



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

Hutt City Council
30 Laings Road
Hutt Central
Lower Hutt 5010

21 November 2024

Attn: Hearing Commissioners for Eastern Hills Reservoir
Sent via email to saritha.shetty@huttcity.govt.nz

Dear Commissioners

Ministry of Education - Letter to be tabled at the Notice of Requirement for the Eastern Hills Reservoir Hearing

1. Introduction

The Ministry of Education (the Ministry) made a submission in relation to Hutt City Council's (requiring authority) Notice of Requirement (NoR) for the Eastern Hills Reservoir on 3 May 2024.

The Ministry will not attend the hearing and instead requests that this letter be tabled for the Hearing Commissioners' consideration in lieu of attendance.

The Ministry understands that the NoR intends to designate land required for the construction, operation and maintenance of a new reservoir at the top of Summit Road, Fairfield (37 Summit Road). The purpose of the project is to improve water security, reliability and increase business and residential confidence in Lower Hutt's water infrastructure.

2. The Ministry's Submission

The Ministry has an interest in the proposal as the proposed route for construction vehicles extends along Daysh Street past four school sites, including the combined school site for Naenae Intermediate School, Naenae College and Kimi Ora School, as well as Belmont School which is located just off the northern end of Fairway Drive.

The Ministry position on the proposal is neutral, subject to the inclusion of conditions to manage the actual and potential effects of the movements of heavy construction vehicles to increase student safety at peak pick-up and drop-off (PUDO) times. Each school has a unique peak PUDO time, varying between 8:15 to 9am and 2:45 to 3:30pm respectively. The Ministry requested a condition to restrict heavy vehicle movements past the schools during peak PUDO times, as outlined below:

8. Heavy vehicles will avoid travelling past the schools listed in the following table during peak before and after school travel times, during term time only.

Before any construction works begins where there are heavy vehicle movements are traveling along Daysh Street or Fairway Drive, the four schools listed in the table below must be informed at least 10 working days before the works begin.

Advice note: A heavy vehicle is defined as any vehicle larger than a ute or van.

<u>School Name</u>	<u>Address</u>	<u>Associated no travel route</u>	<u>Times heavy vehicles must avoid the schools</u> (based off each school's individual start and finish times) ¹
<u>Belmont School</u>	<u>709 Western Hutt Road, Belmont, Lower Hutt 5010</u>	<u>Fairway Drive / Kennedy Good Bridge (between SH2 and Harcourt Werry Drive)</u>	<u>8:15 to 9:00am</u> <u>2:45 to 3:15 pm</u>
<u>Naenae Intermediate School</u>	<u>100 Walters Street, Naenae, Lower Hutt 5011</u>	<u>Daysh Street (between High Street and Oxford Terrace)</u>	<u>8:30am – 9.00am</u> <u>2.50pm – 3:30pm</u>
<u>Naenae College</u>	<u>910 High Street, Avalon, Lower Hutt 5011</u>	<u>Daysh Street (between High Street and Oxford Terrace)</u>	<u>8:30am – 9.00am</u> <u>2.50pm – 3:30pm</u>
<u>Kimi Ora School</u>	<u>100 Walters Street, Naenae, Lower Hutt 5011</u>	<u>Daysh Street (between High Street and Oxford Terrace)</u>	<u>8:30am – 9.00am</u> <u>2.50pm – 3:30pm</u>

In addition, the Ministry supported the requirement for the preparation of a Construction Traffic Management Plan ('CTMP') to be approved by Hutt City Council prior to works under Condition 25. Condition 26 sets out the information to be included in the CTMP.

The Ministry sought to add 'Details of briefings to heavy vehicle drivers about the importance of slowing down and adhering to established speed limits when driving past any school site' to the CTMP requirements under Condition 26. Similar conditions have been proposed and adopted on projects across the country, where works have the potential to affect the safety of students during PUDO times at school sites.

3. Ministry's position on the Applicant's Evidence and s42A Report

Hutt City Council's (Council) section 42A Report ('s42A Report') dated 7 November 2024 was prepared by Consultant Planner Dan Kellow and does not include the conditions as worded above. In a Statement of Evidence provided from Harriet Fraser, Transport Planning and Traffic Engineering Specialist for the Council, they advised that enforcing a condition to restrict heavy vehicle movements past schools during peak times

is unnecessary. Ms Fraser noted that Naenae Road, Daysh Street, and Fairway Drive are arterial roads which are designed to accommodate heavy vehicle movements. Ms Fraser also noted the presence of an existing signalised pedestrian on Daysh Street crossing providing safe access to the combined school site. Mr Kellow has agreed Ms Fraser's recommendation and therefore, declines the addition of this condition. Whilst the Ministry acknowledge that the road is an arterial route, this does not negate the need to consider and mitigate the traffic safety effects of the additional heavy vehicle movements from the proposal on road users, including students, staff and visitors of schools along this route.

In addition to the above, as discussed earlier, the Ministry also requested an addition to Condition 26, to require truck drivers to be briefed on the need for safe driving practices past local school sites. Ms Fraser stated that this matter could be included in the CTMP requirements under Condition 26. Mr Kellow has agreed, noting in the Section 42A report that he considers this requirement could be included in Condition 26 clause (f) as requested by the submitter.

For completeness purposes, the Ministry wish to highlight that over the 2–3-year construction period there will be a high volume of heavy construction vehicle movements, exceeding 20,000 trips. As outlined in the Ministry's submission, the Ministry has concern for the safety of students walking and cycling to school and getting out of cars at peak PUDO times. In addition, the Ministry is concerned that increased heavy vehicle movements could pose a risk to the safety of students/parents/staff using the road network outside the schools due to congestion and reduced visibility from large trucks. It is not fanciful to consider that the construction of this project may also coincide with the construction of the RiverLink Project adjacent to Belmont School. As such, the cumulative increase in heavy traffic from both projects could increase the safety risk to road users outside the school. The Ministry note that cumulative effects have not been considered by Mr Kellow in the s42a report.

4. Concluding statement

The Ministry requests the Hearings Panel consider the Ministry's sought condition relating to the avoidance of heavy vehicles travelling along Daysh Street during key PUDO times outside schools (during school term time). A condition to this effect would appropriately mitigate potential and actual traffic safety effects on students, their families and staff by restricting heavy vehicle movements past schools during PUDO times.

Should the condition be accepted by the Hearing's Commissioners, then the relief sought by the Ministry would be considered adequately resolved.

If you wish to discuss aspects of this letter, please do not hesitate to contact the undersigned as a consultant to the Ministry.



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