

A. Boulcott School Board of Trustees (the Submitter)

As the Board of Trustees of Boulcott School we have a governance and social contract with the Ministry of Education to ensure we foster student achievement (NAG 1) and to provide a safe physical and emotional environment for students (NAG 5).

Summerset's application outlines plans to construct a multi storey village, up to five stories high on a small pocket of land, right next to our school. The school are not opposed to development of this site where such development is in keeping with the size, scale and character of the school and neighbourhood.

Because of the size and scale of these proposed buildings, the impact of construction on our school community will have a significant impact on the teaching and learning programmes for all our young learners and staff. Noise, dust and vibrations from this construction will all contribute to an extremely unpleasant environment for teaching and learning.

Given that the applicant has applied for consent for a seven-year period, the effects of the Proposed Development could affect Boulcott School for a significant time to come - more than likely affecting a current 5-year-old child's education every year they attend Boulcott School until they leave in Year 6.

For teaching and learning to be effective, our students and teachers require a quiet environment with minimal disruptions, so they can reach their potential. With 16 classrooms operating, we have a block of 5 classrooms that are close to the boundary of this proposed development. The closest classroom of 25 children, is only 5 metres away from the boundary, close to a proposed 2 storey build.

Learning and teaching next to a large-scale construction site for potentially 7 years will no doubt have a detrimental effect on student achievement, their well-being and mental health. As we are a state school we also have a number of students with particularly high learning needs. Many of these students can struggle to stay focused at the best of times. Learning next to a construction site for 6 years of their primary school education will not make learning any easier for them. We also have students with high behavioural, health and well-being needs who will also be negatively impacted.

Local families will simply not want to send their children to a learning environment where they are exposed to noise and pollution on a regular basis. Several existing families have already expressed their concerns with this proposed development, stating they are prepared to move their child from their school that they love and have a strong connection with. Any reduction in school roll means a reduction in funding from the Ministry of Education. This is equally so for teacher entitlement, which will result in the Board having to reduce teaching roles, losing quality teachers for our tamariki. Therefore, Less Students = Less Money and Less Quality Teachers.

Boulcott School prides itself on the quality teaching programmes we deliver for our children. This is mainly due to the large number of quality teachers and support staff we have at Boulcott. These individuals have a strong commitment to their profession and a genuine passion for working with children. As a Board we strive to provide our staff with a safe, healthy and modern environment so they can do their job effectively. All of our staff choose to work at Boulcott for these reasons. Why would they choose to stay if they are subjected to endless construction noise, dust and vibrations which will hinder their practice and potentially impact on their own well-being?

At our school of 360 students and over 30 teaching and support staff, we take great pride in our school environment. Our only school field is well-utilised at break times for a myriad of activities; from rugby and soccer to fort building and mud-pie making (which often occurs along the boundary line).

We also utilise our outdoor spaces as much as we can during learning time, where we encourage our students to take their learning outside and connect with their surroundings. With 7 years of construction on the other side of our boundary we have grave concerns that these opportunities will be significantly limited.

B. Submission

We oppose paragraphs 1(a), (b) and (d) of the application for the reasons set out below.

C. Decision sought from the consent authority

We seek that the consent authority either decline the application, or grant the application subject to the following conditions:

1. The height of the buildings immediately on the boundary of the site to be built as proposed (i.e. 1-2 stories and less than 8 metres), while other buildings need to be in keeping with the surrounding residential area of predominately 1-2 two stories and limited to 10 metres (consistent with proposed **District Plan Change 43**).
2. The construction will have noise, vibration and dust effects on Boulcott School.
 - a. The size, bulk and scale of the development has a direct link to the length and intensity of construction this can be mitigated as in C1 above.
 - b. The dBA limits during construction be lower than documented in NZS 6803:1999 to minimise impacts on teaching and learning during school hours.
 - c. Stringent dust, noise and vibration controls be imposed during earthworks and construction, so that the day-to-day activities of Boulcott School are not impacted, and the children can continue to play and learn outside. If such controls are breached, there also needs to be a clear mechanism to shut down the site immediately until the breach is remedied.
 - d. As part of this, there should be a requirement for automatic dust, noise and vibration monitoring equipment operating continuously. To be sited on the Northern boundary of Boulcott School either at the boundary midpoint or on the boundary at a point closer to Boulcott Kindergarten. This equipment should be in place prior to commencement of any construction (including earthworks) and remain in place for the duration of construction. The equipment should be able to be checked and recorded remotely by our staff and Hutt City Council in order to be able to enforce breaches of any consents granted, and so as to have an official record of any such breaches. Such equipment to be provided and maintained in good working order at all times by the applicant, at the applicant's cost.
 - e. Any particularly noisy or disruptive earthworks or construction be limited to Boulcott School holidays.
 - f. Requirement for the applicant to further address mitigation solutions around school infrastructure e.g. sound proofing classrooms.
3. Traffic lights be installed at the intersection of Boulcott Street and High Street as suggested in the application (at the applicant's cost, given it is receiving the benefit of the Proposed Development).
4. No employee, construction, contractor or service vehicle traffic be permitted to use Boulcott Street during the hours of **7.30am to 9.15am**, and **2.30pm to 3.30pm**, Monday to Friday, and residents and visitors to be encouraged by the applicant to avoid travelling along Boulcott Street during those times.

D. Reasons for opposition to the application

1. Urban design effects

The height and scale of the Proposed Development is incompatible with the surrounding residential development as required by Objective 4A 1.2.1(c) of the District Plan. Specifically, from the perspective of Boulcott School, the four and five storey buildings proposed are well in excess of the height and scale of our residential neighbours, which comprise one and two storey detached houses.

The height and scale of the Proposed Development also does not accord with any of sub-paragraphs (i) to (iii) of Policy 4A 1.2.1(l) of the District Plan, specifically:

- (a) in regard to sub-paragraph (i), this point is the same as made in paragraph D1 above, namely that the Proposed Development is not compatible with the scale, location and form of development on existing Residential Activity Area properties;
- (b) in regard to sub-paragraph (ii), the development on the school site is primarily one storey, with the School Hall being the only larger building, and includes a large playing field along with separate tennis courts ie a large amount of open space. As such, the Proposed Development is very much not of a scale and form that responds to the existing scale and intensity of development on the school site, significantly dwarfing any buildings on the school site; and
- (c) in regard to sub-paragraph (iii), given sub-paragraphs (i) and (ii) have not been met, then sub-paragraph (iii) does not apply. However, for the sake of argument, if sub-paragraph (iii) does apply, then it is hard to see how the four and five storey blocks contribute to a positive relationship to the Proposed Development's neighbours. Rather the significant discrepancy in scale, and the loss of visual amenity, is a significant negative relationship which is likely to impact on the demand for places at Boulcott School.
- (d) regarding the Urban Design document's reference to the "substantial" distances that Blocks D and C will be away from the school, (26m and 37m respectively), in comparison to the school field approximate length of 80m, this is certainly not "substantial" and will be clearly visible from the school.

As set out above, we consider that Policy 4A 1.2.1(l) does not apply, and therefore, this requirement of Policy 4A 1.2.1(m) is not met and the application should be declined. This is further reinforced by the fact that the height and scale of the Proposed Development does not accord with any of sub-paragraphs (i) to (iii) of Policy 4A 1.2.1(m) for the reasons detailed below.

In this regard, sub-paragraphs (i) and (ii) are already covered by the points we make above, though we also make the point that a 10 metre high building as we suggest in paragraph C1 above will achieve the "*opportunity to take advantage of views across the Lower Hutt Golf Course from the edge of the new stopbank...*" as noted in Policy 4A 1.2.1(m).

In terms of sub-paragraph (iii) of Policy 4A 1.2.1(m), the indicative drawings provided by the applicant make it difficult to determine whether there is any visual permeability across the site (let alone whether it is appropriate), particularly from the perspective of Boulcott School. As such the comments made in the applicant's Urban Design Assessment are particularly relevant, which indicate that there will not be any appropriate visual permeability, including on page 21:

"from the fields the retirement village will be obvious and plainly visible..."

"The main change relative to the school is its historical views of the western hills, which are proposed to be substantially removed...".

on page 22 in relation to blocks A, D and F:

"they will not be highly conspicuous or visually dominant other than from the Boulcott School fields"

and from page 25:

"...the majority of existing hill views will be lost relative to the school."

This lack of visual permeability, combined with the height and bulk of the four and five storey buildings of the Proposed Development, is likely to make Boulcott School a less attractive place for our staff and children, resulting in reduced demand for places at the school.

2. Size, scale and density

In relation to comparative sizes of recent Somerset developments, the below table highlight the significant differences in size, scale and density of Boulcott to other developments.

Comparison of the Size, Scale and Density of Somerset's Developments

Location	Development Name	Size of Development*	Number of Units	Density of Units Per Hectare	Status
STATUS – APPROVED					
Casebrook, Christchurch	Somerset on Cavendish	11.8 hectares	240 units	20.34 units per hectare	Development Underway
Avonhead, Christchurch	Somerset Avonhead	9.5 hectares	240 units	25.26 units per hectare	To be constructed
Napier	Somerset Te Awa	9 hectares	320 units	35.5 units per hectare	To be constructed
Wigram, Christchurch	Somerset at Wigram	5.5 hectares	200 units	36.36 units per hectare	Recently completed
Rototuna, Hamilton	Somerset Rototuna	6.4 hectares	264 units	41.25 units per hectare	Under construction
STATUS – APPLIED FOR RESOURCE CONSENT					
32A Hathaway Avenue, Boulcott	Somerset Retirement Villages	3.3 hectares	247 units	74 units per hectare	Applied for Resource Consent
STATUS – RESOURCE CONSENT REFUSED					
St Johns, Auckland	Somerset St Johns	2.55 hectares	344 units	95.67 units per hectare	Resource Consents REFUSED

Boulcott School is supportive of a development on the site if it is keeping with the size, scale and character of the neighbourhood and all adverse effects are avoided, remedied or mitigated. The above detail suggests Somerset appear to be trying to place a similar number of units on the site as they are in similar developments that are 2-3 times the land size. This scale and density are at the heart of our submission.

3. **Construction effects**

During construction of the Proposed Development, we are concerned that dust, noise and vibration will affect the health of the students and staff at Boulcott School, and their ability to use and enjoy our outdoor areas in the manner they currently do.

Not enough consideration has been given to potential construction noise and vibration effects as required in DP 4A 2.3.1 n (iii). Our concern is with the noise and vibration effects and the impacts on student learning, student wellbeing and teacher and staff effectiveness and wellbeing during the construction phase.

- a) We acknowledge that some disruption from a noise and vibration perspective is inevitable being adjacent to a construction site. However, exposure to the environment will be a constant with an uninterrupted period of at least 8 hours every day (in most circumstances) for an overall period of up to 7 years.
- b) The lengthy construction period will impact many students for their entire time whilst a student at Boulcott School. Approximately 720 students could be affected from construction noise during their time at the school.
- c) It was outlined in the 'PC35 Hearing Expert Conferencing Statements: Acoustics Expert Agreement' that:
 - i. The nature and scale of potential construction noise and vibration effects need to be addressed at the time of considering Resource Consent taking into account the size & intensity of the proposal.
 - ii. NZS 6803:1999 should apply as a guideline during the assessment stage of any consent applied for, and as a control on noise during construction, possibly referred to within any conditions attached to a consent (if granted).
- d) District Plan 4A 2.3.1 n (iii) states that: "*Consideration shall be given to potential construction noise, traffic, access routes, dust, sediment runoff and vibration effects on the immediate residential area, including Boulcott School and Kindergarten... including consistency with NZS 6803:1999...*".
- e) The NZS 6803:1999 outlines that during school hours, these standards range between:
 - i. Long Term Duration $L_{eq} = 70$ dBA (vacuum cleaner)
 - ii. Short Term Duration $L_{max} = 95$ dBA (power mower)
- f) Upper 70's dBA is considered annoyingly loud to some people and 80 dBA can cause possible damage in an 8-hour exposure.
- g) Classroom 15 at Boulcott School is less than 5m from the boundary fence where these guidelines are to be measured from.
- h) Australian Standard AS2107: 1987 recommends a satisfactory daytime indoor level of 40 dBA L_{eq} for classrooms with 45 dBA L_{eq} as a maximum noise level. This level has been accepted as appropriate in the New Zealand Environment Court: Decision No. C C35 /2004.
- i) There is a concerning difference between the level that is required for an appropriate learning environment and the level that can be expected during construction.
- j) There has been no approach or community liaison from the Applicant on the possible detailed content of a potential Construction Noise and Vibration Management Plan (CNVMP). We acknowledge that the applicant has proposed to construct a boundary fence, however this is only to mitigate operational noise levels not construction noise levels.
- k) We have no objection to the operational noise and vibration effects following the full completion of all construction works.

The impact of these construction effects may result in significant degradation of appropriate learning environments leading to possible:

- a) Negative impacts to teacher and staff health, wellbeing and existing teacher practice resulting in:
 - i. Losing quality teaching staff
 - ii. Inability to recruit quality teaching staff
- b) Negative impacts to student health and wellbeing resulting in:
 - i. Significant reduction in outdoor teaching and learning opportunities
 - ii. Decrease in student achievement against curriculum standards
 - iii. Loss of students to other schools
 - iv. School not attracting new entrant students
- c) Reduced Ministry of Education funding due to reduced roll

- d) Increased resources required to deal with students with existing high learning, behavioural, health and well-being needs exasperated by the construction effects, and new learning needs caused by the construction noises.

4. Traffic Effects

In operation, we are concerned that the Proposed Development comply with District Plan Rule 4A 2.3.1(n)(i), in ensuring the safe and efficient movement of vehicle and pedestrian traffic, and that normal traffic flows not be adversely affected. Currently, Boulcott Street, which is the only access to Boulcott School, is very busy during school drop-off times (7.30am-9.15am) and pick up times (2.30pm to 3.30pm). Given the unpredictable nature of the young children in our care, and the busy nature of the road at the peak times mentioned above, we have suggested that traffic restriction condition in our paragraph C4 above to ensure their safety, and to ensure that families are not deterred from attending our primary school due to traffic issues.

On a related note, we challenge the applicants use of traffic information in relation to Boulcott Street gathered during times outside of the peak periods of traffic on this street ie the information should be gathered to cover the school and kindergarten drop-off and pick-up times outlined above, rather than the "site peak" of 10am to midday, and the "PM peak" of 4pm to 6pm referenced by the applicant. Given that District Plan Rule 4A 2.3.1(n)(i) requires an assessment as to whether "normal traffic flows" will be adversely affected, we consider that this information is necessary to form part of the assessment of the traffic impact of the Proposed Development and whether District Plan Rule 4A 2.3.1(n)(i) has been complied with.

Additional negative impacts from the increased traffic which were recognised in Boulcott Schools submission to the Plan Change 35 (PC35) include,

- a. Traffic problems relating to congestion and difficulties in turning vehicles has resulted in two child injury accidents, and several "vehicle to vehicle" accidents in recent years
- b. The Hutt City Council has recognised issues associated with Boulcott Street. Council officers have attended the school periodically to assist with elevated traffic problems. The Hutt City Council and Police Education Officer have also instigated several programmes in association with the school to try and reduce congestion. Turning Bay Investigation (2014), Boulcott School Travel Plan (2015), walking school bus (2015), encouraging parents to drop children at a distance from the school gates (2014-16), and safe scootering to school (2016).
All these initiatives are at risk and in jeopardy with increased traffic during the construction stage, and once the development is completed.
- c. Whilst the primary focus on traffic analysis is on Boulcott Street, increased traffic volumes will also have negative impacts on the feeder streets to the school, ie Ariki, Fry, Troon and Military. All are effectively "one way" streets with parking on both sides of the road, so they will become more frustrating and dangerous with more cars using them (a flow on impact of any new traffic lights on the corner of Boulcott and High St).

5. Amenity Value

A major concern relates to District Plan Rule 4A 2.3.1(n)(iv), specifically sub-paragraphs (a)(i) and (b). While sub-paragraph (b) is dealt with above in our discussions on Policies 4A 1.2.1(l) and (m), we are also seriously concerned about the adverse effect that the Proposed Development would have on the amenity values of Boulcott School in terms of District Plan Rule 4A 2.3.1(n)(iv)(a)(i) as a result of the location, design, appearance, bulk, spacing and articulation of the proposed buildings. In this regard, Boulcott School stands to lose a very attractive outlook across the school's fields and out to the western hills. As mentioned in paragraph D1 above, the applicant's Urban Design Assessment also notes this point. In addition, the "openness" currently enjoyed by the school would be significantly reduced by the

Proposed Development. The result of this loss means that our school will have less amenity for our staff and children, which may in turn cause a loss in demand for places at Boulcott School.

6. Effects on the Community

Historically there has been a gap in the provision of Hutt City Council (HCC) owned children's playgrounds in the Boulcott area. The next closest playgrounds are Avalon Park (2km), and Eastern Hutt School (1.5km).

In 2013 the HCC acknowledged that Boulcott School grounds are the default open green space and children's play area for the Boulcott community.

As a result, the HCC and Boulcott school agreed a "co-share" playground was one solution to resolve the lack of play areas in the immediate Boulcott area. This partnership has been a success, with significant investment from both parties towards the playground in recent years.

A condition of this agreement would be that the playground could be used by the public during evenings, weekends and school holidays, ie it is made available as a public resource. The playground is extensively used by the community outside school hours.

This partnership supports the fact the Boulcott School only has one field, and the students are very limited to play anywhere else outside during school breaks reinforcing the negative impact of substantial ongoing earthworks on the school field boundary This also negates the Summerset suggestion that the school is not actively utilised during all weekends and school holidays.

Images of Boulcott School and the Proposed Development's Boundary Fence



Image Above: Boulcott School and Summerset Village's proposed retirement village at 32A Hathaway Avenue



Image Above: Boulcott School's Room 15 - one of five classrooms located along the shared boundary fence.



Image Above: Current view of the Western Hills from Boulcott School's boundary line.



Image Above: Boulcott School students playing beside the boundary fence.



Image Above: Boulcott School students building forts next to the boundary line.



Image Above: Boulcott students playing by the swings located by the shared boundary fence.



Image Above: Students playing football on Boulcott School's only grassed field.