to achieve the purpose of this Act; and

(b) whether, having regard to their efficiency and effectiveness, the policies, rules, or other methods are the most appropriate for achieving the objectives.

(4) For the purposes of [[the examinations referred to in subsections (3) and (3A)]], an evaluation must take into account—

(a) the benefits and costs of policies, rules, or other methods; and

(b) the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules, or other methods.

(5) The person required to carry out an evaluation under subsection (1) must prepare a report summarising the evaluation and giving reasons for that evaluation.

(6) The report must be available for public inspection at the same time as the document to which the report relates is publically notified or the regulation is made.]”

The purpose of the Act is stated in section 5(1) is:

“To promote the sustainable management of natural and physical resources”

Comment

The Plan change is necessary to achieve the purpose of the Act as it will:

Enable people and communities to provide for their well-being, health and safety: The Plan Change will allow for efficient use of the subject land for the benefit of the wider community. The proposed change in zoning reflects what is currently occupying the site.

Sustain the potential of natural and physical resources and safeguarding the life-supporting capacity of air, water, soil and ecosystems: The rezoning of the land to education centre zone will accommodate the growth of the school in a sustainable manner by reducing the pressure for school development of other areas that are more suitable for other activities within the Tauranga District.

Avoid, remedy or mitigate any adverse effects on the environment: The information in Section 3 of this report addresses the potential environmental effects that could result from the rezoning of the land and the means of avoiding, remedying and mitigating these effects. Such measures include buffer planting to protect the visual amenity of the area and enhancements of wastewater and traffic networks.

4.2 Regional Policy Statement and Operative Regional Water and Land Plan

The Resource Management Act requires consideration of a range of statutory documents. For this application they include, the Bay of Plenty Regional Policy Statement (RPS) and Operative Regional Water and Land Plan (RWLP). These documents provide additional policy guidance to Council in undertaking its functions under section 31(a).

4.2.1 Regional Policy Statement

The RPS provides an overview of resource management issues within the Region, overall policy guidance and direction. The District Plan cannot be inconsistent with the RPS. The Policy Statement acknowledges that the use and development of land plays an important role in enabling people and communities in the region to provide for their social, economic and cultural well being and their health and safety.

It is considered rezoning the subject site from Rural Residential to Education Centre 3 Zone is an efficient use of the land resource as the site is currently being used for education purposes. By allowing the rezoning of this piece of land, it future proofs the development of the school providing for the school's social, economic and cultural well being as well as clearly signalling to the public the intended use of this area of land.

Technical assessments undertaken as part of the plan change have concluded that rezoning the land will have a less than minor effect on transportation and utility networks, infrastructure and public works and the amenity of the surrounding environment. Mitigation measures have been proposed as part of the plan change provisions to avoid or mitigate any potential adverse effects on the surrounding environment.

4.2.2 Operative Regional Water and Land Plan, 2008

The RWLP was made operative in December 2008. In Section 3 of the RWLP, Issue 10 states

"Land use and management practices that are inappropriate to the specific characteristics of the site, (including soil type) may cause adverse effects on the environment".

Comment

The proposed plan change is considered to be an appropriate use of the subject land. Mitigation measures have been implemented through rules to ensure that development of the site will not cause any adverse effects on the environment.

4.3 Issue Statements and Anticipated Environmental Results

The District Plan offers a hierarchical approach to Part A of the Plan which is the City's Policy Statement. The issue is identified, accompanied by an issue statement, which sets the stage for

management of the matter. The overall objective for the issue is then established, and a second tier level of policies is stated to offer more specific guidance. From here the Council outlines the District Plan methods and other methods (such as education or use of the annual plan process), which specifically assist in implementing the objective and policies. An explanation and principle reasons are offered before the anticipated results are identified.

Tauranga City Council as part of their District Plan Review are proposing new generic objectives and policies for all Education Centre Zones. After considering the proposed purpose, objectives, and policies for the Education Centre Zones, it is considered that the proposed rezoning of the subject site is consistent with these. Therefore, as part of the District Plan Review no specific objective and policy changes are proposed. The only changes are to the Education Centre Zone (ECZ) Rules, where a new ECZ 3 zone has been created with a sub-zones A and B. The proposed rules are attached as Appendix C.

5 Evaluation

5.1 Plan Change vs. Resource Consent

Options	Explanation
A. Resource Consent Application	The school's long term plan is to grow and provide for a wider range of education facilities. To develop the site in accordance with their plans a number of resource consents would be required, for discretionary activities in the Rural Residential zone.
B. Private Plan Change Application	This option involves applying for a private plan change to provide for the comprehensive strategic development of the Rudolf Steiner School site.

5.1.1 Evaluation of the different processes: Resource Consents vs. Plan Change

Option A – Resource Consent Applications	Social	Economic	Environmental
Summary of benefits	<ul style="list-style-type: none"> ■ Council staff familiar with the resource consent process. 	<ul style="list-style-type: none"> ■ Generally cheaper and less time consuming application process. 	<ul style="list-style-type: none"> ■ Allows a site specific activity, suitable for a contained one off activity. ■ A resource consent application has a specific duration.
Summary of costs	<ul style="list-style-type: none"> ■ Potentially seemingly endless process as school develops overtime to accommodate a growing role. No certainty for the community. 	<ul style="list-style-type: none"> ■ A resource consent for discretionary/ non complying activities in the Rural-Residential zone does not provide certainty for either the school, community or 	<ul style="list-style-type: none"> ■ Attached conditions are more specific and potentially restrictive.

	<p>surrounding landowners.</p> <ul style="list-style-type: none"> ■ Long term costs increased as separate consents required traversing the same type of activities.
Appropriateness	Not appropriate as a means of providing for a comprehensive redevelopment as the underlying zone is rural-residential and does not provide for education facilities of this size and scale. Future development could be declined.
Effectiveness	Not effective as a means of providing certainty for the school and the surrounding area.
Efficiency	Not efficient as individual consents may not consider the cumulative effects on the environment to the same extent as a specific ECZ.

Option B – The District Plan	Social	Economic	Environmental
Summary of benefits	<ul style="list-style-type: none"> ■ The life of a plan change is the same as the district plan and would 'fit' with the District Plan Review. 	<ul style="list-style-type: none"> ■ A plan change provides certainty for landowners and neighbours. 	<ul style="list-style-type: none"> ■ Provides for site specific activities with pre-stated conditions clear to all users of the District Plan. ■ Suitable for a range of matters that are not currently provided for within the District Plan that are appropriate to the established landuse. ■ Suits the proposed comprehensive development of the School as detailed in the Rudolf Steiner Site Development Concept Plan. ■ Sets up a long term management framework.
Summary of costs	<ul style="list-style-type: none"> ■ School investment in infrastructure upgrades, prior to school redeveloping. 	<ul style="list-style-type: none"> ■ The plan change process is costly and time consuming 	<ul style="list-style-type: none"> ■ The effects associated with the Plan Change are different to those created in the existing rural residential zone.
Appropriateness	Appropriate as a means of providing for the rezoning of land to allow for a comprehensive school development building on the existing established		

	land use.
Effectiveness	Effective as a means of providing for the long term comprehensive school development.
Efficiency	Efficient as a means of providing for the development of an existing school. It is more efficient to use land for what it is currently being used for, rather than forcing the school to relocate to a new site.

5.2 Risk of Not Acting

There are two options for the school, retain the status quo and apply for resource consent each time a new building is required or to apply for a plan change which rezones the land and provides the school with certainty as it develops in the future.

It is not the role of the Council to prevent development but to manage the potential adverse effects whilst seeking to achieve positive and defined environmental outcomes. The status quo is not an option as it does not provide certainty for the school or the surrounding residents. The effects created are treated in an ad hoc fashion and there is no strategic direction for the site. The School has undertaken a significant amount of work to ensure any effects created by the plan change have been avoided, mitigated and remedied and there is sufficient information provided to allow the change in zoning to proceed.

5.3 Rules, including Planning Maps and Other Methods

5.3.1 Effectiveness and efficiency of the proposed rules and their alternatives - Overview

Effectiveness

It is important to determine whether the preferred approach will be more effective than other alternatives in achieving the objective, whether this effectiveness comes at a higher cost than other alternatives and whether the costs may potentially outweigh the benefits. In the preparation of the plan change it is considered that the existing policies and the proposed rules are the best means of achieving the existing objective in an effective and efficient manner.

A regulatory approach to the district plan provisions is recommended as there are no better alternatives that enable the effective use and development or give effect to, the established use of the site.

Efficiency

The efficiency of this approach will be monitored over time through the key performance indicators of resource consent applications (where they are required) within the ECZ 3 and consequent suitability for development that is compatible with the zone objective.

It is anticipated that the proposed change will enable Rudolf Steiner School to continue to operate in its current state whilst integrating successfully with the surrounding environment.

5.3.2 The costs and benefits of the proposed rules

Section 32(4) (a) and (b) are set out below. For the Council to be satisfied that the evaluation in Section 32(3) has been completed the Council must:

For the purpose of this examination, an evaluation must take into account –

- (a) *the benefits and costs of policies, rules, or other methods; and*
- (b) *the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules, or other methods.*

Comment

It is considered that the proposed Plan Change achieves an overall net benefit by securing the future of the school on the site in a manner that has a less than minor impact on the surrounding environment. It is considered that the proposed Plan Change achieves the purpose of the RMA and will result in sustainable management in terms of the RMA.

5.4 Evaluation of Rules

Permitted Activity Rules

Development Intensity and Scale

(Insert Rule) 22.17.1 Development Intensity and Scale - Education Centre 3 Zone	
<ul style="list-style-type: none"> (a) <i>Building</i> development shall be limited to <i>educational facilities</i> up to an establishment level of 222 pupils and 35 staff until all <i>buildings</i> requiring <i>wastewater</i> disposal are connected to an authorised sanitary sewerage system. (b) Where <i>building</i> development in the Education Centre 3 Zone is physically connected to a sanitary sewerage system designed and constructed to accommodate sanitary effluent generated from the activities in the zone, the development intensity restrictions of <i>Rules 22.17.1(a)</i> and <i>Rule 22.21 of the Plan</i> shall not apply. 	
Summary of benefits	<ul style="list-style-type: none"> ■ Ensures school adequately addresses provision for waste water ■ Allows School to utilise existing network
Summary of costs	<ul style="list-style-type: none"> ■ Puts more pressure on Council owned waste water reticulation system when connected. ■ Financial cost to the school to provide pump station and connection to system.
Effectiveness	<ul style="list-style-type: none"> ■ Effective, in ensuring no contamination of the land through inappropriate discharge of waste water.
Efficiency	<ul style="list-style-type: none"> ■ Efficient, use of the existing wastewater network which runs near the site.
Appropriateness	<ul style="list-style-type: none"> ■ Appropriate, as a means of protecting the environment from contamination from wastewater and is consistent with objective 7.8.1 of the Plan.

Traffic management, safety and convenience

(Insert Rule)	22.17.3 Traffic Management, Safety and Convenience
(a)	<p>Before the school roll exceeds 450 students, the intersection of the school access with Welcome Bay Road shall be constructed as follows:</p> <ul style="list-style-type: none"> (i) A deceleration taper and left turn lane 2.5 metres in width comprising a 15 metre storage area and 30 metre taper on the eastern side of the school entrance to allow left turning traffic to move clear of through traffic travelling west. (ii) A 2.5 metre flush median to be incorporated into road markings to provide a safe refuge for vehicles right turning and travelling east. (iii) The removal of the roadside bank on the eastern side of the school driveway to enable sight distances to meet acceptable guidelines. (iv) That the actual driveway intersection with Welcome Bay Road to be constructed of alternative materials to clearly indicate the demarcation between public and private roads.
(b)	Every activity shall provide on-site parking, manoeuvring, loading and access in accordance with the provisions of Chapter 4 - Traffic management, safety and convenience conditions specified within clause**
(c)	The provision of Traffic management, safety and convenience conditions specified within clause** (<i>25 car-park requirements</i>) shall not apply to the Education Centre 3 Zone.
(d)	No car parking shall be provided for on or along Welcome Bay Road.
Summary of benefits	<ul style="list-style-type: none"> ■ Ensures traffic safety to and from the subject site ■ Clearly identifies trigger points for works
Summary of costs	<ul style="list-style-type: none"> ■ Financial costs
Effectiveness	<ul style="list-style-type: none"> ■ Effective, as the access has been identified as the most suitable (only) access to the subject site.
Efficiency	<ul style="list-style-type: none"> ■ Efficient, as the existing entrance way is being utilised and enhanced, this is an efficient use of existing infrastructure.
Appropriateness	<ul style="list-style-type: none"> ■ Appropriate, by ensuring the school enhances the entrance way before the school reaches 450 pupils. This provides the school time to redevelop the entranceway whilst still providing for the safety for its students and staff.

Visual Amenity – Landscape

(Insert Rule)	<p>22.17.4 Visual Amenity – Landscape</p> <p>(a) Landscaping shall be provided along the eastern boundary of the site as shown as ‘Landscape Buffer 1’ on Appendix 22C before the school roll exceeds 250 pupils;</p> <p>(b) Landscaping shall be provided along the eastern boundary of the site as shown as ‘Landscape Buffer 2’ and the southern boundary of the site as shown as ‘Landscape Buffer 3’ on Appendix 22C before the school roll exceeds 450 pupils;</p> <p>(c) Where any buildings are constructed in the Education Centre 3 Zone within 120 metres of the southern boundary before the school roll exceeds 450 pupils, ‘Landscape Buffer 2’ and ‘Landscape Buffer 3’ shall be planted;</p> <p>(d) Landscaping for ‘Landscape Buffer 1’ and ‘Landscape Buffer 2’ shall consist of trees and shrub planting maintained to a minimum height of 2 metres, and a width of 3 metres;</p> <p>(e) Landscaping for ‘Landscape Buffer 3’ shall consist of shrub planting maintained to a height of 2 metres and a width of 3 metres. The existing 17 poplars shall be retained or replaced with poplars or trees which provide <u>at maturity</u>, at a minimum the same level of screening afforded by <u>the existing</u> poplars at maturity;</p> <p>(f) For Rules 22.17.4 (a)**, and 22.17.4 (b)**, breaks in the planting requirements of not more than 3 metres in length are permitted along the specified boundaries but must not reduce the planted area of each of the landscape buffers by more than 40 percent.</p> <p>(note <u>underlined text</u> is a further change to existing plan change text)</p>
Summary of benefits	<ul style="list-style-type: none"> ■ Provides mitigation measures to minimise the visual adverse effects on neighbouring residential properties and retains the rural character of the area. ■ Proposed rule supports the existing objectives and policies. ■ Staging of landscaping is consistent with staging of the development of the school.
Summary of costs	<ul style="list-style-type: none"> ■ Financial costs to the school
Effectiveness	<ul style="list-style-type: none"> ■ Effective, as it mitigates the visual effects associated with a school neighbouring a rural-residential zone.
Efficiency	<ul style="list-style-type: none"> ■ Efficient, as it provides a buffer between the school site and neighbouring properties.
Appropriateness	<ul style="list-style-type: none"> ■ Appropriate, as a means of protecting visual amenity in this zone. Rule provides certainty for school and adjoining land owners.

Controlled Activity Rules

<p>(Insert Rule) 22.18.1 Controlled Land-Use Activity Standards and Terms Visual Amenity - Education Centre Zone 3 (Sub-Zone B)</p> <p>(a) <u>Every activity shall meet the permitted activity conditions that apply in Sub- Zone A where these are applicable;</u></p> <p>(b) <u>A <i>site</i> development and landscape plan shall be submitted with each application indicating the design, location and type of proposed <i>buildings</i>, on-<i>site</i> landscaping and tree planting to be provided and maintained within Sub-Zone B;</u></p> <p>(c) <u>Landscaping proposed shall:</u></p> <p>(i) <u>Achieve visual mitigation of the bulk and location of the buildings on the site as viewed from the surrounding Rural-Residential zoned area.</u></p> <p>(ii) <u>Consider the topographic features within the site in plant selection and location of landscaping and <i>tree</i> planting</u></p> <p>(iii) <u>Use <i>tree</i> species of a scale (at maturity) similar to the scale of <i>buildings</i> proposed (a mix of <i>indigenous</i> and exotic species is expected)</u></p>	
Summary of benefits	<ul style="list-style-type: none"> Clearly identifies that the main effect of building in Sub-zone B is on visual amenity and requires the applicant to produce a landscape plan to ensure effect is minimised.
Summary of costs	<ul style="list-style-type: none"> Additional cost of producing the landscape plan
Effectiveness	<ul style="list-style-type: none"> Effective, as it mitigates the visual effects associated with a school neighbouring a rural residential zone.
Efficiency	<ul style="list-style-type: none"> Efficient, as it provides a buffer between the school site and neighbouring properties.
Appropriateness	<ul style="list-style-type: none"> Appropriate, as a means of protecting visual amenity in this zone. Rule provides certainty for school and adjoining land owners.

Discretionary Activity Rules

<p>(Insert Rule) 22.20 Discretionary Activity Rules</p> <p>(a) Any activity which is not listed as a permitted, controlled, restricted discretionary, non-complying or prohibited activity;</p> <p>(b) The establishment of a school roll in excess of 600 pupils.</p> <p><i>(note staff reference removed as changes in education policy dictate staff numbers required for 600 students)</i></p>	
Summary of benefits	<ul style="list-style-type: none"> Provides certainty to Public, Council and School. As all assessments i.e. traffic, waste water, visual have provided mitigation for a school roll of 600 students and 50 staff, the effects of development beyond 600 students are unknown, therefore all new applications above this threshold should have all effects assessed at the Council's discretion.
Summary of costs	<ul style="list-style-type: none"> Financial costs to the school of applying for discretionary activities.

Effectiveness	■ Effective , in ensuring effects are assessed when school exceeds 600 students.
Efficiency	■ Efficient , use of existing approach in the Tauranga District Plan.
Appropriateness	■ Appropriate , as a means of protecting the environment from potential effects created for a school in excess of 600 students.

Non-Complying Rules

(Insert Rule) 22.21 Prohibited Activities	
A prohibited activity is:	
(a) Any land-use activity which will increase the wastewater loading at the Rudolf Steiner School Education Centre 3 Zone beyond 222 pupils and 35 staff where <i>site</i> development is not connected to an authorised sanitary sewerage system, or where such system does not have sufficient capacity to serve the proposed land-use activity.	
<i>(Note 1: reference to sanitary effluent removed and replaced with wastewater, as this is the term used elsewhere in the plan).</i>	
Summary of benefits	■ Provides certainty to the Council, School and users of the Plan.
Summary of costs	<ul style="list-style-type: none"> ■ Requires the school to connect to a wastewater system prior to any further development on site. ■ Puts more pressure on Council owned waste water reticulation system ■ Financial cost to the school to provide pump station and connection to system.
Effectiveness	■ Effective , in ensuring no contamination of the land through inappropriate waste water discharge
Efficiency	■ Efficient , use of the existing wastewater network which runs near the site.
Appropriateness	■ Appropriate , as a means of protecting the environment from contamination from wastewater and is consistent with objective 7.8.1 of the Plan.

Appendix 23C Site Plan

Changes to District Planning Maps - Insert Appendix 22C	
<i>(Note the position of landscape buffer 1 has changed slightly)</i>	
Summary of benefits	■ Provides an update to the zoning of the subject site and a visual aid for where sub zones and landscape buffers are located.
Summary of costs	■ Non known
Effectiveness	■ Clearly defines Education Centre Zone 3
Efficiency	■ Provides an easy tool for users of the District Plan to identify the zonings of the subject site.
Appropriateness	■ Provides a means of implementing the District Plan objectives, policies and rules.

6 Consultation

To be completed following comment on Draft District Plan Review.

7 Conclusions

In summary, to facilitate the development of Rudolf Steiner School a number of assessments have been undertaken that have identified potential effects and suggested mitigation measures to minimise these effects. The mitigation measures have been incorporated as rules in the District Plan to ensure the effects are minimised. Not acting and remaining with the status quo is not a feasible option, a plan change is the most appropriate way forward for the school as it provides more certainty for the School, the Council and the surrounding residents in the area. We request that Council adopt this Plan Change and incorporate it into the Tauranga District Plan as part of the District Plan Review.

Appendix A

Site Development Concept Plan

Appendix B

Summary of Consultation

Appendix C

Proposed Rules