From: [redacted]
To: Chris Khouri; [redacted]
Cc: [redacted]
Subject: RE: Kumeū Secondary School NoR Lodgement - Minister of Education
Date: Thursday, 19 March 2026 3:29:39 pm
Attachments: image006.png
image008.png
image009.png
MoE Response to Further Info Request - Kumeū Secondary New Site - D002497.01.pdf

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Hi Chris

Further to the Minister's further information response yesterday, a change has been made to the response table in relation to point A3.

Auckland Transport – Advisory comments on designation conditions			
#	Provision	Comment/Recommendation	
A3	Condition 4: On-Site Car Parking and Pick Up and Drop Off	AT recommends the deletion of Condition 4 in its entirety. The draft conditions already state that the standard conditions for all Minister of Education (which include a car parking condition) do not apply. In addition, AT supports on-site PUDO.	The Requiring authority prefers to keep a condition clarifying there is no specific on-site car parking or PUDO minimum standards and that this will be addressed in outline plans to avoid confusion and ensure clarity for plan users. However, as worded it doesn't make sense, so the condition should be amended to the following: *There are no onsite car parking or pick up and drop off facility conditions for this designation. Car parking and pick up and drop off will be determined for each development phase increasing teaching space numbers and will be addressed in the outline plan for that phase..*

Can you please replace the previous version of the response table with this one.

Thanks

Chris Horne
Director

INCITE

PO Box 3082
Auckland 1140

[redacted]
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From: Chris Khouri <chris.khouri@aucklandcouncil.govt.nz>
Sent: Wednesday, 18 March 2026 4:08 pm
To: Chris Horne <[redacted]>; Gemma Hayes <[redacted]>
Cc: Peter Vari <[redacted]>; Rod Aros Aravena <[redacted]>
Subject: RE: Kumeū Secondary School NoR Lodgement - Minister of Education

Hi Chris,

Thanks for your email. I'll seek our specialists' review of this response and come back to you in due course.

Kind regards,

Chris Khouri / Policy Planner
Regional, North, West & Islands Planning
Planning & Resource Consents
Auckland Council, Level 16, 135 Albert Street, Auckland Central
Visit our website: www.aucklandcouncil.govt.nz

Together we can create an Auckland we can all be proud of.

From: Chris Horne <[redacted]>
Sent: Wednesday, 18 March 2026 9:59 am
To: Chris Khouri <chris.khouri@aucklandcouncil.govt.nz>; Gemma Hayes <[redacted]>
Cc: Peter Vari <[redacted]>; Rod Aros Aravena <[redacted]>
Subject: RE: Kumeū Secondary School NoR Lodgement - Minister of Education

Good Morning Chris

Further to the request for further information dated 13 February 2026, please find attached the response from the Minister of Education.

We look forward to this matter now moving forward to notification.

Regards

Chris Horne
Director

INCITE

PO Box 3082
Auckland 1140

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From: Chris Khouri <chris.khouri@aucklandcouncil.govt.nz>
Sent: Friday, 13 February 2026 11:54 am
To: Gemma Hayes <[redacted]>; Chris Horne <[redacted]>
Cc: Peter Vari <[redacted]>; Rod Aros Aravena <[redacted]>
Subject: RE: Kumeū Secondary School NoR Lodgement - Minister of Education

Mōrena Gemma,

Please find attached the s92 letter for this NoR.

Any queries, feel free to get in touch.

Kind regards,

Chris Khouri / Policy Planner
Regional, North, West & Islands Planning
Planning & Resource Consents

Notice of requirement: Kumeū Secondary New Site - D002497.01

Ministry of Education Response to Further Information Request

Information Request	***Applicant Response***
Transport/Traffic	
Trip Generation	
1. Please demonstrate that the mode share in Table 3 of the Integrated Transportation Assessment (ITA) derived from the average mode share for secondary schools in 2020 is appropriate for a secondary school in a location which has relatively limited access to public transport, and where active modes from the wider area that the school is anticipated to serve may be limited. *Reason/s for request:* • *Further information is required to justify the use of the average mode share for all secondary schools within the Auckland Region to a school that has relatively limited access to public transport and has a catchment where active modes may be limited due to the extent of surrounding rural roads. An indication of mode share from the Huapai District School would provide a useful comparison but noting the smaller catchment area for the school which could affect the proportion of active modes travelling to and from the school.*	The catchment areas that are most likely to impact on the key intersections on SH16 have public transport options, as explained in more detail in Abley's memo. The modal share adopted for the analysis in the ITA is considered appropriate.
2. Please amend the public transport mode share to reflect similar school catchments with a urban / rural and small town mix, as requested by AT. Alternatively, further justify the application of a 30% public transport mode share to the proposal. *Reason/s for request:* • *To better understand the traffic and transport effects of the proposal and the ways in which any adverse effects may be mitigated.*	As per item 1, the catchment areas that are most likely to impact on the key intersections on SH16 have public transport options, as explained in more detail in Abley's memo. The modal share adopted for the analysis in the ITA is considered appropriate.
3. Please provide justification for the use of a vehicle occupancy mode share of 1.4 students per vehicle in the calculation of the trip generation (ITA Table 4).	The vehicle occupancy rate is a function of the duration of years a student attends school, and therefore the likelihood of having a sibling at the same school. Given the Secondary and Primary school at the same site, the student occupancy is expected to be significantly higher

Reason/s for request: *• The trip generation uses the assumption that vehicles would have an average student occupancy of 1.4 students per vehicle. Further information is required to justify this assumption*	and the rate of 1.4 students per vehicle is considered conservative. See Abley's memo for more detail.
4. Please provide an assessment of the trip generation effects on the Station Road / Schoolside Road intersection, as requested by AT. *Reason/s for request:* *• To better understand the traffic and transport effects of the proposal and the ways in which any adverse effects may be mitigated.* *• The additional traffic movements generated by the proposed school have the potential to adversely affect the intersection of Station Road and Schoolside Road. Improvements may be required to this intersection to enhance the safety and efficiency of traffic movements and reduce congestion*	More information on the trip generation and distribution is provided in Abley's memo.
<u>Traffic Modelling</u>	
5. Please provide SIDRA model layout drawings and modelled traffic signal phasing (where appropriate) for the three intersections modelled. Reason/s for request: • SIDRA modelling has been undertaken. To be able to assess whether the intersections have been modelled correctly, the SIDRA model layouts and the modelled traffic signal phasing is required.	Provided in Appendix A of Abley's memo.
6. Please provide traffic modelling output without the proposed school traffic of the SH16 / Station Road and SH16 / Trigg Road intersections. *Reason/s for request:* *• Traffic modelling of the existing intersections without any development traffic is required to* *understand the effect of the addition of the school traffic.*	Provided in Appendix A of Abley's memo.
7. Please provide evidence that the traffic modelling of the SH16 / Station Road and the SH16/Trigg Road intersections is calibrated against existing traffic conditions (e.g. queue lengths and delays). *Reason/s for request:* *• Evidence of calibration of the traffic modelling is required to confirm that the traffic models represent the actual intersection operation.*	All intersections are calibrated with queue lengths, as outlined in Abley's memo.

8. Please provide data that supports the distribution of school related traffic presented in Figure 13 of the Integrated Transportation Assessment (ITA). *Reason/s for request:* *• To understand how the distribution of school traffic presented in Figure 13 of the ITA has been derived and to justify this distribution, the data that has been used to derive the distribution is required.*	More details of the trip generation and distribution has been provided in Abley's memo.
<u>Car Parking</u>	
9. Please confirm whether school students would be provided car parking within the school site. *Reason/s for request:* *• Details of where students who drive to school will park is required to understand the potential effects of car parking on the surrounding road network, including effects on pick up and drop off for the Huapai District School or the proposed school.*	It is not currently envisaged that on-site car parks will be provided for students. That is ultimately a matter for the Board of Trustees. However, the traffic assessment does not assume students will park on site.
10. Further to item 9 above, please provide an assessment of the effects of student parking on the surrounding road network, including Pick Up Drop Off (PUDO) activity for the Huapai District School and the proposed school, if student parking is proposed to be on-street. *Reason/s for request:* *• An assessment of the effects of student parking on the surrounding streets is required to understand the potential effects on the safe and efficient operation of the surrounding road network including the operation of the Huapai District School. The earlier start time for the proposed school could result in on-street parking currently used for drop-off may be utilised by students impacting on the PUDO activity of the existing school.*	The School Travel Plan will promote and encourage areas where students should park so as not to impact on PUDO activity. More details in Abley's memo.
11. Please provide details of what on-site car parking provision will be provided for staff and visitors. *Reason/s for request:* *• The proposed designation conditions do not include details of parking rates for staff or visitors, other than parking required for additional classrooms in the event that the school is expanded. Therefore, it is not clear what parking is*	Some level of on-site car parking will be provided for staff and visitors. The exact amount will be determined as part of detailed design and at the outline plan stage for any development stages. The initial outline plan and any subsequent stages involving 6 or more classrooms will require a transport assessment to help inform a suitable number of on-site car parks.

proposed to be provided for staff or visitors during the establishment of the school.	
<u>Pick Up Drop Off Operation</u>	
12. Please provide an assessment of the operation of the PUDO that demonstrates that there is sufficient capacity within the PUDO to accommodate the forecast traffic. The assessment should consider the different characteristics of the AM and PM peak PUDO operation, noting that caregivers often arrive early to wait for students. The assessment should also take into account the existing PUDO activity for the Huapai District School if there are overlaps between the activities in terms of location and/or time. Please also refer to item 13 below. *Reason/s for request:* *• The ITA provides various options for the PUDO but does not provide an assessment to demonstrate that there would be sufficient capacity for the PUDO to accommodate the forecast traffic volumes either during the start or at the end of the school day.* *• It is noted that, in general, at the end of the school day caregivers frequently arrive early and there are much longer dwell times. It has also been observed on site that caregivers dropping off students for the Huapai District School often walk their children into the school, which affects the length of time cars are parked.* *• Extended parking times can impact on the efficient operation of the PUDO and affect the operation of the surrounding road network.* *• Additional assessment is required to understand whether the PUDO activity can be efficiently managed without affecting the safe and efficient operation of the road network.*	The primary and secondary school PUDO activities are not expected to overlap, allowing each school to use all available on-street parking and reducing congestion outside the school gate. Caregivers often arrive at primary schools ahead of time to ensure their young children are not left waiting outside alone. This concern is less common with secondary schools, as older students are generally more independent. Consideration should be given to the operation of PUDO when deciding on school finish times for each of the schools e.g. the PUDO operation is likely to operate more effectively if the secondary school finishes the school day after the primary school. It is unknown what PUDO facility will be provided at this early stage as this will be decided at OPW. See response to Item 13.
13. Please provide an assessment of the operation of an on-site PUDO facility, taking into account the effects of forecast queue lengths for vehicles exiting an on-site facility, which would impede movements into and along the PUDO. *Reason/s for request:* *• The traffic modelling of the site access forecasts queues in excess of 100m. If these queues were to* *occur, this would impact the operation of the PUDO resulting in vehicles not being able to enter or leave car parking spaces which would impact on the adjacent road network. Further information is required to demonstrate that a*	The SIDRA model for school access was conservative, assuming a single entry and exit point. In practice, separate entry and exit points would likely allow for more efficient operations if an on-site PUDO is provided at OPW stage. More details are provided in Abley's memo.

PUDO can operate efficiently without affecting the safe and efficient operation of the road network.	
14. Please provide more information about the PUDO operation to demonstrate that such facilities can be accommodated without adversely affecting the safety and efficiency of the adjoining transport network for all modes. Note that AT does not support the suggestion that PUDO could be accommodated on the adjacent public roads. *Reason/s for request:* *• To better understand the traffic and transport effects of the proposal and the ways in which any adverse effects may be mitigated.*	As per Item 13, the SIDRA model for school access was conservative, assuming a single entry and exit point. In practice, separate entry and exit points would likely allow for more efficient operations if an on-site PUDO is provided at OPW stage. More details are provided in Abley's memo.
15. Please provide details as to how vehicles dropping off and picking up students on-street on Trigg Road and Station Road will be able to turn around safely and efficiently. *Reason/s for request:* *• The ITA states that vehicles using Trigg Road are anticipated to exit the same way as they arrive. This is also implied in the traffic modelling assessment for Station Road. Information is required to understand how vehicles would be able to turn around within the road reserve on Station Road Trigg Road in a safe and efficient manner.*	It is unknown at this stage what the PUDO arrangement may look like at OPW stage. However, drivers using Station Road and Trigg Road to pick up / drop off students will need to find a safe place to turn around or drive around the block. More detail is provided in Abley's memo.
<u>Transport Infrastructure</u>	
16. Please provide details as to how there will be certainty that the recommended transport infrastructure in Section 7 of the ITA will be assessed and implemented as part of the future Outline Plan of Works (OPW). *Reason/s for request:* *• Information is required to understand how the recommended transport infrastructure identified in the ITA will be assessed and provided in the subsequent OPW.*	Proposed condition 6(c)(ii) proposed by AT can address this, as outlined below in this table. This additional clause in the condition is agreed.
17. Please demonstrate that it is feasible to provide a pedestrian crossing on Station Road along the site frontage and that vehicle crossings for a PUDO can be provided safely (including demonstrating that there is sufficient visibility at the vehicle crossing(s)). *Reason/s for request:*	Sight lines on Station Road are good, with good visibility along at least half of the frontage. There is good visibility at the southern and northern end of the frontage in the event that a PUDO along the Station Road frontage is proposed. There are also points along the frontage which have adequate visibility for a new pedestrian crossing. The exact location of the crossing will be determined at OPW stage, however the photos and assessment in Abley's

• *Section 5.8 of the ITA recommends the provision of a pedestrian crossing on Station Road. In addition, if an on-site PUDO is provided new vehicle crossings will be required on Station Road. Further information is required to demonstrate that a pedestrian crossing on Station Road along the site frontage is feasible and that there is sufficient visibility along Station Road to provide new vehicle crossings for a PUDO.*	memo should provide assurance that visibility can be achieved for new access points and pedestrian crossings.
18. Please provide details of what measures will be provided to enable buses to serve the proposed school given there are no bus stops on the western side of Station Road for northbound buses. *Reason/s for request:* • *There are no bus stops on Station Road along the site frontage. The nearest bus stop for northbound buses on Station Road is on Schoolside Road, over 450m away from the school. Further information is required to understand what measures the school will promote public transport use to achieve the assumed 30% public transport mode share, including providing for buses.*	The bus route (123) travels in a one-way look around the Huapai triangle i.e. Schoolside Road / Nobilo Road. Therefore students can use the two bus stops on Station Road for northbound buses.
19. Please provide further information, such as an indicative school bus network and expected number of buses, showing how rural townships within the school catchment can be serviced by school buses, as requested by AT. *Reason/s for request:* • *To better understand the traffic and transport effects of the proposal and the ways in which any adverse effects may be mitigated.* • *This information is not included in the ITA or addressed specifically in proposed designation conditions. The school bus network will influence trip generation and mode share for the school, and the on-site parking and access requirements for buses.*	Dedicated school buses are not proposed for the high school at this stage. This may change at later planning stages.
20. Please provide more information to show how access for all modes can be provided to the proposed school and how the effects of such access on the safe and efficient operation of the surrounding transport network can be mitigated, as requested by AT. In particular, AT seeks further information about the following: ⇒ how the existing formed accesses from Station Road and Trigg Road to the existing primary school would be upgraded to accommodate access to the proposed school and; ⇒ turning treatments, vehicle tracking and sightlines at access points.	This level of detail will be provided at OPW stage. Sightlines at access points are provided in the ITA and in Item 17 of Abley's memo.

Reason/s for request: *• To better understand the traffic and transport effects of the proposal and the ways in which any adverse effects may be mitigated*	
21. Please provide more information on the proposed Station Road frontage upgrade (including corridor widths), as requested by AT. *Reason/s for request:* *• To better understand the traffic and transport effects of the proposal and the ways in which any adverse effects may be mitigated.* *• Station Road is anticipated to be a key connector road when the Te Tupu Ngātahi Supporting Growth Alliance designations are given effect to. The road frontage information will provide clarity for AT and the applicant to understand future improvements that may be required on Station Road*	The Station Road frontage is likely to mirror the cross-section that has been recently constructed immediately north of the site. Further safety measures may be introduced on the school frontage to ensure safe access into school for all modes.
Geotechnical	
22. It is noted that Table 2 presents ULS PGA of 0.19g considering a 500-year return period. However, according to Table 5.1 of Designing Schools in New Zealand – Structural and Geotechnical Requirements, Version 3.0 October, for IL3 building, the return period for ULS event can be up to 1000 years. Please clarify why this has been omitted from the geotechnical assessment.	Table 2 notes that the ULS return period is ≥ 500 years because in the greater Auckland area (including the site area), the design earthquake magnitude (M) and peak ground acceleration (PGA) are the same for the 500 year and longer return periods. Therefore, the IL3 scenario has been explicitly included and considered in the site liquefaction assessment.

Table 5.1: Importance levels and return periods for seismic design of school buildings.

Description	Importance Level	School Building Use[1]	Return Periods		
			SLS1	SLS2	ULS
Low risk associated with human life, or economic, social or environmental consequences	IL1	Small ancillary buildings that are not usually occupied (e.g. isolated garages) and <30m².	n/a	n/a	100 years
Medium risk associated with human life, or economic, social or environmental consequences	IL2	Larger ancillary buildings (e.g. Boiler Houses and standalone administration offices)	25 years	n/a	500 years
		Buildings of lightweight construction, with less than 250 occupants[1] in a block [3]	25 years	100[4] years For secondary structural and non-structural elements only[5]	500 years
		All buildings of heavy construction, with less than 250 occupants[1] in block[3]	25 years	100[4] years	500 years
High risk associated with human life, or economic, social or environmental consequences	IL3	Buildings of lightweight construction, with 250 or more occupants[1] (IL3)	25 years	250[4] years For secondary structural and non-structural elements only[5]	1000 years
		All buildings of heavy construction[6], with 250 or more occupants[1]	25 years	250[4] years	1000 years
		Assembly halls, gymnasiums, performance arts buildings etc. where occupants may congregate	25 years	250[4] years	1000 years

Healthy Water	
<u>*Kumeū Form 18 Final*</u> 23. Proposed condition 5(e) states "that an outline plan of works or outline plan waiver shall not be required for installing … any ground infrastructure services such as stormwater." Given this proposed condition, please clarify the mechanism or process that will ensure the proposed stormwater design including attenuation tanks, bioretention device, wetland and dry basin is implemented as relied upon to manage flooding effects. *Reason/s for request:* • *To ensure new stormwater infrastructure is installed as proposed to mitigate for flooding effects.*	The intent of condition 5(e) is that an outline plan is not needed for physical infrastructure in the ground. Regional consents are still required to be held in relation to stormwater design, including in relation to run off from impervious surfaces, or new or changed discharges. The clause as proposed does not affect the obligation to consider changes to overland flow where relevant (outline plans require consideration of changes to site contours). Double handling of these matters via an outline process is unnecessary and not agreed
<u>*Infrastructure Report Rev A, 18/12/2025 (Sections 1.2.1 & 2.1.3)*</u> 24. The selected site is located upstream of an area at risk to life and property due to existing flooding and is flagged as requiring appropriate	Agreed in part. Proposed amendments to the conditions and the reasons are set out further below in regard to Healthy Waters' proposed track changes to the outline plan scope condition.

stormwater management to avoid exacerbating downstream flooding. Attenuation principles are proposed to limit post development 1% AEP peak flows to 80% of predevelopment rates, an approach supported by HWFR to manage downstream flood risk, however: Please clarify the mechanism or process at the OPW stage that will ensure the proposed stormwater attenuation approach (to limit post-development 1% AEP peak flows to 80% of predevelopment rates) is implemented as relied upon to manage flooding effects. *Reason/s for request:* *• To ensure new stormwater infrastructure is installed as proposed to mitigate for flooding effects.*	
Noise	
25. Please provide the following information: a) Construction noise conditions to be provided in the designation; b) A noise report for assessing the operational noise; and c) A construction noise report or CNVMP for management of construction noise and vibration. The noise reports should be prepared by a suitably qualified noise consultant. *Reason/s for request:* *• There is no noise assessment report in the application to demonstrate the compliance with the noise standards, for examples, high vehicle trips are predicted at the school's peak times, given the residential houses being located along the access, this noise may generate noise exceedances.*	The operational noise condition is effectively the standard Auckland wide noise condition for schools in Auckland aside from minor editing (see standard condition 2 in Appendix C of AEE). This is a long accepted standard Auckland school designation noise conditions that has not typically required a noise assessment support since the Unitary Plan has been in force. The construction noise standard is effectively the existing construction noise standard in the standard school noise condition in the Unitary Plan (Standard Condition 2), but with modification to reflect how NZS6603:1999 is intended to work, in that where the upper limits of the standard are exceeded, a CNVMP is required. A CNVMP is not necessary at the designation phase as there is currently no design of construction methodology to assess. A specialist noise assessment is not considered to be required in regard to the noise conditions.
Soil Contamination	
26. Please provide a Detailed Site Investigation. *Reason/s for request:* *• As WWLA has identified in the PSI that the site has been subject to HAIL activities, the NES:CS applies to the land. Consent under AUP Chapter E30 may also be required.*	The Minister does not agree to providing a DSI as part of the designation stage. The PSI confirmed the site was in part in use for horticultural activities, prior to the 1980s. Soil sampling (a DSI) will be required to confirm actual contamination concentrations and the potential risks to human health and/ or the environment as part of the subsequent

	resource consent application that will be required. The NoR/designation does not replace the need for consent under the National Environmental Standards (such as the NESCS3) or Chapter E30 of the Auckland Unitary Plan (i.e. regional plan consents). As set out in the PSI, contaminants are most likely to be diffusely distributed in topsoil and given at least 40 years has lapsed since horticultural activities ceased, it is highly unlikely that pesticide residues will remain at concentrations that present an unacceptable risk to human health. Any asbestos or lead contamination present will likely be localised around buildings. A proposed sampling plan to be implemented as part of a DSI for resource consent was provided in the PSI and interim SMP. Any contamination that may be present can be managed with standard earthworks controls and targeted remediation (if required) and does not present a constraint to designation of the land for the purpose of a school. See attached memo from Williamson Water and Land Advisory on this matter.

Recommendations (non s92 matters)

Suggestion provided			**Applicant Response**
Auckland Transport – Advisory comments on ITA			
#	Section/ Topic	Comment	Noted. There are safe options for students to cross SH16 to access Bus services 125 – see further detail and map of SH16 crossing points in Abley's memo.
A1	Bus routes	The ITA (sections 3.2 and 7) suggest that AT should be requested to provide additional Route 123 buses at school start and finish times. The 123 bus route is an hourly service. AT notes that this route would only be useful for school pupils living at the west end of Kumeū, which is a small residential catchment. The number of pupils likely to use the service may not warrant additional services during off-peak times. If students use the 122 or 125 bus routes,	

		AT has concerns about student safety. There is no pedestrian crossing across SH16 for students to safely access eastbound bus services	
A2	Station Road	AT supports frontage upgrades to Station Road as recommended in section 5.8 of the ITA. AT notes that the pedestrian and cycling infrastructure should be to standard at time of construction.AT also notes the critical role Station Road plays in servicing future growth in the Kumeū-Huapai portion of the north-west growth area. It will be important in providing improved traffic safety, and transport connectivity to the future rapid transit network, employment zones, and social infrastructure. Supporting Growth identified this as a potential arterial road for designation in the Indicative Business Case with a 24m wide corridor being the preferred alignment. The route was subsequently not identified as a priority for designation as part of the Supporting Growth work. However, Station Road remains part of the strategic transport network, and a 24m wide arterial is still the envisaged future form. Any existing parking within the corridor may need to be removed in future and this needs to be taken into account in planning for the school.	Noted.
Auckland Transport – Advisory comments on designation conditions			
#	Provision	Comment/Recommendation	
A3	Condition 4: On-Site Car Parking and Pick Up and Drop Off	AT recommends the deletion of Condition 4 in its entirety. The draft conditions already state that the standard conditions for all Minister of Education (which include a car parking condition) do not apply. In addition, AT supports on-site PUDO.	The Requiring authority prefers to keep a condition clarifying there is no specific on-site car parking or PUDO minimum standards and that this will be addressed in outline plans to avoid confusion and ensure clarity for plan users. However, as worded it doesn't make sense, so the condition should be amended to the following: *There are no onsite car parking or pick up and drop off facility conditions for this designation. Car parking and pick up and drop off will be determined for each development phase increasing teaching space numbers and will be addressed in the outline plan for that phase..*
A4	Condition 6: references to PUDO	It is AT's view that PUDO to accommodate demand should be provided within the footprint of the designation. This is the most effective way of	The changes proposed by AT are not agreed.

		providing safe PUDO and minimising adverse effects on the adjoining transport network. It is also not clear why the school travel plan is referenced in Condition 6(b)(iii). The following amendments to Condition 6 are therefore recommended: **Condition 6(a)(ii)** *The general location of on-site parking areas (including buses, cars, cycle and scooter parks), and ~~any~~ on-site pick up and drop off areas ~~if proposed.~~* **Condition 6(b)(iii)** On-site pick-up and drop-off (PUDO) area(s), ~~if proposed,~~ including ensuring their design ~~manages~~ accommodates demand ~~(to the extent enabled by the School Travel Plan),~~ ~~including~~ and provides for vehicular access, circulation, and manoeuvring for cars and buses ~~(if required).~~	There is already bus parking on the road for the primary school that may be able to be shared for school trip buses. The school will determine what on-site bus provision may be necessary including circulation. This may be tighter than what may otherwise be required for public bus manoeuvring to ensure efficient use of on-site space. Any on-site PUDO may not accommodate all demand onsite at peak times. Peak demand is only short term.
A5	Condition 6(b)(iv)(a)	The recommended conditions do not require the Transport Assessment to consider the potential effects of the school on the safe and efficient operation of the surrounding transport network. Condition 6(b)(iv)(a) should therefore be amended as follows: **Condition 6(b)(iv)(a)** Potential effects on the safe and efficient operation of the surrounding transport network, the proposed access points, school frontage and the internal school circulation.	The changes proposed by AT are not agreed. Reference to the surrounding transport network is considered to be too wide and uncertain. General school feasibility is determined at the designation stage, with subsequent outline plans focused on school design and the school interface with adjoining roads, along with any updates to the school travel plan
A6	Condition 6(c)	AT supports the recognition of consultation and engagement with AT in this conditions. However, additional wording is recommended to give more direction about the content of the engagement. **Condition 6(c)** *A summary of the consultation and engagement with Auckland Transport recording agreements*	The proposed changes are agreed.

		reached on the matters described below, and effects associated with the school on the adjacent existing and future transport network. A copy of the draft Design Concept Plan and draft Transport Assessment prepared to support the Establishment Outline Plan shall be provided to Auckland Transport for the purposes of this consultation and engagement. The specific transport matters to be considered and discussed include: *(i) Measures and treatments to ensure safe access is provided to the school for all transport modes* *(ii) Measures and treatments to the adjoining road network, such as those included in Auckland Transport design standards which apply at the time of the preparation of the Establishment Outline Plan. These may include road widening, pedestrian and cycle facilities (crossings and paths), right turn bays, signs, road markings (e.g. No Stopping At All Times (NSAAT)), traffic management and calming measures to support forecast increases of traffic and travel modes that are attributed directly to school traffic and transport;* *(iii) Bus access and the location of bus stops and shelters adjacent to the school.* *(iv) The provision of footpaths on pedestrian routes.*	
A7	Condition 6: Cycleway	Providing safe separated cycle facilities along the Station Road frontage may require removal of current on-road carparks and a bus stop. AT recommends this should be covered by a condition as follows: ***Condition 6(b)(vi)***	Proposed condition is agreed.

		If Station Road has not been constructed to Auckland Transport's urban road standard with separated walking and cycling facilities along the full school frontage at the time the first outline plan is submitted, the transport assessment shall detail how Station Road will be constructed to an urban road standard from the school boundary to the road centreline, unless any alternative standard is approved by the road controlling authority, prior to the school opening.	
A8	Condition 7: Subsequent Outline Plan of Works	AT is of the view that an updated transport assessment should be provided for all increases in teaching spaces i.e. not only if the increase is six or more. It is important that ongoing assessment occurs parallel with increases in numbers of students. Condition 5 already satisfactorily addresses the types of works that do not require an outline plan. The following amendments to Condition 7 are therefore recommended: ***Subsequent Outline Plan of Works*** *Where any subsequent proposal arises that increases the number of teaching spaces ~~by six or more~~, or modifies any vehicle access, the Requiring Authority shall submit an Outline Plan which includes the following information:* *a) A Design Concept Plan for the site showing the matters set out in Condition 6(a).* *b) An updated Transport Assessment prepared by a suitably qualified traffic engineer / transportation planner, which addresses all matters listed in Condition 6(b);* *c) A summary of engagement and consultation with Auckland Transport in accordance with Condition 6(c).*	A threshold of six classrooms is considered reasonable in terms of potential changes in effects before a further transport assessment is required. This has been agreed by Auckland Council and Auckland Transport for other school designations at Mangere College and Chapel Downs School and is the approach the requiring authority wishes to adopt moving forward.

		~~*For development of classrooms or buildings that increase the number of teaching spaces by fewer than six, an outline plan (if required and a waiver is not granted), shall not need to include the matters in (a) (c) above.*~~	
Ecology – recommended advice notes to be included			
Advice Notes: *<u>The Wildlife Act 1953</u>* • *All native lizards are absolutely protected under the Wildlife Act 1953 under which it is an offence to disturb, harm, or remove them without a permit from the Minister of Conservation.* • *Almost all native bird species are absolutely protected under the Wildlife Act 1953. It is an offence to deliberately disturb or destroy them, their eggs or nests. By restricting vegetation clearance to outside of the main native bird breeding season the risk of disturbing nesting forest birds is significantly reduced (but not entirely eliminated), therefore vegetation should still be checked for obvious signs of nesting activity prior to clearance works being undertaken.* *All bats are absolutely protected under the Wildlife Act 1953 under which it is an offence to disturb, harm, or remove them without a permit from the Minister of Conservation.*			The Minister accepts the proposed advice note in regard to the Wildlife Act 1953.
<u>Stream Assessment</u> • *An overland flow path onsite has been identified as potentially being an intermittent stream. Prior to any vegetation removal, it is recommended that an assessment of any potential streams onsite be undertaken by a suitably qualified and experienced ecologist. If vegetation removal within 10m of a stream is proposed, this will trigger a regional consent under the Auckland Unitary Plan, Rule E15.4.1(A19) Vegetation alteration or removal within 10m of urban streams as a restricted discretionary activity. Appropriate assessment and management would be required.*			The proposed advice note on the stream assessment is not agreed. There are any number of potential regional plan level resource consents that may be required following detailed design and the Minister does not favour listing all such potential occurrences as advice notes on the designation. This will be determined at the design phase. If the OLFP is determined to be an intermittent stream and requiring any modification or riparian vegetation removal, this can be addressed in the outline plan for that stage of work and any regional resource consent that may be triggered (the designation will not remove the need for any regional resource consents).
Healthy Waters – suggested changes to designation conditions			

Suggested changes to the proposed conditions (as included in Form 18), insertions are shown as *underlined* and deletions are shown as a ~~*strikethrough*~~. 'Black text' indicates the same / no change proposed. ***1. Outline Plans*** *That an outline plan of works or outline plan waiver shall not be required for:* *a) Any internal building works other than those that result in a net increase in the number of classrooms or classroom equivalents;* *b) General building maintenance and repair work including but not limited to repainting, re-cladding and re-roofing;* *c) Installing, modifying and removing playground furniture and sports structures (e.g. goal posts);* *d) Amending any internal pedestrian circulation routes/pathways;* *e) Installing, maintaining or repairing any in ground infrastructure services such as stormwater, sewerage and water lines and connections, including any ancillary earthworks. For stormwater this applies to works that do not result in an increase in new impervious site area, new or changes to stormwater discharge location or capacity, or alterations to overland flow paths,* *f) Provision of landscaping and gardens, provided that it does not conflict with any designation condition or alter landscaping required as mitigation as part of an outline plan for other works; or*	The amendment to (e) is unnecessary and is not agreed. Its intent is to ensure an outline plan is not needed for physical infrastructure in the ground. Matters relating to run off from impervious surfaces, or new or changed discharges will be subject to existing or new regional consents as relevant so does not need double handling via an outline plan. The current clause does not remove any obligations to consider changes to overland flow where relevant (i.e. outline plans require a consideration of changes to site contours). The Stormwater infrastructure suggested condition is agreed in part to ensure there is a mechanism to secure the recommended flood management approach for this site is implemented. This should be a standalone condition rather than part of the condition relating to circumstances where an outline plan is not required. At the time of development, all infrastructure will be designed using best engineering practice and in accordance with Council standards and guidelines. Auckland Council (including Healthy Waters) will also have the opportunity to review the design and provide comments at the OPW stage and as such specific condition is not considered to be required in this context. Attenuation to 80% pre-development flows should be limited to impervious surfaces. Future development of the site may include areas where works will be carried out to create completely pervious surfaces such as sports fields. In such case attenuation to 80% pre-development flows would not be considered appropriate. Updated condition below (standalone condition): ~~*All stormwater infrastructure related plans must be prepared in consultation with Auckland Council Healthy Waters and Flood Resilience Department.*~~ *The stormwater system for the Site must be designed and constructed such that post-development peak flows from ~~site~~ all new impervious surfaces do not exceed 80% of pre-development peak flows for the 1% AEP rainfall event, or as otherwise certified by Auckland Council.*

g) General site maintenance and repair work, or boundary fencing otherwise permitted by the Unitary Plan. *h) Any temporary or mobile facilities or structures (e.g. oral health clinic, life education class, emergency generator).* *i) Installation of solar panels.* ***0. Stormwater infrastructure*** *All stormwater infrastructure related plans must be prepared in consultation with Auckland Council Healthy Waters and Flood Resilience Department.* *The stormwater system for the site must be designed and constructed such that postdevelopment peak flows from the site do not exceed 80% of pre-development peak flows for the 1% AEP rainfall event.*	
Noise – recommendations to designation conditions	
The AEE has advised that the proposed designation for the new school will provide conditions to cover operational and construction noise. It is noted that proposed condition 2 will address the school's operational noise and is consistent with the AUP noise standards for school operation, which is acceptable. • However as the school site is surrounded by residential zones and future urban zone under the AUP, no rural zoned site is adjacent to the proposed school site, and as such the condition should be amended by adding "future urban" zone (see wording highlighted in red below). *2. Noise* *The noise (rating) level arising from the operation of the school must comply with the following noise levels when measured within the boundary of any residentially zoned site, or within the notional boundary of any site in any rural or Future Urban zone:*	Addition of reference to the FUZ in the condition is agreed

Time	Noise level
Monday to Saturday 7am to 10pm	55dB L_{Aeq}
Sunday 9am to 6pm	
All other times	45 dB L_{Aeq} 75 dB L_{AFmax}

These noise limits do not apply to noise from school sports and school recreational activities occurring between 8am and 6pm Monday to Saturday.

Noise levels shall be measured and assessed in accordance with NZS 6801:2008 "Measurement of Environmental Sound" and NZS 6802:2008 "Environmental Noise".

Noise from construction shall not exceed the limits recommended in, and shall be measured in accordance with, New Zealand Standards NZS 6803:1999 "Acoustics – Construction Noise".

Additionally the Standard Conditions for All Education Designations do not include any construction noise condition, which should be included in the designation conditions.

From: [redacted]
To: Chris Khouri; [redacted]
Cc: [redacted]
Subject: RE: Kumeū Secondary School NoR Lodgement - Minister of Education
Date: Wednesday, 18 March 2026 9:59:47 am
Attachments: image006.png
image007.png
MoE Response to Further Info Request - Kumeū Secondary New Site - D002497.01.pdf
Kumeu Secondary School NOR RFI Response Transport 260313.pdf
20260217 Contaminated Land Kumeu Secondary RFI response.pdf

Good Morning Chris

Further to the request for further information dated 13 February 2026, please find attached the response from the Minister of Education.

We look forward to this matter now moving forward to notification.

Regards

Chris Horne
Director

INCITE

PO Box 3082
Auckland 1140

[redacted]
www.incite.co.nz

From: Chris Khouri <chris.khouri@aucklandcouncil.govt.nz>
Sent: Friday, 13 February 2026 11:54 am
To: Gemma Hayes <[redacted]>; Chris Horne <[redacted]>
Cc: Peter Vari <[redacted]>; Rod Aros Aravena <[redacted]>
Subject: RE: Kumeū Secondary School NoR Lodgement - Minister of Education

Mōrena Gemma,

Please find attached the s92 letter for this NoR.

Any queries, feel free to get in touch.

Kumeu Secondary School NOR - Transport

Response to Auckland Council and Auckland Transport Requests for Further Information

Prepared for	Ministry of Education; Incite
Project number	MED-J071
Revision	Final
Issue date	13 March 2026
Prepared by	Kate Brill, Associate Transportation Planner

1. Introduction

The purpose of this memo is to respond to transport matters raised by Auckland Council and Auckland Transport, in regard to the Notice of Requirement for a proposed Secondary school at 54 & 60 Station Road and 43 Trigg Road in Kumeu. The matters for discussion provided by Auckland Council are set out in blue italics, followed by Abley's response.

2. Response to RFIs

1. Please demonstrate that the mode share in Table 3 of the Integrated Transportation Assessment (ITA) derived from the average mode share for secondary schools in 2020 is appropriate for a secondary school in a location which has relatively limited access to public transport, and where active modes from the wider area that the school is anticipated to serve may be limited.

The 2020 modal share data provided in the ITA is a combination of Rural, Urban and Destination schools (i.e. no local catchment) so includes schools that are both serviced and not serviced by PT. The average is considered appropriate in light of the following information:

- The masterplan roll is unlikely to be reached for many years, at which time the proposed Rapid Transit Network may be implemented.
- The intersections that will be most impacted by the school are the two SH16 intersections i.e. Station Road and Trigg Road. The townships that will generate traffic through these intersections are the areas that have access to Public Transport. The two main townships in the school catchment area that do not have PT are Muriwai and Taupaki. School traffic coming from Muriwai and Taupaki are most likely to come from the south on Station Road or Trigg Road, and not travel through the SH16 intersections.

Figure 2.1 shows the current bus routes in relation to the catchment townships. The majority of the townships (Waimauku, Huapai, Kumeu and Riverhead) have a bus service.

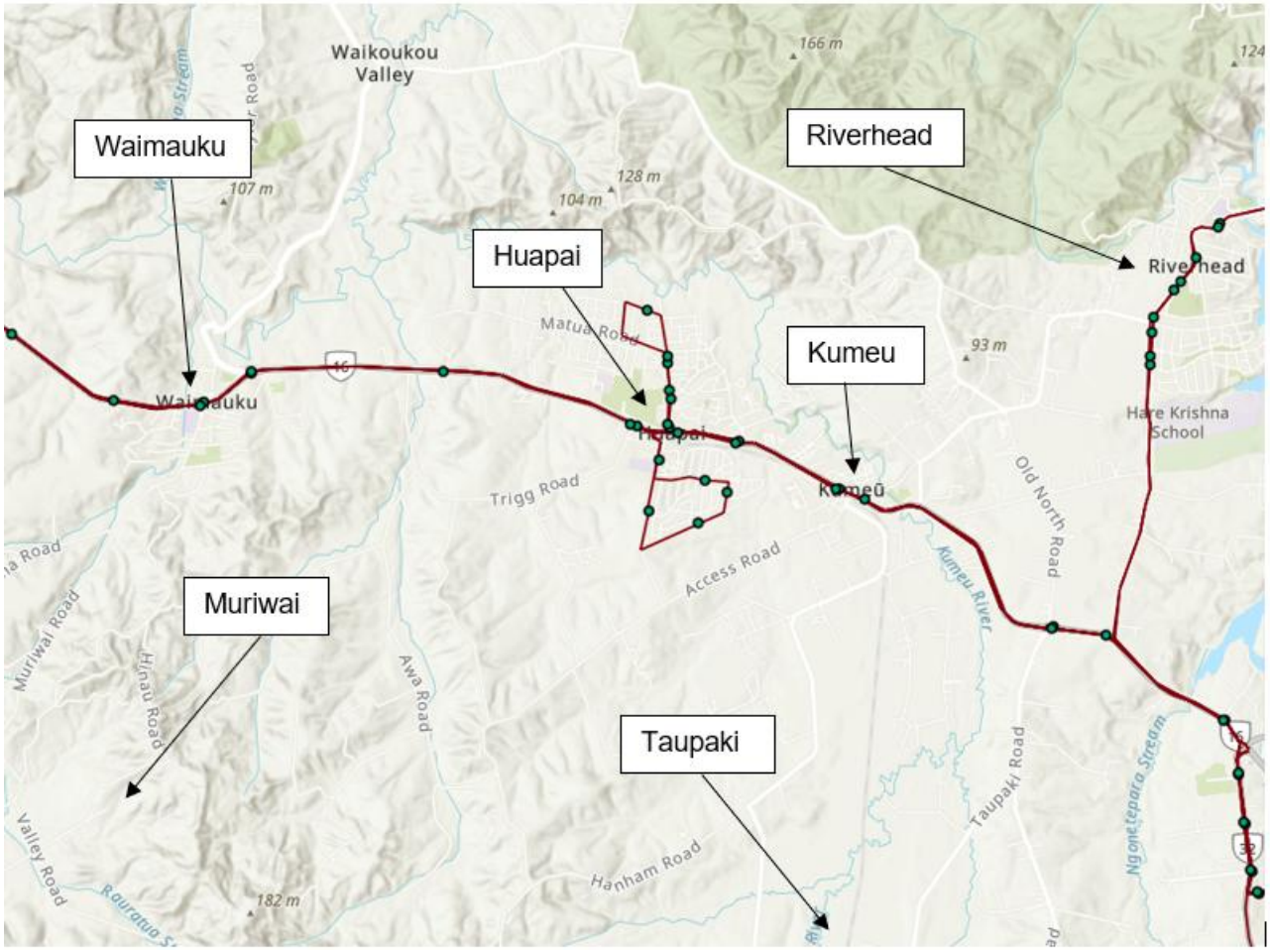


Figure 2.1 Bus Services in the indicative school catchment (Source: AT GIS Portal)

The two communities that are not serviced by public transport are Muriwai and Taupaki. Figure 2.2 and Figure 2.3 illustrate the optimal driving routes from Muriwai and Taupaki to the school, indicating that traffic from these towns is unlikely to use the SH16 intersections.

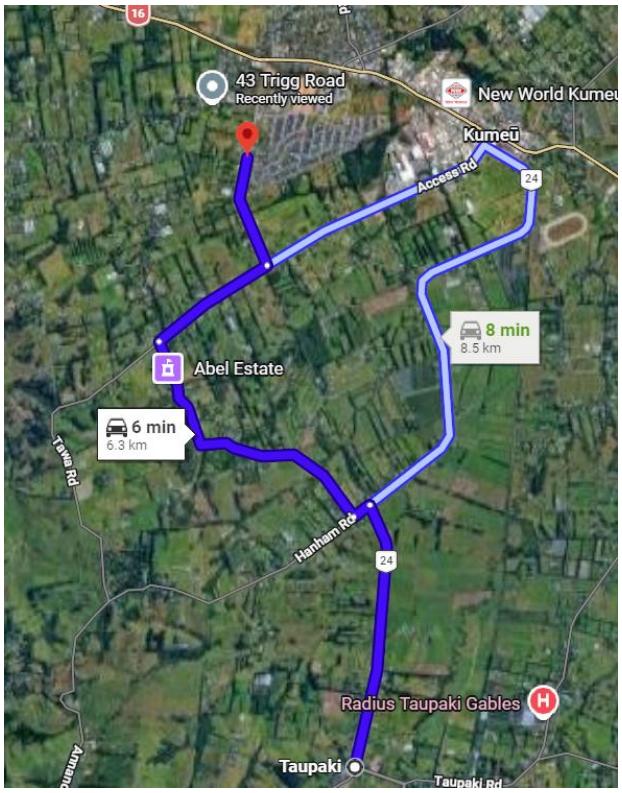


Figure 2.2 Vehicle route from Taupaki to school site

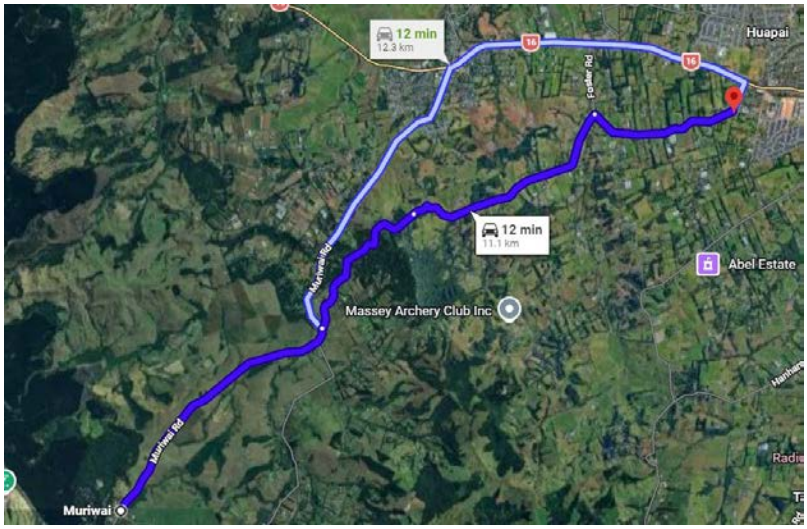


Figure 2.3 Vehicle route from Muriwai to school site

2. Please amend the public transport mode share to reflect similar school catchments with a urban / rural and small town mix, as requested by AT. Alternatively, further justify the application of a 30% public transport mode share to the proposal.

Please see the assessment from Item 1 which is also applicable here. We acknowledge that students coming from the two townships that do not have a bus service are likely to have a higher share of driving, however as discussed above, these townships (Muriwai and Taupaki) are unlikely to drive through the SH16 intersections most impacted by the school (Station Road and Trigg Road).

Furthermore, the masterplan roll of 2,500 students is unlikely to be reached for many years, at which point the public transport network is likely to look very different in the northwest, given the proposed PT projects in the medium term. Student roll will grow with development in the northwest, which will prompt the need for a PT network. Therefore, it is likely that a good public transport network will be in place when/if the school reaches the masterplan roll.

3. Please provide justification for the use of a vehicle occupancy mode share of 1.4 students per vehicle in the calculation of the trip generation (ITA Table 4).

NZTA Research Report 467 has an accompanying spreadsheet named the NZ Household Travel Survey – School Travel Model[1]. This documents states that the average student occupancy is 1.4 students per vehicle at Auckland **primary** schools. (In addition, Ableys undertook surveys, in recent years, at an Auckland Primary School, with the same result of an average of 1.4 students per vehicle). NZTA's School Travel Model has a slightly lower student occupancy of 1.26 students per vehicle for Auckland **Secondary** Schools, likely due to the shorter timeframe that high school students attend school. We understand the vehicle occupancy is a function of how many siblings are at the school during the same time period. Given the primary school is immediately next door to the secondary school (therefore spanning up to 13 years of school), the average student occupancy is expected to be significantly higher than 1.4 students. We therefore consider a student occupancy rate of 1.4 students used in the analysis to be conservative.

4. Please provide an assessment of the trip generation effects on the Station Road / Schoolside Road intersection, as requested by AT.

Turning movement counts were undertaken on 10 March and 11 March 2026 in the morning (8:00-8:30am) and afternoon (2:15-2:45pm) to capture the operation of the Station Road / Schoolside Road intersection outside of the peak PUDO time for Huapai Primary District School. These time periods were chosen because the Pick-Up and Drop-Off schedule for the secondary school will differ from that of the adjacent primary school.

A SIDRA model has been produced for both the morning and interpeak periods, with the results shown in Figure 2.4 and Figure 2.5. Both models operate at a Level of Service A on all movements.

There is expected to be a low number of school vehicles using the intersection, as the majority of students residing in the Huapai Triangle are well within walking distance to the school and not expected to be driven to school. Furthermore, there are three intersections from the Huapai Triangle linking onto Station Road, resulting in a good distribution of traffic. There may be some school traffic from the proposed secondary school that could use Schoolside Road for PUDO, however this is expected to be low given the generous PUDO opportunities closer to the school such as Station Road, Trigg Road and potentially an on-site PUDO.

The following observations were made during the survey:

- Construction traffic is currently using Schoolside Road for a large construction project on Station Road, increasing the typical traffic using this intersection.
- Some traffic was linked to the Primary School during the time periods covered by the survey.
- There was no more than one vehicle waiting to exit Schoolside Road, for the majority of the survey period i.e. no queues were observed.

Schoolside Road is not a through route and has no high traffic generating activities. The future operation of the Schoolside Road / Station Road is expected to continue to operate at a high level of service without the need for mitigation.

[1] https://www.nzta.govt.nz/resources/research/reports/467

MOVEMENT SUMMARY

Site: [1] Station Rd / Schoolside Rd AM (Folder1)
Output produced by SIDRA INTERSECTION Version: 10.0.6.236

New Site
Site Category: (None)
Give-Way (Two-Way)
Site Scenario: 1 | Local Volumes

Vehicle Movement Performance

Mov ID	Turn	Mov Class	Demand Flows [Total veh/h	HV] %	Arrival Flows [Total veh/h	HV] %	Deg. Satn v/c	Aver. Delay sec	Level of Service	95% Back Of Queue [Veh. veh	Dist] m	Prop. Qued	Eff. Stop Rate	Number of Cycles to Depart	Aver. Speed km/h
South: Station Road South															
2	T1	All MCs	21	0.0	21	0.0	0.019	0.2	LOS A	0.1	0.5	0.19	0.25	0.19	48.4
3	R2	All MCs	13	0.0	13	0.0	0.019	5.0	LOS A	0.1	0.5	0.19	0.25	0.19	47.0
Approach			34	0.0	34	0.0	0.019	2.0	NA	0.1	0.5	0.19	0.25	0.19	47.8
East: Schoolside Road															
4	L2	All MCs	27	0.0	27	0.0	0.118	4.7	LOS A	0.4	3.0	0.19	0.54	0.19	45.5
6	R2	All MCs	116	0.0	116	0.0	0.118	5.1	LOS A	0.4	3.0	0.19	0.54	0.19	45.3
Approach			143	0.0	143	0.0	0.118	5.0	LOS A	0.4	3.0	0.19	0.54	0.19	45.4
North: Station Road North															
7	L2	All MCs	99	0.0	99	0.0	0.079	4.6	LOS A	0.0	0.0	0.00	0.36	0.00	46.8
8	T1	All MCs	51	0.0	51	0.0	0.079	0.0	LOS A	0.0	0.0	0.00	0.36	0.00	48.0
Approach			149	0.0	149	0.0	0.079	3.0	NA	0.0	0.0	0.00	0.36	0.00	47.2
All Vehicles			326	0.0	326	0.0	0.118	3.8	NA	0.4	3.0	0.10	0.42	0.10	46.5

Figure 2.4 SIDRA Outputs for Station Rd / Schoolside Rd intersection - AM

MOVEMENT SUMMARY

Site: [1 (2)] Station Rd / Schoolside Rd PM (Folder1)
Output produced by SIDRA INTERSECTION Version: 10.0.6.236

New Site
Site Category: (None)
Give-Way (Two-Way)
Site Scenario: 1 | Local Volumes

Vehicle Movement Performance

Mov ID	Turn	Mov Class	Demand Flows [Total veh/h	HV] %	Arrival Flows [Total veh/h	HV] %	Deg. Satn v/c	Aver. Delay sec	Level of Service	95% Back Of Queue [Veh. veh	Dist] m	Prop. Qued	Eff. Stop Rate	Number of Cycles to Depart	Aver. Speed km/h
South: Station Road South															
2	T1	All MCs	21	0.0	21	0.0	0.039	0.4	LOS A	0.2	1.2	0.24	0.39	0.24	47.4
3	R2	All MCs	44	0.0	44	0.0	0.039	5.0	LOS A	0.2	1.2	0.24	0.39	0.24	46.1
Approach			65	0.0	65	0.0	0.039	3.5	NA	0.2	1.2	0.24	0.39	0.24	46.5
East: Schoolside Road															
4	L2	All MCs	15	0.0	15	0.0	0.062	4.7	LOS A	0.2	1.5	0.18	0.53	0.18	45.6
6	R2	All MCs	59	0.0	59	0.0	0.062	5.1	LOS A	0.2	1.5	0.18	0.53	0.18	45.4
Approach			74	0.0	74	0.0	0.062	5.0	LOS A	0.2	1.5	0.18	0.53	0.18	45.4
North: Station Road North															
7	L2	All MCs	95	0.0	95	0.0	0.073	4.6	LOS A	0.0	0.0	0.00	0.37	0.00	46.8
8	T1	All MCs	42	0.0	42	0.0	0.073	0.0	LOS A	0.0	0.0	0.00	0.37	0.00	47.9
Approach			137	0.0	137	0.0	0.073	3.2	NA	0.0	0.0	0.00	0.37	0.00	47.1
All Vehicles			276	0.0	276	0.0	0.073	3.7	NA	0.2	1.5	0.11	0.42	0.11	46.5

Figure 2.5 SIDRA Outputs for Station Rd / Schoolside Rd intersection - Interpeak afternoon

5. Please provide SIDRA model layout drawings and modelled traffic signal phasing (where appropriate) for the three intersections modelled.

Please see Appendix A.

6. Please provide traffic modelling output without the proposed school traffic of the SH16 / Station Road and SH16 / Trigg Road intersections.

Please see Appendix A.

7. Please provide evidence that the traffic modelling of the SH16 / Station Road and the SH16/Trigg Road intersections is calibrated against existing traffic conditions (e.g. queue lengths and delays).

Queue surveys / observations have been undertaken at all three intersections, including the following movements:

- Station Road / SH16 – Queue lengths on all three approaches
- Trigg Road / SH16 – Trigg Road approach
- Station Road / Schoolside Road intersection – Schoolside Road approach

Delay surveys at the intersections is not considered appropriate at any of three intersections. There was very minimal delay at both SH16 / Trigg Road and Station Road / Schoolside Road intersections. Any queued vehicles using the signalised intersection at SH16 / Station Road intersection cleared on the green phase, on every approach.

The SIDRA outputs for all three intersections reflect the queue lengths observed on-site, which is reflected in Table 2.1.

Table 2.1 Summary of queue lengths surveyed vs SIDRA output

Intersection Approach	95th percentile queue – Surveyed / Observed	95th percentile queue – SIDRA Output
SH16 / Station Road – South Approach	AM – 3 vehs PM – 3 vehs	AM – 2.8 vehs PM – 2.6 vehs
SH16 / Station Road – West Approach Through movement	AM – 7 vehs PM – 5 vehs	AM – 8.8 vehs PM – 5 vehs
SH16 / Station Road – West Approach Right Turn	AM – 1 veh PM – 1 veh	AM – 0.5 veh PM – 1.1 veh
SH16 / Station Road – East Approach	AM – 7 vehs PM – 9 vehs	AM – 5.4 vehs PM – 10 vehs
SH16 / Trigg Road – South Approach	AM – 1 veh PM – 1 veh	AM – 2.8 vehs PM – 2.6 vehs
Station Road / Schoolside Road – East Approach	AM – 1 veh PM – 1 veh	AM – 0.2 vehs PM – 0.1 vehs

8. Please provide data that supports the distribution of school related traffic presented in Figure 13 of the Integrated Transportation Assessment (ITA).

The Trip Distribution exercise was based on the following steps:

1. The number of dwellings from each township was calculated from Geomaps via the spatial analysis tool. This step provided a percentage of students expected to come from each community, as shown in Figure 2.6.

Township	Approx no. of dwellings	Percentage based on dwellings/area
Riverhead	1300	25%
Waimauku	420	8%
Taupaki	580	11%
Muriwai	285	6%
Huapai	1472	29%
Huapai SHA	800	16%
Kumeu	280	5%
Totals	5137	100%

Figure 2.6 Percentage of students residing in indicative catchment areas[2].

2. The direction of travel from each of the townships was assessed using Google Maps route finder. An example of this is provided in Figure 2.2 and Figure 2.3 for the optimum route from Muriwai / Taupaki to the school. The direction of travel then informed the number of vehicles turning left / right at the SH16 / Station Road and SH16 / Trigg Road intersections for the SIDRA analysis, as per Figure 2.7.

Direction of Travel
Riverhead – arrive from east on SH16
Waimauku – arrive from west on SH16
Taupaki – arrive from the south (no travel on SH16)
Muriwai – arrive from the south (no travel on SH16)
Huapai – arrive from east on SH16
Huapai Triangle SHA – no travel on SH16/key intersections
Kumeu – arrive from east on SH16

Figure 2.7 Direction of travel from catchment areas

9. Please confirm whether school students would be provided car parking within the school site.

Covered by MOE.

10. Further to item 9 above, please provide an assessment of the effects of student parking on the surrounding road network, including Pick Up Drop Off (PUDO) activity for the Huapai District School and the proposed school, if student parking is proposed to be on-street.

All of the housing on Trigg Road, and in the residential streets on the eastern side of Station Road have ample on-site parking, with most having a double garage with stacked car parks in front of the garage. Observation surveys during school hours recorded low parking occupancy within the residential streets.

A School Travel Plan will clearly inform families that students who drive to school are not encouraged to park on or near the school's road frontages. This will likely include a map showing a distance of say 100m from the Huapai Primary School and the Secondary school site on both Trigg Road and Station Road where parking by students (or staff) is discouraged. This will encourage students to park further afield and not use the on-street car parks currently utilised by Huapai District School for PUDO activity. In the event that student parking becomes an issue, there are mitigation measures such as parking restrictions on the school frontage that can be implemented.

[2] The number of residential homes in the commercial area of Kumeu is relatively low (i.e.5% in Figure 2.6). The new residential developments surrounding the school are considered Huapai in our assessment.

11. Please provide details of what on-site car parking provision will be provided for staff and visitors.

Covered by Incite / MOE.

12. Please provide an assessment of the operation of the PUDO that demonstrates that there is sufficient capacity within the PUDO to accommodate the forecast traffic. The assessment should consider the different characteristics of the AM and PM peak PUDO operation, noting that caregivers often arrive early to wait for students. The assessment should also take into account the existing PUDO activity for the Huapai District School if there are overlaps between the activities in terms of location and/or time. Please also refer to item 13 below.

The primary and secondary school PUDO activities are not expected to overlap, allowing each school to use all available on-street parking and reducing congestion outside the school gate. Caregivers often arrive at primary schools ahead of time to ensure their young children are not left waiting outside alone. This concern is less common with secondary schools, as older students are generally more independent. Consideration should be given to the operation of PUDO when deciding on school finish times for each of the schools e.g. the PUDO operation is likely to operate more effectively if the secondary school finishes the school day after the primary school.

It is unknown what PUDO facility will be provided at this early stage as this will be decided at OPW. See response to Item 13.

13. Please provide an assessment of the operation of an on-site PUDO facility, taking into account the effects of forecast queue lengths for vehicles exiting an on-site facility, which would impede movements into and along the PUDO.

The SIDRA model provided in the ITA for the school access conservatively assumed that all PUDO activity would occur on-site, whereas in reality it is likely that PUDO will also occur on-street at the numerous car parks on Station Road and Trigg Road. The access model presented a LOS A-B for the access overall showing minimal delay to vehicles on the road network.

The site frontage along Station Road measures approximately 210 meters, while the internal accessway that connects Station Road to Trigg Road is 330 meters in length. As a result, there is anticipated to be sufficient space on-site to accommodate any vehicle queues from departures at the PUDO, thereby preventing any queuing from extending onto the road network. Measures outlined in the School Travel Plan, including clear guidance and communication, will help ensure that on road queuing is not permitted.

If an on-site PUDO is proposed at OPW stage, a full assessment of capacity and potential queuing will be undertaken as part of the Establishment OPW Transport Assessment.

14. Please provide more information about the PUDO operation to demonstrate that such facilities can be accommodated without adversely affecting the safety and efficiency of the adjoining transport network for all modes. Note that AT does not support the suggestion that PUDO could be accommodated on the adjacent public roads.

See response to Item 13.

15. Please provide details as to how vehicles dropping off and picking up students on-street on Trigg Road and Station Road will be able to turn around safely and efficiently.

It is anticipated that a PUDO may be provided on-site which will accommodate the turning movements needed for entering and exiting the site. However, there will inevitably be PUDO activity on Trigg Road and Station Road. Not all vehicles will need to turn around as a number of vehicles will be continuing their journey to work / study. The remaining vehicles that do not use an on-site PUDO and need to turn around to make their return journey will need to find a safe place to turn around or drive around the block. The School Travel Plan can communicate / educate caregivers on safe driving behaviour outside the school gate in the event that there are safety issues.

16. Please provide details as to how there will be certainty that the recommended transport infrastructure in Section 7 of the ITA will be assessed and implemented as part of the future Outline Plan of Works (OPW).

Covered by Incite.

17. Please demonstrate that it is feasible to provide a pedestrian crossing on Station Road along the site frontage and that vehicle crossings for a PUDO can be provided safely (including demonstrating that there is sufficient visibility at the vehicle crossing(s)).

Visibility at Existing vehicle crossing for school site

A Visibility Assessment has been provided in Section 5.3 of the ITA which shows that the sight distance at access points on both Station Road and Trigg Road exceed Austroads requirements for visibility. Figure 2.8 to Figure 2.11 show good visibility from both existing accesses.

Figure 2.8 Existing school access on Station Road, looking north

Figure 2.9 Existing school access on Station Road, looking south

Figure 2.10 Existing school access on Trigg Road, looking north

Figure 2.11 Existing school access on Trigg Road, looking south

Potential location for new pedestrian crossing on Station Road

There are several points along the Station Road frontage where a pedestrian crossing can be provided. A potential location for a new pedestrian crossing is approximately 130m from the northern boundary of the site, near the top of the small crest in the road. This location allows at least 180m of visibility in each direction as seen in Figure 2.12 and Figure 2.13. However, the location of a new pedestrian crossing

will be determined at OPW stage when other factors such as the location of the school pedestrian entrance will be confirmed.

Figure 2.12 Potential location for new pedestrian crossing on Station Road, looking north

Figure 2.13 Potential location for new pedestrian crossing on Station Road, looking south

Potential location for PUDO Entry and Exit points on Station Road.

In the event that an on-site PUDO is provided on the Station Road frontage, it is expected that the entry will be provided near the southern end of the site and an exit towards the northern end of the site frontage. Figure 2.14 to Figure 2.16 show appropriate visibility at the northern and southern ends of the site frontage, all of which meet Austroads visibility requirements.

Figure 2.14 Potential location for a PUDO Entry at the southern end of the site frontage on Station Road

Figure 2.15 Potential location for a PUDO Exit at the northern end of the site frontage on Station Road, looking north

Figure 2.16 Potential location for a PUDO Exit at the northern end of the site frontage on Station Road, looking south

18. Please provide details of what measures will be provided to enable buses to serve the proposed school given there are no bus stops on the western side of Station Road for northbound buses.

As seen in Figure 2.17, Bus Route 123 does a loop from Station Road – Nobilo Road – Schoolside Road. Students catching the bus in the afternoon can use the bus stops on the eastern side of Station Road before the bus loops around the residential streets. There are two bus stops for use by school students, one approximately 130m to the north and a second bus stop 110m to the south.

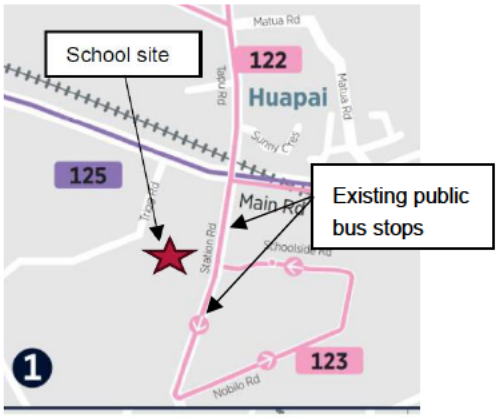


Figure 2.17 Bus route 123 doing a loop around Huapai SHA Triangle

19. Please provide further information, such as an indicative school bus network and expected number of buses, showing how rural townships within the school catchment can be serviced by school buses, as requested by AT.

Dedicated school buses are not proposed for the high school at this stage. This may change at later planning stages.

20. Please provide more information to show how access for all modes can be provided to the proposed school and how the effects of such access on the safe and efficient operation of the surrounding transport network can be mitigated, as requested by AT. In particular, AT seeks further information about the following:

⇒ how the existing formed accesses from Station Road and Trigg Road to the existing primary school would be upgraded to accommodate access to the proposed school and;

⇒ turning treatments, vehicle tracking and sightlines at access points.

This level of detail will be provided at OPW stage. Sightlines at access points are provided in the ITA and in Item 17 of this memo.

Recommendations (Non-S92 matters)

A1. The ITA (sections 3.2 and 7) suggest that AT should be requested to provide additional Route 123 buses at school start and finish times. The 123 bus route is an hourly service. AT notes that this route would only be useful for school pupils living at the west end of Kumeū, which is a small residential catchment. The number of pupils likely to use the service may not warrant additional services during off-peak times. If students use the 122 or 125 bus routes, AT has concerns about student safety. There is no pedestrian crossing across SH16 for students to safely access eastbound bus services

There are three options for students to safely cross SH16 to access eastbound bus services, as seen in Figure 2.18. The closest option is the new pedestrian refuge recently built on SH16, just east of Trigg Road. This option is a 550m walk with uninterrupted footpaths from the school to the eastbound bus stop.

The second option is the underpass under SH16 immediately east of the Station Road / SH16 intersection, which is approximately 700m from the school to the eastbound bus stop. The third option

is utilising the new rail overbridge which leads to a signalised crossing on SH16 - this is approximately 1.2km walk from the school.

Route 123 would be a useful bus route for all students living east of the school, including linking up with a bus route from Riverhead.

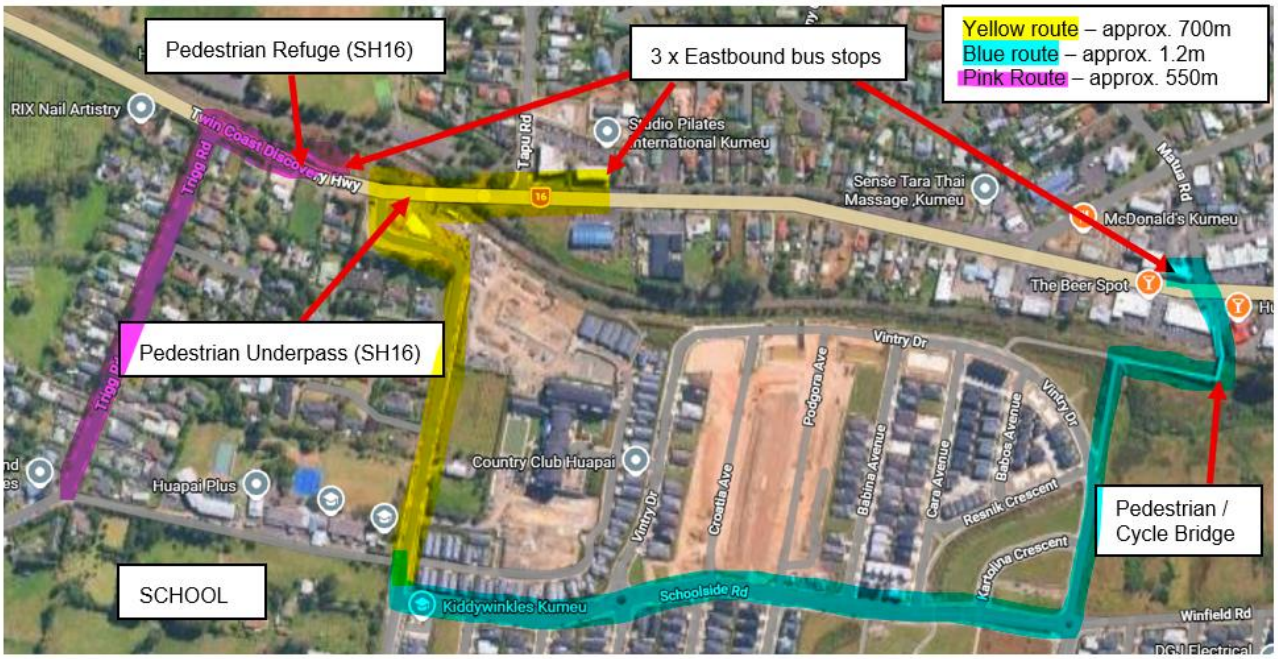


Figure 2.18 Walking routes to eastbound bus services

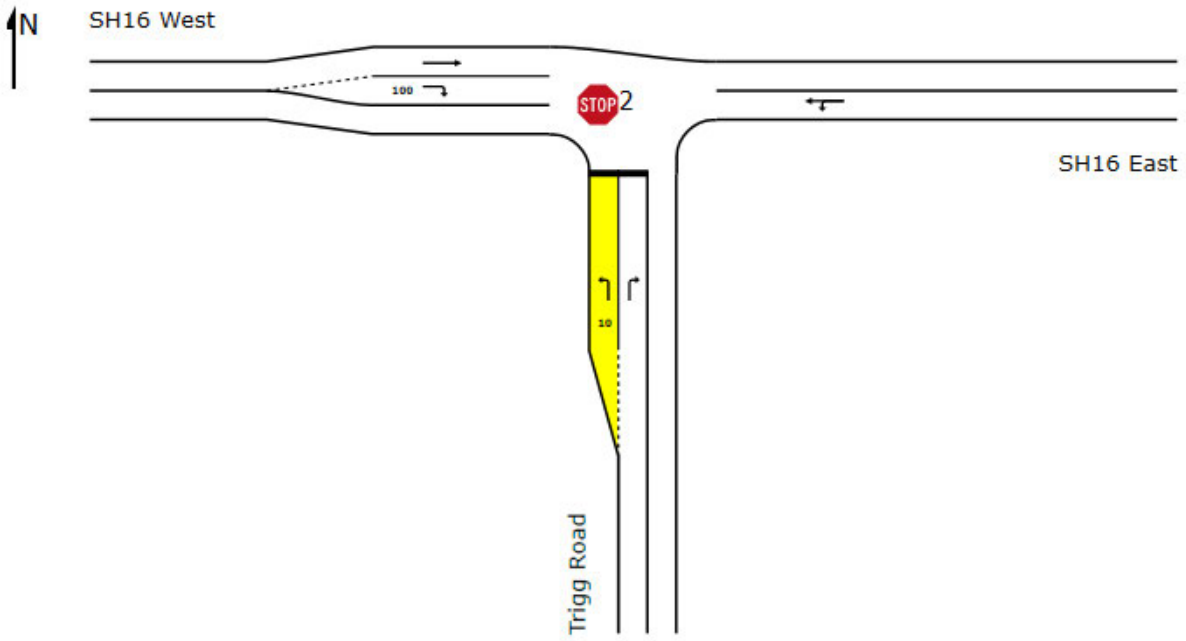
The remaining of the Advisory comments (A2 – A8) are covered by Incite/MOE.

Appendix A.
SIDRA Outputs

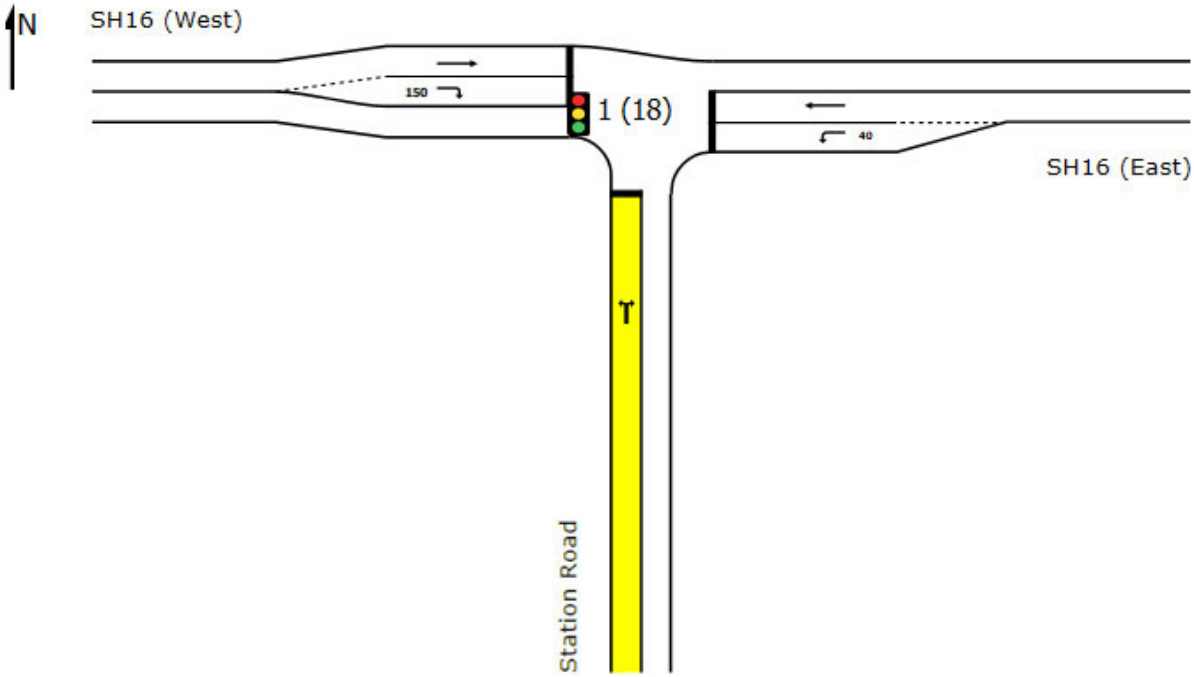
A1. SIDRA Outputs

5. Please provide SIDRA model layout drawings and modelled traffic signal phasing (where appropriate) for the three intersections modelled.

A1.1 SIDRA model layout for SH16 / Trigg Road Intersection



A1.2 SIDRA model layout & Phasing Summary for SH16 / Station Road Intersection



PHASING SUMMARY

Site: [1 (18)] SH16 / Station Rd_school AM Peak 8AM-8.30AM BASE MODEL (SH16_Station Rd)
Output produced by SIDRA INTERSECTION Version: 10.0.6.236

New Site
Site Category: (None)
Signals - EQUISAT (Fixed-Time/SCATS) Isolated Cycle Time = 50.0 seconds (Site Optimum Cycle Time - Minimum Delay)
Site Scenario: 1 | Local Volumes

Timings based on settings in the Site Phasing & Timing dialog
Phase Times determined by the program
Phase Sequence: Four-Phase Leading Right Turns
Input Phase Sequence: A, C, D
Output Phase Sequence: A, C, D
Reference Phase: Phase A

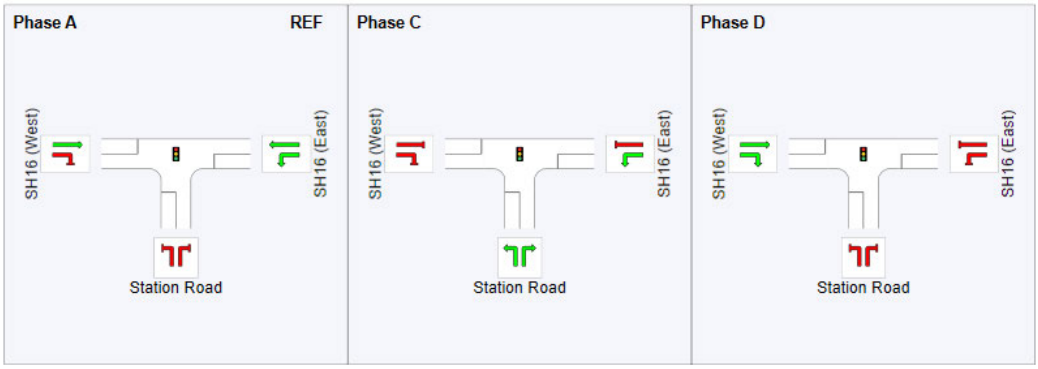
Phase Timing Summary

Phase	A	C	D
Phase Change Time (sec)	0.0	31.6	42.3
Green Time (sec)	29.6	5.7	2.9
Phase Time (sec)	34.6	10.5	5.0
Phase Split	69%	21%	10%
Phase Frequency (%)	100.0	95.0 [4]	41.0 [4]

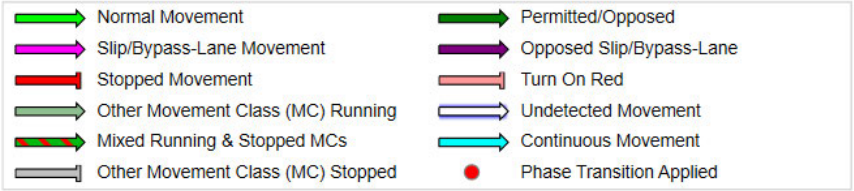
See the Timing Analysis report for more detailed information including input values of Yellow Time and All-Red Time, and information on any adjustments to Intergreen Time, Phase Time and Green Time values in cases of Pedestrian Actuation, Minor Phase Actuation and Phase Frequency values (user-specified or implied) less than 100%.

4 Phase Frequency specified by the user (phase times not specified).

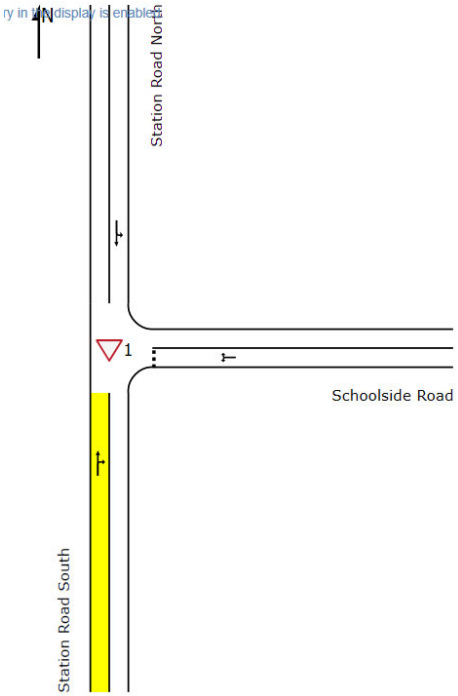
Output Phase Sequence



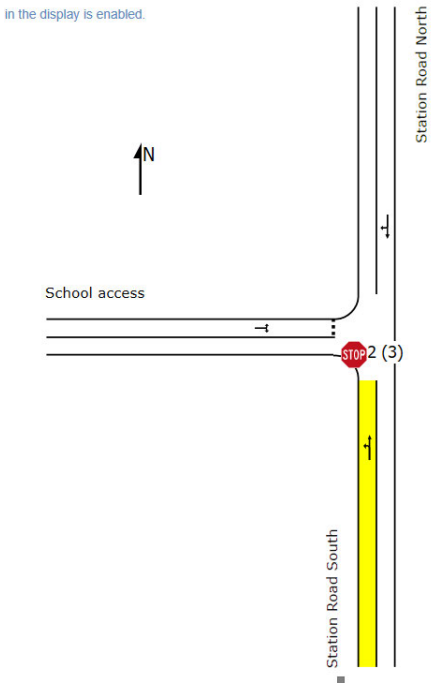
REF: Reference Phase
VAR: Variable Phase



A1.3 SIDRA model layout for Station Road / Schoolside Road Intersection



A1.4 SIDRA model layout for Station Road / School Access



6. Please provide traffic modelling output without the proposed school traffic of the SH16 / Station Road and SH16 / Trigg Road intersections.

A1.5 SIDRA Outputs SH16 / Station Road BASE MODEL – AM

MOVEMENT SUMMARY

Site: [1 (18)] SH16 / Station Rd_school AM Peak 8AM-8.30AM BASE MODEL (SH16_Station Rd)
Output produced by SIDRA INTERSECTION Version: 10.0.6.236

New Site
Site Category: (None)
Signals - EQUISAT (Fixed-Time/SCATS) Isolated Cycle Time = 50.0 seconds (Site Optimum Cycle Time - Minimum Delay)
Site Scenario: 1 | Local Volumes

Vehicle Movement Performance

Mov ID	Turn	Mov Class	Demand Flows [Total veh/h	HV] %	Arrival Flows [Total veh/h	HV] %	Deg. Satn v/c	Aver. Delay sec	Level of Service	95% Back Of Queue [Veh. veh	Dist] m	Prop. Qued	Eff. Stop Rate	Number of Cycles to Depart	Aver. Speed km/h
South: Station Road															
1	L2	All MCs	52	2.0	52	2.0	0.494	29.0	LOS C	2.6	18.4	0.98	0.77	0.98	35.1
3	R2	All MCs	52	2.0	52	2.0	*0.494	29.0	LOS C	2.6	18.4	0.98	0.77	0.98	35.1
Approach			103	2.0	103	2.0	0.494	29.0	LOS C	2.6	18.4	0.98	0.77	0.98	35.1
East: SH16 (East)															
4	L2	All MCs	108	2.0	108	2.0	0.077	6.1	LOS A	0.7	4.6	0.26	0.60	0.26	45.1
5	T1	All MCs	421	5.0	421	5.0	0.377	5.8	LOS A	5.4	39.8	0.56	0.49	0.56	46.3
Approach			529	4.4	529	4.4	0.377	5.9	LOS A	5.4	39.8	0.50	0.51	0.50	46.0
West: SH16 (West)															
11	T1	All MCs	718	5.0	718	5.0	*0.550	4.2	LOS A	8.8	64.3	0.54	0.48	0.54	47.3
12	R2	All MCs	40	2.0	40	2.0	0.377	32.4	LOS C	1.1	7.6	1.00	0.72	1.00	33.9
Approach			758	4.8	758	4.8	0.550	5.7	LOS A	8.8	64.3	0.56	0.50	0.56	46.3
All Vehicles			1391	4.5	1391	4.5	0.550	7.5	LOS A	8.8	64.3	0.57	0.52	0.57	45.1

A1.6 SIDRA Outputs SH16 / Station Road BASE MODEL – Interpeak (Afternoon)

MOVEMENT SUMMARY

Site: [1 (17)] SH16 / Station Rd_school PM Peak 2.15-2.45PM BASE MODEL (SH16_Station Rd)
Output produced by SIDRA INTERSECTION Version: 10.0.6.236

New Site
Site Category: (None)
Signals - EQUISAT (Fixed-Time/SCATS) Isolated Cycle Time = 60.0 seconds (Site Optimum Cycle Time - Minimum Delay)
Site Scenario: 1 | Local Volumes

Vehicle Movement Performance

Mov ID	Turn	Mov Class	Demand Flows [Total veh/h	HV] %	Arrival Flows [Total veh/h	HV] %	Deg. Satn v/c	Aver. Delay sec	Level of Service	95% Back Of Queue [Veh. veh	Dist] m	Prop. Qued	Eff. Stop Rate	Number of Cycles to Depart	Aver. Speed km/h
South: Station Road															
1	L2	All MCs	23	2.0	23	2.0	0.527	35.0	LOS C	2.8	20.1	0.99	0.78	1.02	33.2
3	R2	All MCs	69	2.0	69	2.0	*0.527	35.0	LOS C	2.8	20.1	0.99	0.78	1.02	33.2
Approach			93	2.0	93	2.0	0.527	35.0	LOS C	2.8	20.1	0.99	0.78	1.02	33.2
East: SH16 (East)															
4	L2	All MCs	53	2.0	53	2.0	0.035	5.9	LOS A	0.3	2.1	0.20	0.58	0.20	45.3
5	T1	All MCs	661	5.0	661	5.0	*0.527	5.7	LOS A	10.0	72.8	0.55	0.50	0.55	46.5
Approach			714	4.8	714	4.8	0.527	5.7	LOS A	10.0	72.8	0.53	0.50	0.53	46.3
West: SH16 (West)															
11	T1	All MCs	491	5.0	491	5.0	0.350	2.9	LOS A	5.0	36.5	0.37	0.33	0.37	48.1
12	R2	All MCs	16	2.0	16	2.0	*0.210	38.6	LOS D	0.5	3.6	0.99	0.68	0.99	32.0
Approach			506	4.9	506	4.9	0.350	4.0	LOS A	5.0	36.5	0.39	0.34	0.39	47.3
All Vehicles			1313	4.6	1313	4.6	0.527	7.1	LOS A	10.0	72.8	0.51	0.46	0.51	45.4

A1.7 SIDRA Outputs SH16 / Trigg Road BASE MODEL – AM

MOVEMENT SUMMARY

Site: [2] SH16 / Trigg Road AM 8-8.30am (SH16_Trigg Road)
Output produced by SIDRA INTERSECTION Version: 10.0.6.236

New Site
Site Category: (None)
Stop (Two-Way)
Site Scenario: 1 | Local Volumes

Vehicle Movement Performance

Mov ID	Turn	Mov Class	Demand Flows [Total veh/h	HV] %	Arrival Flows [Total veh/h	HV] %	Deg. Satn v/c	Aver. Delay sec	Level of Service	95% Back Of Queue [Veh. veh	Dist] m	Prop. Qued	Eff. Stop Rate	Number of Cycles to Depart	Aver. Speed km/h
South: Trigg Road															
1	L2	All MCs	4	0.0	4	0.0	0.004	9.2	LOS A	0.0	0.1	0.48	0.80	0.48	44.0
3	R2	All MCs	39	0.0	39	0.0	0.062	11.9	LOS B	0.2	1.5	0.70	1.00	0.70	42.5
Approach			43	0.0	43	0.0	0.062	11.7	LOS B	0.2	1.5	0.68	0.98	0.68	42.6
East: SH16 East															
4	L2	All MCs	27	0.0	27	0.0	0.267	4.6	LOS A	0.0	0.0	0.00	0.03	0.00	48.5
5	T1	All MCs	477	5.1	477	5.1	0.267	0.1	LOS A	0.0	0.0	0.00	0.03	0.00	49.7
Approach			504	4.8	504	4.8	0.267	0.3	NA	0.0	0.0	0.00	0.03	0.00	49.6
West: SH16 West															
11	T1	All MCs	737	5.0	737	5.0	0.390	0.2	LOS A	0.0	0.0	0.00	0.00	0.00	49.8
12	R2	All MCs	5	0.0	5	0.0	0.005	6.4	LOS A	0.0	0.1	0.50	0.57	0.50	44.8
Approach			742	5.0	742	5.0	0.390	0.2	NA	0.0	0.1	0.00	0.00	0.00	49.7
All Vehicles			1289	4.7	1289	4.7	0.390	0.6	NA	0.2	1.5	0.02	0.05	0.02	49.4

A1.8 SIDRA Outputs SH16 / Trigg Road BASE MODEL – Interpeak (Afternoon)

MOVEMENT SUMMARY

Site: [2 (6)] SH16 / Trigg Road PM 2.15-2.45pm (SH16_Trigg Road)
Output produced by SIDRA INTERSECTION Version: 10.0.6.236

New Site
Site Category: (None)
Stop (Two-Way)
Site Scenario: 1 | Local Volumes

Vehicle Movement Performance

Mov ID	Turn	Mov Class	Demand Flows [Total veh/h	HV] %	Arrival Flows [Total veh/h	HV] %	Deg. Satn v/c	Aver. Delay sec	Level of Service	95% Back Of Queue [Veh. veh	Dist] m	Prop. Qued	Eff. Stop Rate	Number of Cycles to Depart	Aver. Speed km/h
South: Trigg Road															
1	L2	All MCs	3	0.0	3	0.0	0.005	11.5	LOS B	0.0	0.1	0.62	0.83	0.62	42.9
3	R2	All MCs	22	0.0	22	0.0	0.043	13.3	LOS B	0.1	1.0	0.75	1.00	0.75	41.9
Approach			25	0.0	25	0.0	0.043	13.0	LOS B	0.1	1.0	0.73	0.98	0.73	42.0
East: SH16 East															
4	L2	All MCs	56	0.0	56	0.0	0.447	4.7	LOS A	0.0	0.0	0.00	0.04	0.00	48.3
5	T1	All MCs	788	4.9	788	4.9	0.447	0.2	LOS A	0.0	0.0	0.00	0.04	0.00	49.5
Approach			844	4.6	844	4.6	0.447	0.5	NA	0.0	0.0	0.00	0.04	0.00	49.4
West: SH16 West															
11	T1	All MCs	562	5.1	562	5.1	0.298	0.1	LOS A	0.0	0.0	0.00	0.00	0.00	49.9
12	R2	All MCs	7	0.0	7	0.0	0.012	9.3	LOS A	0.0	0.3	0.66	0.73	0.66	43.3
Approach			569	5.0	569	5.0	0.298	0.2	NA	0.0	0.3	0.01	0.01	0.01	49.8
All Vehicles			1439	4.7	1439	4.7	0.447	0.6	NA	0.1	1.0	0.02	0.04	0.02	49.4

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Ministry of Education
Attn: Gemma Hayes

Via email
[redacted]

17 February 2026

Kumeu Secondary School: Contamination RFI Response

WWLA has recently prepared a Preliminary Site Investigation (PSI)[1] and Interim Site Management Plan (SMP)[2] to support the Notice of Requirement (NoR) for a proposed new Secondary School at Station Road and Trigg Road, Kumeu.

A Request for Further Information (RFI) was received on 13 February 2026, and Question 26 relates to soil contamination:

26. Please provide a Detailed Site Investigation.

Our response is as follows:

The PSI confirmed the site was in parts in use for horticultural activities, prior to the 1980s. Soil sampling (a Detailed Site Investigation or DSI) will be required to confirm actual contamination concentrations and the potential risks to human health and/ or the environment as part of the resource consent application. The NoR does not replace the need for consent under the National Environmental Standards (such as the NESCS[3]) or Chapter E30 of the Auckland Unitary Plan (AUP).

As set out in the PSI, contaminants are most likely to be diffusely distributed in topsoil and given at least 40 years has lapsed since horticultural activities ceased, it is highly unlikely that pesticide residues will remain at concentrations that present an unacceptable risk to human health. Any asbestos or lead contamination present will likely be localised around buildings.

A proposed sampling plan to be implemented as part of a DSI for resource consent was provided in the PSI and interim SMP. Any contamination that may be present can be managed with standard earthworks controls and targeted remediation (if required) and does not present a constraint to designation of the land for the purpose of a school.

If you have any further questions, please do not hesitate to contact the undersigned.

Yours sincerely,

Lauren Windross
Senior Contaminated Land Specialist |
[redacted] | www.wwla.kiwi

[1] WWLA, 10 December 2025. Kumeu Secondary School, Preliminary Site Investigation (Ground Contamination). Prepared for Ministry of Education. WWLA ref 1683, Rev 1.

[2] WWLA, 10 December 2025. Kumeu Secondary School, 51-60 Trigg Road, Kumeu. Interim Site Management Plan (Ground Contamination). Prepared for Ministry of Education. WWLA ref 1683, Rev 1.

[3] National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health Regulations, 2011 (NESCS)