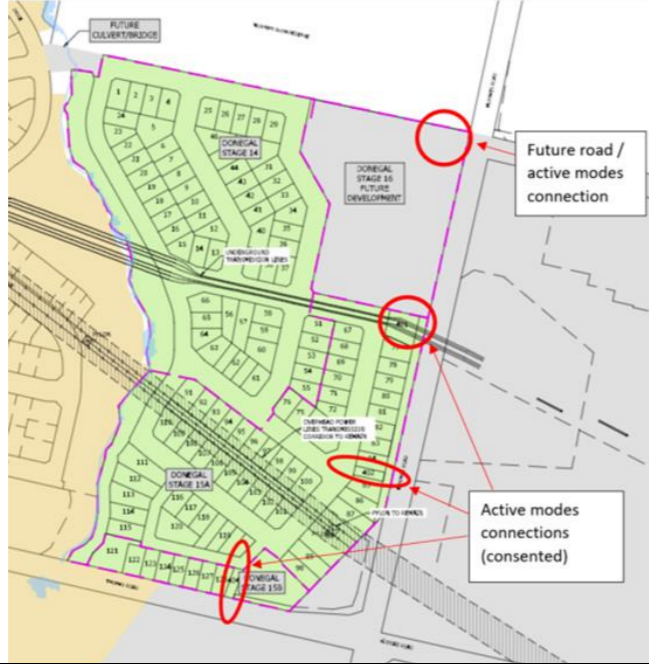


Change Appendix 13 – Feedback from Auckland Transport and Auckland Council

Topic	Information Requested	MOE Comment
<i>AUCKLAND TRANSPORT</i>		
Transport	Auckland Transport have recently received confirmation that Waka Kotahi will be the agency progressing the upgrades to Murphy’s Road. Auckland Transport are seeking further clarification from Waka Kotahi on these points and have sought to include them in the above-mentioned meeting to discuss this and include them in the discussions relating to transport matters and effects pertaining to the proposed school.	Noted. At the meeting on 7 December, representatives from Waka Kotahi identified there remain no firm updates on the scale, scope or delivery date of upgrades to Murphys Road. Best case, with the work being undertaken on a business case currently, there could be physical works occurring in 2025 but again, that is an estimate, with no detail available on the scope of works intended, and no clear direction from the Minister to pursue designs.
	Appendix A of the ITA provides responses to AT’s previous feedback however the responses are not considered to adequately address the issues to ATs satisfaction and further assessment and amendments are required.	The Ministry’s consultants do not consider this is an accurate reflection of the work completed and provide further clarification on this below.
	AT has significant concerns regarding the form, function, and transport effects of the proposed Pick Up Drop Off (PUDO) operations on Road 3 and Picturesque Drive. Auckland Transport considers that the effects associated with pick up and drop off trips should be accommodated as far as is practicable within the school site. Auckland Transport requests that further work is done to assess the impacts on the road network should the remote PUDO (Picturesque Drive) not be utilised. Bad weather is likely to render the operation of this facility unattractive, particularly given the 450m walking distance between the remote PUDO and the school entrance, therefore modelling should reflect all PUDO vehicle trips utilising the main PUDO.	We note that the approx. 16 PUDO spaces shown in the Feasibility Study are on-site, not on road 3. The ITA provides further response, noting that some level of reliance on the remote PUDO is appropriate, particularly considering AT’s own modal share suggestion of Travelwise schools. Nonetheless, the ITA includes further sensitivity testing, as set out.
	The low level of integration for active modes within the schools catchment area (all access for active modes will need to arrive via Murphy’s Park Drive which has a poor level of service) is problematic. Provision of an active mode connection from the school site across the stream to the east of the school site to Picturesque Drive is essential for creating a walkable neighbourhood. This will also improve the attractiveness of the proposed remote PUDO and would reduce the walking distance from the remote PUDO to the school entrance from 450m to approximately 120m.	<p>The Ministry has investigated a stream crossing, and received a quantity surveyor estimate of \$2m. This is not considered to be a scale of mitigation commensurate with the transport effects of this school proposal, specifically considering the crossing would only be reducing a 450m walk. The ITA explains how the remote PUDO can be implemented and the proposed designation conditions address this expectation including through use of a travel plan, that the school must continue to operate.</p> <p>We note that AT’s own community travel aspirations promotes park and walk. This is an example of promoting that alternative mode of transport from the inception of the school. A longer walk as proposed is also a health benefit for school children.</p> <p>It is not clear why AT considers that Murphys Park Drive has a poor level of service, noting the ITA identifies it has wide footpaths for the length that school children will walk it from Picturesque Drive to the walkway within 125 Murphys Road, along the stream.</p>
	Auckland Transport is concerned with the proposed left out exit from within the school (on-site) PUDO on to Murphy’s Road and would like more detail as there is considered to be insufficient information available within the ITA to determine if the proposal is efficient, effective and safe. Murphy’s Road as currently formed has a constrained width and implementation of a left turn out accessway is challenging. Restricting left in access is also considered challenging. To enable further assessment the sight distance assessment needs to include a plan, if vertical restrictions exist, this should be illustrated with either site photos or longitudinal profile. The proposal as presented	The ITA responds to this query. We note the importance of recognising this is a Notice of Requirement application and at this stage the level of detail sought is not available. The ITA has demonstrated that a left out access can be feasibly provided, including in consideration of the existing condition of Murphys Road, and that this option does not require any significant on-road mitigation beyond a physical barrier to prevent right-turns out of the school site, and potentially some localised

Topic	Information Requested	MOE Comment
	<p>raises serious safety concerns and further assessment is needed. However, the preference is that this option is not pursued as the provision of a separate access onto Murphy's Road from the school is not supported by AT. Consideration of an alternative where the PUDO exit is at or just east of Road 1 intersection should be made, this would enable alternative routes out of the school PUDO.</p>	<p>pavement widening. Further, the proposed designation conditions ensure this left-out access can be designed and certified in consultation with AT.</p> <p>It is noted that sight distance analysis has already been provided in the ITA that AT reviewed. Further, the Design Feasibility plan already includes an exit out of the PUDO on-site onto Road 3.</p>
	<p>Consideration should also be given to the formation of an intersection to connect Road 3 and Murphy's Road which would bring the additional benefit of providing a safe crossing between the development area to the west of Murphys Road and the school. However, the key reason for this request is that it is anticipated that the Murphy's Park Drive intersection with Murphy's Road will fail without that connection or in the alternative, a Hodges Road to Thomas Road connection with an intersection formed on Murphy's Road.</p>	<p>This matter was discussed in the meeting on 7 December where it was agreed that a crossing would be problematic from a safety perspective because of the hidden queue issue arising from the existing crest on Murphys Road.</p> <p>The ITA clarifies that the proposal is not adding any additional traffic to the intersection of Murphys Park Drive / Murphys Road. Rather, the traffic that diverts to the school is either already on the network or is not heading through this intersection. Pressure on this intersection is therefore not an effect that arises from this proposal and it is not appropriate to seek to implement a signalised intersection here to alleviate existing network issues.</p> <p>Further, we note that the request for extensive network connections is contrary to earlier discussions with AT about being pragmatic about the lack of connections on the network here and that not becoming the Ministry's responsibility as the last cab off the rank so to speak.</p>
	<p>The alteration works proposed on Road 3 should be limited to those that pertain to the car park entries/exits. Blocking the median at Road 2 intersection is not acceptable, the ability to right turn from Road 2 to Road 3 needs to be retained. The PUDO entry may need to be moved further east, so that approach is via the turn-around at the east end of road 3. In addition the staff car park access could also be moved further east. There may also be benefit to considering an alternative PUDO placement as its location at the school door creates a conflict for pedestrian/active modes users who will have to cross PUDO circulation.</p>	<p>The ITA confirms the proposed changes to Road 3 would be satisfactory from the Ministry's perspective. Proffered amendments were to alleviate queues and could be pushed to OPW stage. The location of on-site PUDO in the Design Feasibility Study has already taken account of pedestrian separation and safety. Other details are more appropriately addressed at OPW stage.</p>
	<p>A further assessment of the effects of the below scenarios should be provided:</p> <ol style="list-style-type: none"> 1. not providing the left-out access on to Murphy's Road; 2. a significantly lower utilisation of the remote PUDO; and 3. a combination of 1) and 2) above. 	<p>This was discussed at the meeting on 7 December. The ITA confirms it is not realistic to model without an access onto Murphys Road. However, the ITA does undertake a sensitivity test of a reduction in reliance on the remote PUDO to align with the 14% modal share anticipated by AT in its Travelwise data. It is noted that the designation conditions and travel plan in particular should be viewed as an opportunity to effect this outcome, rather than seek to undertake modelling now that sees the school failing in its responsibilities for use of the remote PUDO.</p>
	<p>AT requests that modelling be undertaken to demonstrate impact on the intersection of Murphy's Park Drive and Murphy's Road and the local road network serving the school based on the above scenarios.</p>	
<p>AT considers these questions previously asked remain unanswered</p>	<ul style="list-style-type: none"> • Auckland Transport acknowledges the need for the school to meet demands arising from population growth and intensification in the Flat Bush area. The subject site shows promise as a location for a school. That said the site is not without some significant challenges. General feedback from AT is that there is a need to consider the wider program of upgrades for Murphys Road as part of the New Zealand Upgrade Programme. This is a key road that is off significant importance for the proposed school. At the time of writing road design detail is not yet available. 	<p>Noted. Refer above re Waka Kotahi's update.</p>

Topic	Information Requested	MOE Comment
	<ul style="list-style-type: none"> • The ITA should reference the upgrade for Murphys Road, including walking and cycling paths. Noting in particular: <ul style="list-style-type: none"> ○ includes vertical alignment modification to deal with the abrupt summit near the site. ○ LILLO intersection and signalised crossing need safe visibility. ○ Design speed will be affected by the design and timing of MPD and Thomas Rd intersection safety upgrades. 	<p>No details of upgrade available. All we can confirm at this stage is the safety of the proposed left out access, which has been completed and provided in the ITA.</p>
	<ul style="list-style-type: none"> • Notwithstanding the ‘indicative’ catchment zone identified in the strategy, Auckland Transport understand that it would still be possible for students residing West of Murphys road to be entered onto the school roll. No analysis of the existing school rolls in the area has been provided, it is not clear to Auckland Transport how MoE envisions restricting entrants on to the Flat Bush School role from the West of Murphys road or why, other than to avoid addressing the need for a safe connection across Murphys road, this would be desirable. 	<p>Recognising that the ITA has been drafted on the assumption that the student catchment will be bordered by Murphys Road to the west, the Ministry proposes a condition on the designation that requires further assessment of transport matters before any construction works occur on the site that arise from changes to the student catchment that result in students travelling from beyond Murphys Road to the west. This outcome is not the intention given the catchments of existing schools in the area and the common practice of arterial (or similar) roads forming the boundary to a school’s student catchment. However, it is acknowledged that further assessment should be undertaken regarding transport (and pedestrian) safety and efficiency before enabling a change to the enrolment scheme in that regard. The mechanism for restricting entrants to the new school roll is wholly within the Ministry’s capability and can be comfortably relied upon by the Council and AT.</p>
	<ul style="list-style-type: none"> • Assessment should detail the walking catchment for the school and assess the adequacy of infrastructure including the area immediately west of Murphys road. There is insufficient commentary around walking and cycling (and wheeling), planning for vulnerable road users needs to be prioritised. Walking and cycling should be considered as the principal mode of access within the school catchment and the requisite infrastructure to enable this needs to be identified. 	<p>This is already addressed in the ITA.</p>
	<ul style="list-style-type: none"> • The stream crossing from Picturesque Drive will mitigate private vehicle trip generation and contribute to a reduction in emissions, this should link the cycle facility on the other side of the stream promoting school access by active mode and increasing the viability of the proposed remote PUDO. 	<p>As above.</p>
	<ul style="list-style-type: none"> • ITA should pick up on discussion between MoE and AC Parks regarding an esplanade path continuing South and West from the SE corner of #12 esplanade path through to Murphys Road. This has been planned in the RC and EA for BUN60397121. 	<p>This request is not clear. It is assumed that the walkway shown running through 125 Murphys Road will be constructed and vested for public access along the stream, and forms part of the remote PUDO walking school bus route.</p>

Topic	Information Requested	MOE Comment
	<ul style="list-style-type: none"> The provision of a new school on the subject site will be a significant draw for residents west of Murphys Drive given the travel distance to existing schools. As such a signalised crossing of Murphys Road to connect with Donegal path network must be provided. 	<p>Refer response to above re student catchment and proposed condition.</p>
	<ul style="list-style-type: none"> The east end of the road being constructed by #125 must be reconfigured to form a forward turn head (11 m radius). This end of the road will become effectively PUDO. 	<p>This is already addressed by the ITA and proposed designation conditions.</p>
	<ul style="list-style-type: none"> Any PUDO access onto the school grounds must be located so that direct and safe access by children on foot or bike is not put in conflict with cars, priority should be given to vulnerable users. 	<p>This is already addressed by the ITA and Design Feasibility Study.</p>
	<ul style="list-style-type: none"> Circulation and manoeuvring needs to be carefully scrutinised for both the remote and on site PUDO locations. The remote PUDO is located on a residential road. Detail of expected number of users at each PUDO needs to be provided. Note that Auckland Transport questions the viability of the remote PUDO to attract users away from the on site PUDO given: <ul style="list-style-type: none"> Likelihood of onward journeys that utilise Murphys Road (particularly if direct access on to Murphys Road is provided for Walking distance to school if stream crossing is not provided for. 	<p>Detail on manoeuvring within either PUDO area will be provided at OPW stage.</p> <p>The ITA addresses the travel plan expectations and further elaborates on these matters.</p>
	<ul style="list-style-type: none"> Picturesque Drive is not built to accommodate a remote PUDO and will require upgrades, adding in parking and footpaths. As noted above the stream crossing from Picturesque Drive is critical for this to be attractive. 	<p>This is already addressed in the ITA regarding on-road improvements required – being limited to a footpath extension and new parking bay(s).</p> <p>We do not accept that the stream crossing is critical for the remote PUDO to be attractive. Refer ITA and travel plan designation condition.</p>
	<ul style="list-style-type: none"> Consider potential of Picturesque Drive to be connected through to Hodges Road to the south on its future East West alignment. 	<p>Picturesque Drive already connects to Hodges Road but only for active modes – this is already addressed in the ITA.</p>
	<ul style="list-style-type: none"> Need to demonstrate how the school can be served by busses, although too small for a school bus, there will be school trips etc. that present a need for bus access to be designed for. 	<p>This is already addressed in the ITA.</p>

Topic	Information Requested	MOE Comment
	<ul style="list-style-type: none"> Auckland Transport has concerns about the feasibility of a one way PUDO operation, it may prompt u turning on Murphys road, please consider option of access back on to road 3. 	This is addressed above and already addressed in the ITA.
	<ul style="list-style-type: none"> The feasibility of the LILO has not been assessed in detail at this stage. 	The feasibility of the left out crossing has been assessed to the level of detail appropriate for Notice of Requirement stage. Refer establishment OPW designation condition. Specifically, the ITA confirms in-principle feasibility in respect of safety etc.
	<ul style="list-style-type: none"> There is need to better understand the network to the east and south, in particular the potential future Hodges Road and how access will operate in the interim and once the network is complete. 	This is already addressed in the ITA.
AUCKLAND COUNCIL		
Archaeology	<p>I've had a quick read, it all seems to be there. As it is not scheduled we don't have many controls. I'd actually say it's a 1890s place just on the window hook form alone, plus other details suggest the same.</p> <p>In any case, I agree with the recommendations – archaeology will give us more information and ideally a built heritage person would push for removal and/or re-use of the house, elsewhere or on this site or nearby.</p> <p>A better outcome for the new community here would be for it to be converted into a childcare centre (like Lomb's Hotel in Panmure) or even a café (like the mentioned Bremner cottage in McQuoids Rd). Adaptively reusing old structures (especially if they've already been gutted internally) provides new communities with an immediate sense of focus and builds that "sense of place", so important for such extensive new builds. As this is in the pre-app phase, there is a chance to suggest this?</p>	The Ministry does not intend to re-use the structure, noting the likely inefficiencies of doing so relative to the educational purpose of the designation. The Ministry will adopt the recommendations of the Archaeological Report provided, namely recording the structure prior to demolition. Further investigations may be possible to determine whether it can be relocated but this is not a commitment at this stage.
Shape files	Shapefiles are required for the GIS team.	There is not considered to be any requirement for shape files, noting that the only map provided is Appendix 2 Designation Plan which simply outlines the existing legal boundaries of Lot 3 DP 515396 as already recorded in Council's Geomaps.
Word version documents	The one drive link works well for us, however it would also be appreciated if you could provide us with word copies of reports too	Word documents of the AEE, Form 18, and this Appendix have been provided.
Transport - general	You have requested a gap-analysis of the provided information with the aim of avoiding or reducing requests for information once the Notice is lodged. I have also provided some preliminary comments on merits and potential effects that I hope may be of assistance to the Ministry.	Noted.
Transport – vehicle access	<p>From the Council GIS LIDAR contour information, it appears the apex of the crest curve is less than 10m south of the south end of the site's road frontage, and it appears that sightlines from the southern end of the site frontage might extend over the crest and meet SISD requirements. That would suggest a superior location for vehicle access, respecting the current form of Murphys Road, would be at the south end of the frontage. If the sight distances from the southern end of the proposed site frontage did not meet the minimum requirements, extending the designation to the southwest (including the derelict former dwelling) should allow a fully compliant access providing for all movements. It is noted that entry movements are likely to warrant auxiliary lanes to be added to Murphys Road.</p> <p><i>The assessment of sight distances should be based on measured operating speeds, or alternately on estimated speeds 15% higher than the posted speed limit, and the grade of the road (estimated from GIS LIDAR contours to be around 7%). I recommend sight distances measured at the southern end of the road frontage be provided.</i></p>	<p>It is not appropriate to suggest that the designation can simply "extend to the south-west" incorporating other property. The designation site is limited to the lot boundaries as illustrated.</p> <p>This feedback appears to be contradictory to requests from AT, which were further discussed at the meeting on 7 December and it was agreed that any crossing or intersection here may result in unmitigated safety effects including a hidden queue given the crest on Murphys Road.</p> <p>The proposal does not anticipate all movements, and specifically looks to exclude right turns onto or from an arterial road.</p> <p>The ITA further addresses this query.</p>

Topic	Information Requested	MOE Comment
	<p>The prohibition of right turn exit movements is unlikely to be fully effective and it is likely that the driveway would generate some U-turn movements to the south, potentially at the Thomas Road intersection.</p> <p><i>I recommend an assessment of the changes required to Murphys Road to support the installation of a median island, such as road widening, street lighting, changes to road markings be provided; and an assessment of the effects of the proposed median island on other users of the road, including from drivers U-turning south of the site.</i></p>	<p>We consider this is OPW level detail and further, that there should not be an expectation that we design for unlawful manoeuvres.</p>
<p>Transport – rat-running</p>	<p>The combination of the entry from Road 3 and the exit onto Murphy Road provides for vehicles to travel through the site. That route is likely to be highly attractive to many drivers that could otherwise be subject to delay turning out of Murphys Park Drive onto Murphys Road, particularly in the a.m. peak period, and it is highly likely that “rat-run” traffic through the school site would be problematic and difficult for the school to manage.</p> <p>The ITA provides no information on the level of delay that is currently experienced at the Murphys Drive/ Murphys Drive intersection, or at any other location, to assist in estimating the potential for rat-run traffic through the school. Rat-run traffic has the potential to generate adverse outcomes for residents and other users of the proposed local roads to the north (Roads 1 to 3).</p> <p>Given these issues it is recommended the Ministry consider relocating any vehicle access on Murphys Road to the southern end of the frontage where suitable sight distances are available. If access is not to be relocated the ITA should explain why this location would not be feasible. It is also recommended that consideration be given to not providing a link for vehicles to pass through the site.</p> <p>Alternately, it is recommended that the Ministry consider not providing any access (vehicular or pedestrian) on Murphys Road to avoid the road safety issues associated with any access on that frontage.</p> <p><i>An assessment of the propensity for drivers to use the through-site link as a rat-run should be provided, including information on the delays experienced at the Murphys Road/ Murphys Park Road intersection in the a.m. peak period, and ways in which that may be avoided or managed.</i></p>	<p>The Ministry does not accept that motorists will attempt to ratrun through the on-site PUDO at times it is operating. This can be actively managed regardless. Outside pick and drop off times, the on-site PUDO can be secured to avoid any ability for ratrunning. The Murphys Road exit could also be gated.</p> <p>The ITA relies on data from earlier reports in the area relative to delays at the Murphys Road / Murphys Park Drive intersection and further addresses this point.</p>
<p>Transport – roads in 125 Murphys Road</p>	<p><i>I recommended additional information be provided including the possibility that other sites fronting Road 3 may use it for vehicle access, or that Road 3 may be extended in future. Dimensions of the proposed median island in Road 3 and carriageway widths along with design details of Roads 1 to 3 be provided. The ITA should demonstrate that large vehicles could negotiate Roads 1 to 3 including the turns in and out of the school site. An assessment of the suitability of Roads 1 to 3 to provide the primary vehicular access to a school, and the effect of the additional traffic on that environment should be included.</i></p>	<p>Some of this is detail for OPW level. The on-road improvements on Road 3 Roads have to allow for access for 10.3m rubbish truck, therefore would be able to accommodate school vehicles, including buses. Bus access can be further detailed at OPW stage.</p> <p>The ITA already addresses effects on Roads 1 to 3. Carriageways are 6m wide so allow for 2 way traffic. As set out in the ITA, the expectation is that Roads 1 and 2 will operate largely like a one-way system for school, with access down one road and egress back to Murphys Park Drive via the other.</p>
<p>Transport – pedestrian access and PUDO</p>	<p>We note Auckland Transport is of the view that a pedestrian crossing facility on Murphys Road is required. The response to that comment in the ITA states that the poor sight distance at the crest would result in queues at the crossing being hidden, precluding such a crossing. We note that a crossing provided at or near the crest is unlikely to have that problem.</p> <p>Part of the school catchment described in the ITA includes land zoned Residential- Mixed Housing Suburban. The implementation of changes to zoning rules required by central government are expected to increase the number of dwellings provided in those areas. The ITA provides an estimate of the number of dwellings likely to be provided in the catchment calculated by the Ministry, and states it is higher than the zoning anticipated, but it is not clear if the estimated</p>	<p>The receiving environment is currently the existing MHU zone and Precinct. We agree that ultimately the MDRS will be implemented but the Plan Changes does not currently include this area given the Precinct. Further, the MDRS do not have legal effect currently in this location.</p> <p>The ITA explains the Ministry’s assumptions regarding growth projections and anticipated numbers of school age children.</p>

Topic	Information Requested	MOE Comment
	<p>number of dwellings reflects the forthcoming change to the AUP. This is relevant to the estimation of the future traffic volumes provided in the ITA.</p> <p><i>I recommend the basis for the estimated number of dwellings be clarified, including if the estimate accounts for the expected enabling of additional dwelling density.</i></p>	
Transport – Murphys Road	<p>As noted above, it is likely that some children will be dropped off and picked up on Murphys Road as the school has an access point on that frontage. If there is a pedestrian connection between Murphys Road and Road 3 that behaviour could occur regardless of the school having an access on Murphys Road. It is recommended that this behaviour be provided for rather than attempting to dissuade it from occurring.</p>	<p>That activity would be unsafe until Waka Kotahi complete their upgrade of Murphys Road more comprehensively than is required/ related to this school proposal. There is no intent to provide pedestrian access e.g. a school gate from Murphys Road. A site-specific designation condition is also proposed to further discourage this measure, noting the travel plan condition will enable ongoing education of the school community regarding appropriate and safe means of accessing the school.</p>
Transport – Picturesque Drive Remote PUDO	<p>The proposed is stated to be a 450m walk from the school and attract 25% of all vehicle traffic. The ITA explains that a school travel plan would ensure a high uptake of remote PUDO use and the provision of a Walking School Bus (WSB).</p> <p>The ITA assumes there would be little demand for the parking bays on the western side of Picturesque Drive, however, in similar residential areas the demand for on-street parking can be very high. Insufficient information is provided to support the ITA assertion in relation to parking demand.</p> <p>Based on the information supplied, the assumed level of use of this remote facility is not credible. I understand some schools can struggle to recruit sufficient volunteers to maintain a WSB at all times. A WSB would presumably wait at the remote PUDO and then leave for the school at a set time. Children that arrive late at the remote PUDO are likely to then walk to school unsupervised or to be driven to the main PUDO.</p> <p><i>I recommend data supporting the assumed low demand for on-street parking in the area be provided and data to support the assumed proportion of children that would use this PUDO in preference to another location in the area such as the on-site PUDO or Road 2. I recommend sensitivity testing with lower use of the remote PUDO be included.</i></p>	<p>The proposal will introduce additional parking bays therefore will not adversely impact use of on-street parking.</p> <p>Refer ITA regarding additional sensitivity testing of traffic model with lower use of remote PUDO.</p>
Transport – other	<p>The walking distance between the school and the neighbourhoods to the east, including the remote PUDO, could be significantly reduced by providing an active mode crossing of the watercourse east of the school. That would support the use of non-car transport modes and reduce car dependency.</p> <p>The on-site PUDO facility is proposed to have 16 spaces. No information is given about the adequacy of that number of spaces to serve the expected demand, or the likely queuing and delay that may be experienced within the site and the local streets to the north. The number of parking spaces proposed to be provided in Picturesque Drive is not stated. It is known that PUDO areas experience higher parking demand in the after-school period and the adequacy of the PUDO areas to accommodate that demand, the possible extent of any PUDO over-spill parking, and any potential effects generated by the parking (and/ or queuing) have not been included.</p> <p><i>Data should be provided to demonstrate the likely performance of the PUDO areas in the after-school period, and the effects of over-spill parking and traffic movements, including U-turn movements to access parking.</i></p>	<p>As above re stream crossing.</p> <p>The Feasibility Study is not detailed design. At OPW stage, an assessment can be undertaken regarding parking demand and supply relative to the proposed designation condition and operational needs.</p> <p>The ITA provides further explanation regarding peak morning parking demand. Afternoon peak is harder to model but it is anticipated that at OPW stage the required PUDO can be determined.</p>
Transport – Assessment review	<p><i>Recent actual traffic volumes on Murphys Road and Murphys Park Drive in the before-school and after-school hours should be provided.</i></p>	<p>The ITA provides a response to this matter noting that the catchment is not built out so there will still need to be further assumptions on growth, and further, the Ministry confirms that the school will not be increasing traffic through that intersection.</p>
	<p><i>Data to support the assumed trip rate, or modified analysis using a higher trip rate, and sensitivity testing of assumptions such as trip distribution, or alternative data such as output from regional transport models to inform the expected future traffic volumes should be provided.</i></p>	<p>The ITA provides a response to this matter, noting all regional models available had assumed the Mill Rd corridor upgrade completion.</p>

Flat Bush – Pre-Lodgement Feedback from Auckland Council and Auckland Transport

Topic	Information Requested	MOE Comment
	<i>I recommend data be provided to support the assumed car mode share values and the trip generation rates.</i>	The ITA confirms it uses AT's travelwise data.
	<i>I recommend the results of sensitivity testing of the assumptions used, and some analysis of the after-school period be provided.</i>	The ITA only provided the model for the morning period because traffic on network will be less in the afternoon as the school and commuter traffic peaks do not coincide. Morning peak therefore the worst-case. The travel plan designation condition is expected to manage the after school PUDO period.
Infrastructure and flood report	Trent has indicated that the information provided is suitable to inform assessment of the effects of the proposed activity and associated NoR.	No further response or action required.
Contaminated land	Marcus asks whether the previous contamination reports referenced in T & T's reports [Focus (2016), Babingtons (2021) and desktop investigation by T & T (2021) will be available for review at some stage? Otherwise, his comments all relate to work needed further down the line at resource consent stage	No further response or action required. The T&T assessment stands on its own and the historic reports referred to are pre-purchase reports for due diligence and therefore not intended to be provided.
Terrestrial ecology	Millie has queries around the ability to review the various statutory documents including the NPS, RPS and district plan policies without the AEE. I assume you will identify these at least at a list level and/or have a conversation with your ecologist about these policies at some stage? It is useful to discuss these and address the NoR tests briefly. This will then address how the aims of these documents can/will be achieved through this designation in terms of the sensitive environments outlined on site – such as the riparian yard and the habitat which is provided in the riparian yard for threatened species, such as bats and lizards. There is a copper skink record on the neighbouring site from 2018, therefore it is likely that the vegetation within the riparian yard provides habitat to lizard species and bats (as has been discussed in their ecology report]. Have you thought about designation conditions you might be proposing to mitigate the effects of this sensitive environment, for example, are you proposing Management Plans?	The AEE includes a statutory analysis of the documents referenced, including in consideration of ecological matters. The Ecological Assessment identifies a low risk of encountering lizards, such that there is no requirement for a site-specific designation condition. Notwithstanding, the development of the site will require regional consents (for stream works, earthworks and potentially other matters yet to be determined with an OPW scope) that will necessitate consideration of effects on ecology (i.e. Council will have discretion to consider this matter in more detail at that later stage). Such consents may result in conditions regarding lizard management. Finally, the designation does not absolve the Ministry of the requirement to comply with the Wildlife Act as separate legislation.
Freshwater ecology	Chad has indicated that the freshwater assessment and its findings are in line with best practice and are appropriate for the purpose - the impact assessment at this stage needs to demonstrate that any actual or potential effects attributable to the future development can be adequately mitigated through application of the mitigation hierarchy. His view is that the ecological impact assessment prepared by Morphum Environmental adequately describes the effects and satisfies this part of the requirements of the NOR process.	No further response or action required.
Noise	Andrew Gordon's comments in regard to reverse sensitivity and the ANNA aircraft noise contour are as follows:- <i>I note "Aircraft Noise Notification Area" or "ANNA" is the area generally between the 55 dB Ldn and 60 dB Ldn future aircraft noise contours as shown on the Aircraft Noise Overlay map for Auckland International Airport.</i> <i>I confirm a school is included in the AUP definition of "Activities Sensitive to Aircraft Noise" - means any dwellings, boarding houses, tertiary education facilities, marae, integrated residential development, papakainga, retirement village, supported residential care, educational facilities, care centres, hospitals and healthcare facilities with an overnight stay facility.</i> <i>I confirm land use within the ANNA is <u>not</u> subject to acoustic mitigation requirements specified in D24 Aircraft Noise Overlay. The purpose of the ANNA is simply to inform property owners that the property is subject to aircraft noise from flyovers.</i> <i>I expect new buildings can be designed and constructed without specific acoustic treatment and still comply with an internal limit of 40 dB Ldn (which is the limit required for new educational facilities located in the MANA or HANA). I note that use of light weight prefabricated classrooms (which have a lower façade noise</i>	No further response or action required.

Flat Bush – Pre-Lodgement Feedback from Auckland Council and Auckland Transport

Topic	Information Requested	MOE Comment
	<p><i>reduction) are unlikely to form part of the development. It is also reasonable to expect that new buildings would have mechanical ventilation and/or air conditioning. Therefore, with windows closed, I expect internal noise levels would be ≤40 dB Ldn. It is good practice to design the site to avoid, where practicable, placing classrooms in the north west corner of the site. This would also mitigate traffic noise effects on classrooms. MoE have internal guidelines to ensure external noise does not interfere with children's speech, learning and listening ability inside classrooms.</i></p>	
Archaeology and Built Heritage	I had already provided feedback for [these matters] who were happy with the reports provided.	No further response or action required. Refer above.
Visual effects	You have not provided any reporting around visual effects – are you going to address this in the AEE?	Visual amenity effects have been addressed in the AEE.
Planning	Finally, please address the relevance of both the NPS-UD in regard to on-site car parking and the MDRS with regard to this NoR. I am aware of the MoE's generic comments / positions on these matters, but it does need to be addressed in the AEE.	This matter is addressed in the AEE.