

28 April 2022

Steph Taylor  
steph@incite.co.nz  
By email

Dear Steph

**Request for further information in accordance with section 92 of the Resource Management Act 1991**

**Notice of requirement:** Ministry of Education – alteration to designation # 4992, Sir Keith Park School, Robertson Road Mangere – to alter the boundaries of the existing school site to include 31 Robertson Road.

I am writing with respect to the notice of requirement described above.

After completing a preliminary assessment of the notice of requirement documents, it is considered that further information is required to enable an adequate analysis of the proposal, its effects on the environment and the way in which any adverse effects on the environment may be mitigated.

The information requested below will enable the council to undertake a full and proper assessment of the notice of requirement and provide a recommendation on it.

Under section 92 of the Resource Management Act 1991, in association with Council's transport consultant, I request the following further information on traffic/transport grounds:

**Traffic surveys**

Several surveys of travel and parking behaviour were undertaken on 15 and 16 June 2021 when Auckland was at Alert Level 1 and general travel behaviour was abnormal. It is not clear from the information provided how the school was operating at the time of the surveys, such as learning being conducted online or in other ways, or measures such as excluding parents from the site.

**T1. Please provide information about school operations on 15 and 16 June and how any variance from pre-covid operations may have affected the travel surveys.**

**Staff and Staff Parking**

The Transport Assessment [TA] notes the numbers of staff currently is 54 regular and 7 itinerant and refers to whole school events when all students attend the main site [along with staff] and/or at other times.

**T2. Please confirm how many people were working at or from the school on 15 and 16 June 2021 to allow a better understanding of the travel and parking surveys. It would be useful to also identify the full-time equivalent number of staff, the number of staff normally present, and the maximum number present at any one time and how often that would occur.**

The TA provides the results of a parking survey within Bingara Place, and notes that some staff park on that street but does not indicate how many staff or other cars were parked on the site other than as part of the pick-up and drop-off [PUDO] operations.

**T3. Please provide information on the maximum number of cars parked within the school site during the school day, excluding taxi and parent vehicles in the PUDO area.**

### **Teaching Spaces**

The TA notes the school has “around 7 teaching spaces” at present, and this could increase to 16 or 18 teaching spaces in future. The school is subject to the standard education designation conditions, including a condition requiring parking to be provided based on “classrooms or classroom equivalents” and it is assumed each teaching space is a classroom equivalent. However, there are other spaces onsite used for teaching spaces and it is not clear which, if any, of these spaces would be considered as a “classroom equivalent” for the purposes of designation conditions.

The TA discusses the likely parking demand based on the standard condition and the number of Teaching spaces, but not the existing parking demand. The TA also notes that this school is different from most other schools. With respect to transport there are several distinct differences including the staff to student ratio, the number of staff per teaching space, and what constitutes a teaching space.

**T4. Please confirm what spaces are assumed to be teaching spaces for the purposes of the parking assessment and which spaces would be considered a classroom equivalent.**

**T5. Please provide an estimate of future parking demand based on the existing parking demand observed at the school on a per-student, per staff member and per-classroom equivalent basis.**

**T6. Please confirm if the transport effects of this school, which is distinctly different from other schools, are proposed to be managed through the standard designation condition minimum parking requirement.**

### **PUDO Operation**

The TA provides a description of the proposed PUDO facility and operation noting that there is space for 12 to 13 vans to be accommodated and assumes that one or two vans could be unloaded simultaneously.

The feasibility concept design that the TA is based on, shows three spaces closest to a building entrance with sufficient space to operate a rear-loading wheelchair lift. The remaining 9 or 10 PUDO spaces are shown as parallel parking spaces without sufficient space to operate a rear-loading lift.

From the information provided it is not clear how the PUDO is proposed to operate. Is it intended that the 9 or 10 spaces are proposed to operate as a queue then all other vehicles move along by one space, and vehicles arriving at the site join the rear of the queue; or would students be unloaded from any position and new vehicles arriving would travel along the PUDO area looking for an empty space?

**T7. Please explain how the PUDO area required by the proposed condition would operate.**

The existing operation with 78 on-site students generates 15 van trips. The assessment of proposed operation assumes a 54% increase to 120 on-site students. If the existing pattern of transport behaviour continued, that would suggest there would be in the order of 23 van trips. The TA assumes that no more than 20 van trips would be required on the basis that each taxi van would carry several students. It is not clear what the basis for this assumption is.

The TA provides an estimate of the maximum number of vehicles in the PUDO area for three scenarios. The maximum number of vehicles in the PUDO area is sensitive to the arrival time of vehicles and earlier arrival times could result in a higher number of vehicles present.

**T8. Please provide additional analysis that considers the use of 23 vans using the existing arrival pattern.**

The TA describes school bells at 8:45am in one location and 8:30am in another location.

**T9. Please clarify the school start and finish times.**

**Access**

The feasibility concept design shows the relocated exit driveway on Robertson Road requiring the removal of a large palm tree in the roadside berm.

**T10. Please provide further information regarding the removal of the palm tree in the road along with any mitigation, or an assessment of the ability to implement the desired changes without removing the palm tree.**

Just to let you know I have also received a further comment from Auckland Transport [Catherine Absil-Couzins]. AT note that with the proposed site redesign there is the possibility of the existing vehicle crossings being changed along with the addition of new vehicle crossings. AT request that MoE identify any vehicle crossings which are planned to be removed and reinstated. This could occur at the OPW stage and AT note that this could also be added to the recommended/already discussed conditions [email dated 7 April].

AT have proposed/ included an amended condition which states

1. Outline Plan of Works requirements ..... **b vii. Identification of any redundant existing vehicle crossings which will need to be removed and reinstated**

AT also indicate that they are happy for this to be altered as appropriate.

Theoretically you should provide this information within 15 working days of the date of this email. However, I am happy for this to be more flexible. Please let me know about potential timeframes in due course.

In accordance with the Resource Management Act, processing of your notice of requirement will remain on hold, pending your response to this request. Please note that the processing clock will stop as this is the first request for additional information.

If you have any queries regarding the above, please contact me on 021 823 685 or by email.

Yours sincerely,

*Ledda*

Vanessa Ledda  
Policy Planner  
Central / South  
Plans and Places