



**Te Tāhuhu o
te Mātauranga**
Ministry of Education

29 May 2026

Lachlan Muldowney
North West Rapid Transit Expert Panel Chair
Environmental Protection Agency

Via email: Substantive@fasttrack.govt.nz

Tēnā koe

COMMENTS ON APPLICATION FOR RESOURCE CONSENT UNDER SECTION 53 OF THE FAST TRACK APPROVALS ACT [FTAA-2511-1146]

Introduction

1. Te Tāhuhu o te Mātauranga | The Ministry of Education (“the Ministry”) is the Government's lead advisor on the New Zealand education system, shaping direction for education agencies and providers and contributing to the Government's goals for education.
2. In accordance with Sections 53 of the Fast-track Approvals Act (“FTAA”), the Ministry has been invited to comment by the Expert Panel on the North West Rapid Transit Project (“the Application”), lodged by New Zealand Transport Agency (“NZTA”).
3. The Ministry acknowledges that these comments have been filed after the requested timeframe and apologises to the Expert Panel for the delay. The Ministry respectfully requests that the Panel accept and consider these comments pursuant to section 53 of the FTAA.
4. The delay in providing comments has arisen due to an administrative oversight within the Ministry project team regarding the timing for invited party comments under section 53 of the FTAA. This resulted from a genuine misunderstanding as to the applicable submission timeframe and associated internal coordination processes. Once identified, the Ministry took steps to finalise and file these comments as soon as practicable.
5. Since lodgement of the substantive application, the Ministry has continued to engage constructively with the NZTA project team regarding the proposal and its interface with Ministry land and school operations.
6. The Ministry attended a meeting with NZTA representatives on 20 May 2026, which clarified a number of matters and addressed several of the Ministry's concerns regarding the Project and proposed conditions framework.
7. The Ministry appreciates NZTA's collaborative and responsive approach to date. As a result of those discussions, a number of matters have either been resolved or are now better understood by the Ministry.



8. Accordingly, the Ministry's comments are now focused on a limited number of remaining matters where further refinement or clarification of the proposed conditions framework would assist in appropriately recognising:
 - a. the operational requirements of Royal Road school;
 - b. the need to maintain safe and efficient access during both construction and operation; and
 - c. the long-term interface between the school environment and the proposed transport infrastructure.

The Ministry's Interest in the Project

9. The Minister of Education is the requiring authority for state schools throughout New Zealand under section 166 of the Resource Management Act 1991.
10. The Ministry is responsible for managing and operating the Crown-owned school property portfolio and has an interest in ensuring that transport infrastructure projects appropriately recognise and provide for the ongoing operation, safety, and future development of school sites.
11. The Ministry's interest in this application relates specifically to Royal Road School. Royal Road School is located adjacent to components of the proposed North West Rapid Transit project, including the proposed Royal Road Station, upgrades to Royal Road, and associated transport infrastructure works.
12. Royal Road School is designated for Education Purposes under Designation 4641 in the Auckland Unitary Plan: Operative in Part ("AUP:OP").

General Position

13. The Ministry generally supports the strategic intent of the proposal and recognises the broader regional and network benefits associated with the project.
14. The Ministry acknowledges that significant transport infrastructure is required to support growth and improve network resilience and connectivity across northwest Auckland.
15. Subject to the matters outlined below, the Ministry considers that the effects on school operations and future education outcomes can be appropriately managed through the proposed conditions framework and ongoing engagement with the Ministry during detailed design and construction.

Key Issues

Stakeholder Engagement

16. The Ministry acknowledges that NZTA has undertaken engagement with the Ministry during preparation of the application and has indicated that engagement will continue through future project phases.
17. However, the Ministry remains concerned that the proposed conditions framework does not include a clear and enduring stakeholder engagement requirement specific to affected schools and education providers.
18. Given the scale and duration of the project, including the proposed 25-year lapse period, the Ministry considers that reliance on informal or discretionary engagement processes does not provide sufficient

certainty that education-related operational matters will continue to be appropriately considered through future detailed design and construction phases.

19. In the Ministry's view, a formal stakeholder engagement framework should be included within the conditions to provide for ongoing engagement with affected schools and the Ministry throughout the life of the project.
20. This is particularly important given that school operational requirements, surrounding land use patterns, transport movements, and school infrastructure may change significantly over the duration of the project.

Detailed Design and School Interface

21. The Ministry acknowledges that Royal Road School is subject to an existing education designation and that future works interfacing with the designation will require engagement with the Ministry through the relevant statutory processes.
22. However, the Ministry considers that the application would benefit from a clearer and more structured process within the conditions framework to manage the detailed design interface between the project and Royal Road School.
23. In particular, the Ministry considers there are important interface matters requiring ongoing coordination, including:
 - a. the relationship between the proposed station environment and the school boundary;
 - b. pedestrian movement and activity adjacent to the school;
 - c. boundary treatment and separation;
 - d. operational access arrangements; and
 - e. integration of future road and streetscape upgrades along Royal Road.
24. The Ministry considers that the detailed design process should include a clear mechanism requiring engagement with the Ministry on matters affecting the school interface to ensure that education operational outcomes are appropriately integrated into the final design response.

Construction Noise Barrier and Boundary Interface

25. The Ministry notes that the proposed conditions relating to operational noise mitigation do not appear to include a specific requirement to engage with affected landowners regarding the location and detailed design of permanent noise barriers adjacent to school land.
26. Given the prominence and long-term nature of these structures, the Ministry considers that engagement with the Ministry should occur where permanent noise mitigation structures interface directly with Royal Road School.

Construction Traffic Management

27. Following discussions with NZTA, the Ministry is generally comfortable that the proposed Construction Traffic Management Plan framework provides an appropriate basis for managing construction-related transport effects, subject to continued engagement through implementation.
28. The Ministry particularly acknowledges the importance of managing student movements and maintaining safe access to and from the school during peak pick up and drop off periods.

Construction Noise and Vibration

29. The Ministry is generally comfortable with the proposed construction noise and vibration management framework and acknowledges that schools are recognised as sensitive receivers within the relevant management plans and assessment framework.
30. The Ministry nevertheless considers that ongoing communication with the school during construction will remain important to assist with operational planning and management of any temporary disruption.

Relief Sought

31. To address the matters raised above, the Ministry seeks the following amendments and clarifications to the proposed conditions framework (Please refer to **Appendix 1**):

Stakeholder Engagement Framework

32. That a condition be included requiring preparation and implementation of a Stakeholder Engagement Plan, or equivalent framework, specifically identifying:
 - a. affected schools and education providers;
 - b. engagement requirements with the Ministry and school leadership;
 - c. communication processes during detailed design and construction; and
 - d. procedures for managing operational school interface issues throughout the life of the project.

Detailed Design Interface

33. That a condition be included requiring engagement with the Ministry during detailed design of:
 - a. Royal Road upgrades;
 - b. Royal Road Station;
 - c. boundary interface treatments;
 - d. pedestrian and active mode connections adjacent to the school; and
 - e. any permanent infrastructure adjoining school land.

Operational Noise Barrier Engagement

34. An amendment to Condition 30 to require engagement with affected landowners, including the Ministry, regarding the location and detailed design of permanent operational noise barriers adjoining education land.

Conclusion

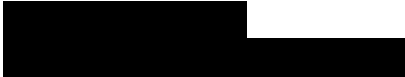
35. The Ministry recognises the strategic importance of the North West Rapid Transit project and generally supports the provision of integrated public transport infrastructure to support growth and accessibility outcomes across northwest Auckland.
36. The Ministry's comments are intended to ensure that the long-term operation, safety and functionality of Royal Road School are appropriately recognised and integrated within the project's delivery framework.

37. The Ministry considers that the amendments sought are practical, proportionate and consistent with achieving effective long-term integration between the transport infrastructure and the surrounding education environment.
38. The Ministry welcomes continued engagement with NZTA and the Expert Panel as the application progresses.

Nāku noa, nā

Kate O'Hara

Kate O'Hara
Principal Advisor – Resource Management and Planning
School Property



APPENDIX 1 – Requested Amendments to Designation Conditions

The following relief is sought in relation to the designation conditions proposed by NZTA.

Two new conditions are proposed by the Ministry relating to:

- Stakeholder Communication and Engagement Management Plan
- Design Interface Management

Amendment to conditions are sought by the Ministry relating to:

- Condition 30

The relief sought is shown in red underscore and ~~red strikethrough~~.

X1. Stakeholder Communication and Engagement Management Plan (SCEMP)

- a. A SCEMP shall be prepared in consultation with Stakeholders prior to the Start of Construction. The objective of the SCEMP is to identify how the public and Stakeholders will be engaged with throughout Construction Works.
- b. To achieve the objective, the SCEMP shall include:
 - i. A list of Stakeholders;
 - ii. A list of properties within the designation which the Requiring Authority does not own or have occupation rights to;
 - iii. Methods to engage with Stakeholders and the owners of properties identified in X1.b(ii) above;
 - iv. The contact details for the Project Liaison Person. These details shall be on the Project website, or equivalent virtual information source, and prominently displayed at the main entrance(s) to the site(s).
 - v. Methods and timing to engage with owners and occupiers whose access is directly affected;
 - vi. Methods to communicate key project milestones and the proposed hours of construction activities including outside of normal working hours and on weekends and public holidays, to the parties identified in X1(b)(i) and (ii) above; and
 - vii. Linkages and cross-references to communication and engagement methods set out in other conditions and management plans where relevant.
- c. Any SCEMP prepared for a Stage of Work shall be submitted to Council for information a minimum of ten working days prior to the Start of Construction for a Stage of Work.

X2. Design Interface Management

- a. Prior to the commencement of detailed design for a Stage of Work, the Requiring Authority shall undertake engagement with Relevant Stakeholders regarding design interface matters associated with that Stage of Work.
- b. The purpose of the engagement shall be to:
 - i. identify stakeholder specific interface issues, constraints and operational requirements;
 - ii. inform the development of the design where relevant and practicable; and
 - iii. support appropriate integration of the Project with adjoining properties, activities and public spaces.
- c. Engagement under condition X2(a) shall commence at least six months prior to the commencement of detailed design for the relevant Stage of Work, unless otherwise agreed with the relevant Stakeholder.

- d. Engagement shall address matters relevant to the Stakeholder and the Stage of Work, which may include:
 - iv. Design interface matters may include, where relevant:
 - v. pedestrian, cyclist and vehicle access and connectivity;
 - vi. boundary treatments and separation;
 - vii. operational access arrangements;
 - viii. integration with adjoining land uses and activities;
 - ix. streetscape and public realm interfaces; and
 - x. measures to manage potential adverse effects on adjoining properties and activities.

Condition 30.

- a. Prior to the start of construction works, a SQP shall identify those PPFs where, following implementation of the Noise Barriers:
 - i. The external traffic-noise level at the façade facing the Project is higher than 67 dB LAeq(24h), and
 - ii. A noise level increase of 1 dB or more will occur due to the Project implementation; and
 - iii. where Building-Modification Mitigation might be required to achieve 40 dB LAeq(24h) inside Habitable Spaces ('Category C Buildings') as far as reasonably practicable
- b. Prior to the construction of any noise barriers, the Requiring Authority shall engage with the relevant land owners of the PPFs.