

**BEFORE THE ENVIRONMENT COURT
AUCKLAND REGISTRY**

ENV-2021-

**I TE KŌTI TAIAO O AOTEAROA
TĀMAKI MAKĀURAU ROHE**

IN THE MATTER of the Resource Management Act 1991 (the Act)

AND

IN THE MATTER of direct referral of an application under s 127 of the Act
to cancel a condition of Resource Consent LUC80045488

BETWEEN **KRISTIN SCHOOL CHARITABLE TRUST**

Applicant

AND **AUCKLAND COUNCIL**

Consent Authority

**NOTICE OF MOTION UNDER s 87G OF THE ACT FOR CHANGE OR
CANCELLATION OF CONDITION OF RESOURCE CONSENT**

Dated 19 February 2021

TOMPKINS | WAKE

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To: The Registrar
Environment Court
Auckland

1. Kristin School Charitable Trust (**Applicant**) applies pursuant to s 127 of the Resource Management Act 1991 (**Act**) to cancel Condition 17 of the resource consent granted by Auckland Council (**Council**) on 1 February 2005 (Council Reference LUC80045488) and pursuant to s 87G for its application to be decided by the Environment Court (**Application**). The Application seeks to cancel Condition 17 so as to enable the use of the Bass Road access serving the school by the Applicant's staff, parents, school buses, students and visitors, subject to time restrictions proposed as further conditions to replace Condition 17.
2. The grounds for the Application are:
 - (a) Since the 2005 consent was granted there have been a number of changes such that the restrictions in Condition 17 should no longer apply. In particular:
 - (i) The Kristin School (**School**) roll has increased with resulting increases in congestion and safety concerns arising from the principal access to and egress from the School being via Albany Highway.
 - (ii) The intersection of Bass Road and Albany Highway has been upgraded and traffic lights installed.
 - (iii) The zoning of the School site¹ has changed (from residential to Special Purpose – School) and on 2 December 2019 the Council issued a Certificate of Compliance under s 139 of the Act stating (inter alia) that school vehicles (including staff, parent, student, visitor and

¹ 360 Albany Highway, Albany on Auckland's North Shore.

bus vehicles) may enter and exit the School via Bass Road without limitation or restriction.

(iv) Notwithstanding that the Certificate of Compliance is a deemed resource consent and supersedes the 2005 consent the Applicant has, for the avoidance of doubt, applied to cancel Condition 17 of that consent.

(b) The Council made a decision on 17 November 2020 granting the Applicant's request for the Application to be determined by the Environment Court instead of by the Council under s 87E of the Act.

(c) The Applicant has considered the report prepared by the Council under s 87F of the Act dated 2 February 2021 and wishes to have the Application heard by the Environment Court.

(d) There is a high level of public interest in the Application. 759 submissions were received, of which 419 were in support and 340 in opposition. The number of submissions received indicates that the Application is likely to be contentious.

(e) It will be more efficient in terms of cost and time for all parties and interested persons to have the resource consent application heard and determined by the Environment Court.

(f) The further grounds contained in the affidavit of Mark Wilson dated 19 February 2021.

3. The following documents are **attached**:

(a) An affidavit of Mark Wilson in support of this application (**Attachment A**); and

- (b) A list of names and addresses of persons to be served with a copy of this notice (**Attachment B**).

Dated at Auckland this 19th day of February 2021.



MN Batistich

Counsel for Kristin School Charitable Trust

Address for service of Applicant:

Kristin School Charitable Trust
c/-Tompkins Wake
PO Box 2543
Auckland 1140

Attention: MN Batistich / KM Dibley

Telephone: 021 190 2818 / 027 727 4457

Facsimile: 07 839 4913

Email: marija.batistich@tompkinswake.co.nz

kirsty.dibley@tompkinswake.co.nz

Advice to recipients of copy of notice of motion

How to become a party to proceedings

1. You may be heard on this application if you come within section 274(1) of the Resource Management Act 1991. If you are a trade competitor of the applicant, your right to be heard may be limited.
2. You may be heard on the application as a party if within 15 working days after this notice of motion was lodged with the court, you lodge a notice in form 33 with the Environment Court and serve copies of your notice on the relevant local authority and the applicant.
3. Please note that the Court has allowed any section 274 notice to be:
 - (a) Filed electronically with the Court by email to environmentcourt@justice.govt.nz ; and
 - (b) Served on the Applicant and the Council preferably by email (or alternatively by post) at the following addresses:

	The Applicant	The Council
Email	marija.batistich@tompkinswake.co.nz / kirsty.dibley@tompkinswake.co.nz	jim.stabback@aucklandcouncil.govt.nz
Post	Kristin School Charitable Trust c/- Tompkins Wake PO Box 2543, Auckland 1010 Att: Marija Batistich / Kirsty Dibley	Auckland Council Private Bag 92300, Auckland, 1142 Att: Jim Stabback

4. The Court has waived the requirement under section 274(2B) for you to serve other submitters on the application. All section 274 notices will be published on the Environment Court's website.

Advice

5. If you have any questions about this notice, contact the Environment Court in Auckland, Wellington, or Christchurch.

ATTACHMENT A

Affidavit of Mark Wilson

**BEFORE THE ENVIRONMENT COURT
AUCKLAND REGISTRY**

ENV-2021-

**I TE KŌTI TAIAO O AOTEAROA
TĀMAKI MAKĀURAU ROHE**

IN THE MATTER of the Resource Management Act 1991 (the Act)

AND

IN THE MATTER of direct referral of an application under s 127 of the Act
to cancel a condition of Resource Consent LUC80045488

BETWEEN **KRISTIN SCHOOL CHARITABLE TRUST**

Applicant

AND

AUCKLAND COUNCIL

Consent Authority

**AFFIDAVIT OF MARK WILSON IN SUPPORT OF NOTICE OF MOTION FOR
DIRECT REFERRAL**

Dated 18 February 2021

TOMPKINS | WAKE

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SWR

I, **Mark Wilson**, of Auckland, Executive Principal at Kristin School, swear:

Introduction

1. I am the Executive Principal at Kristin School (**Kristin**). I began this role in 2019. Prior to this, I was the Principal of Cashmere High School in Christchurch (from 2009 to 2019).
2. I make this affidavit in support of Kristin School Charitable Trust's (the **Trust**) notice of motion for its application to cancel a condition of a resource consent (Council reference LUC80045488) to be decided by the Environment Court (**Application**). I am authorised to make this affidavit on behalf of the Trust.

Background

3. Kristin is an independent, co-educational school with students from early childhood education through to Year 13. It is located at 360 Albany Highway, Albany on Auckland's North Shore (**Site**). The Junior, Middle and Senior Schools are all situated on the Site.
4. Prior to the Auckland Unitary Plan, the Site was residentially zoned land under the legacy Auckland Council District Plan – North Shore Section 2002, which required resource consent for most school developments and/or activities. As a result, the Trust holds several resource consents for the Site.
5. In 2005 the Trust was granted a resource consent (on a non-notified basis) under the legacy District Plan to construct an internal access road, a drop-off area / parents' car park and outdoor hard-court play area on the Site (**2005 Consent**). The 2005 Consent includes Condition 17 which is the subject of the Application.
6. Condition 17 requires the installation of bollards or a similar barrier immediately west of the roundabout at the eastern end of the existing teachers' carpark. I understand that the purpose of Condition 17 was to


SWR

prevent thoroughfare between the existing teachers' carpark (and Bass Road beyond) and the new carpark/drop off area consented as part of the 2005 Consent.

7. Since the granting of the 2005 Consent, Kristin has experienced significant roll growth and, as a result, traffic congestion at its Albany Highway entrances and within the school grounds during peak morning drop-off and afternoon pick up periods. The Albany Highway entrances are currently the only access points for buses and other vehicles to enter and exit the Site other than those staff who do so from Bass Road. The Trust has considered its options and considers that another entry/exit access point is needed to manage and reduce the congestion experienced at the Albany Highway entrances.
8. An obvious option is to make greater use of the Bass Road entrance, which under the 2005 Consent is effectively limited to those staff who use the teachers' carpark. A reason for revisiting this option is that in recent years there has been a significant upgrade of the intersection of Bass Road with the Albany Highway, including the installation of traffic lights.
9. A further change has been that the zoning of the Site has changed (under the Auckland Unitary Plan) such that it is now zoned Special Purpose – School Zone, instead of its previous residential zoning. Following this, the Trust applied for and was granted a Certificate of Compliance under s 139 of the Resource Management Act 1991. This formally records that the following activity complies with the Auckland Unitary Plan (Operative in Part) 2016:

The use of Bass Road by buses and other vehicles without limitation or restriction at 360 Albany Highway, Albany. This includes the reconfiguration (that is, the re-marking of existing all-weather parking and manoeuvring areas) and use of the existing car parking area adjacent to the Bass Road entrance as a bus parking and turn-around area.



10. It is my understanding that this Certificate of Compliance supersedes the previous 2005 Consent. However, as a precaution the Trust has decided to apply to have Condition 17 formally cancelled.
11. The Trust has therefore applied to vary the 2005 Consent by way of deleting Condition 17. This would enable the use of Bass Road by Kristin and would address the congestion experienced at the Albany Highway entrances during peak drop off and pick-up periods. It is considered that the use of the Bass Road entry/exit by buses and other vehicles will significantly reduce traffic congestion within the Site. Enabling the use of the Bass Road entry/exit will also reduce the volume of vehicles driving through the Site.
12. The Trust has volunteered replacement conditions of consent as part of the Application, to restrict the use of Bass Road by Kristin vehicles in the following ways:
 - (a) Buses would not be permitted to depart from the Bass Road entry and exit point until after 3:30pm.
 - (b) The access from Bass Road would remain closed off via the electronic gate to all users except for emergency services and staff between 2:30pm and 3:30pm on school weekdays.
 - (c) Unrestricted vehicle use of the Bass Road access by Kristin staff, parents, school buses, students and visitors would be permitted outside of the hours between 2:30pm and 3:30pm on school weekdays.
 - (d) The Trust would design and construct an upgrade to the Bass Road/Kinleith Way roundabout to accommodate the vehicle tracking curves for busses.
13. The deletion of Condition 17 is necessary to reduce the congestion at the Albany Highway access and within the Site currently experienced by


SWR

students, staff and parents during peak drop off and pick-up periods. The current system is inefficient and is becoming increasingly frustrating to manage. The proposal to make the Bass Road entry/exit as an alternative option would reduce congestion and safety issues both within the Site and on Albany Highway.

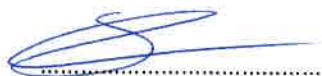
Reasons for the Notice of Motion

14. The Trust's application to vary the 2005 Consent was publicly notified by Auckland Council, and 759 submissions were received. Of these, 419 were in support and 340 were in opposition. 111 submitters stated that they wish to attend a hearing and speak in support of their submission. In addition, 307 submitters stated that if other people make a similar submission then they will consider making a joint case with them at the hearing.

15. If the Application were heard by the Council at first instance, given the number of submissions there is a high likelihood that the decision would be appealed to the Environment Court, and the process would become unnecessarily prolonged. This issue has been under consideration by the Council for some time and has already incurred substantial costs for the Trust. The Trust considers that direct referral will enable the congestion issue experienced at Kristin School to be addressed in a cost-effective and timely manner, while also enabling public participation in the process.

Signature of Deponent: 
Mark Wilson

SWORN by the abovenamed Mark Wilson at Auckland this 18 day of February 2021 before me



A Solicitor of the High Court of New Zealand

Stephanie June Reddy
Associate
Davenports Law
Auckland

Solicitor


SWR

ATTACHMENT B

List of Names and Addresses of Persons to be served

	Name	Email address for service	Physical address for service
Regulatory Authority			
1.	Auckland Council Attn: Jim Stabback	jim.stabback@aucklandcouncil.govt.nz	Auckland Council Private Bag 92300, Auckland, 1142 Att: Jim Stabback
Submitters on Wynyard Hobson Application			
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2.	K Acraman	"0273007688	34 Kinleith Way Albany Auckland 06032
3.	O Adil	omaire@gmail.com	12/427 Albany Highway Albany Auckland 0632
4.	R Ai	annieai@sina.com	29 Para Close Fairview Heights Auckland 0632
5.	Albany Primary School Board of Trustees	bot@albany.school.nz	6 Bass Road Albany Auckland 0632
6.	A An	ann.an275@me.com	24 Major Henry Greens Millwater Auckland 0932
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9.	C An	anchaonz@gmail.com	9 Excelsa Place Albany Auckland 0632
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131.	X Cui	chinanz15@gmail.com	10 Landing Drive Albany Auckland 0632
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145.	G Differthal	448 1191	3B Sample Road Albany Auckland 0632
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151.	I Dobie	dobiesan8@gmail.com	20 Bass Road Albany Auckland 0632
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153.	J Dong	donxi859@gmail.com	4/361 Paremoremo Road Albany Auckland 0632
154.	D Dou	qbabynz@yahoo.com	21A Compton Street Hillcrest Auckland 0627
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156.	R Drake	"02102774110	35 Kinleith Way Albany Auckland 0632
157.	B Du	jasminedu@gmail.com	23 Pin Oak Drive Schnapper Rock Auckland 0632
158.	T Du	stonecolddy@gmail.com	544 Beach Road Murrays Bay Auckland 0630
159.	I du Plooy	imkeduplooy@gmail.com	16 Sample Road Albany Auckland 0632
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