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10 October 2025

Sunfield Developments Limited (SDL) Section 55 Response to Comments Received from Invited Parties Under Section 53 – FTAA-2503-1039

The purpose of this note is to provide responses to the comments received in relation to the Sunfield Masterplanned Community on 4 August 2025.

The below table is a succinct response to the queries raised, with the addendum reports providing more detailed responses, where merited. This includes:

- Attachment C9 Landform Section
- Attachment C10 Active Mode Plan
- Attachment C6 Open Space Flood Map and Inundation Model
- Attachment C5 Neighbourhood Testing Plans
- Attachment C6 Open Space Distribution Plan

Annexure 18: Urban Design Robert Mainwaring Annexure 9: Parks Planning Lea van Heerden

Note, only comments against selected relevant paragraphs of Council's report are included.

Comment T No.	Theme	Comments	Res	sponse
n	Land modification / density	The existing floodplain requires significant drainage works to be viable, and large-scale earthworks are proposed to the better ground to the east of the site. I do not support the 18m+ cut to modify the southeastern hillock, to be replaced with single-storey aged care units.		Land modification – 18m cut - Earthworks in this area are required for site cut/fill balance and improved flood resilience of Sunfield. SPA accept the response from Reset Landscape Architects in that " While keeping the 'hillock' landform would have provided some visual interest to the urban form of the proposal, it is not considered a significant landform or feature, and the elevation of Old Wairoa Road will still maintain some

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			'height' in this location". A section has been provided that conveys how this
			area will interface with Old Wairoa Road, please refer Attachment C9.
18.10	Public Transport	The site is not currently well-served by public transport. The proposals contain provision for bus connections, and ultimately the Sunbus operating around the Sunfield Loop. However, it is unclear how effective the Loop and Sunbus will be until full development is realised, or what may happen in the event of development stages stalling or halting, or if the Loop is not provided (see the comments below arising from the applicant's s67 response).	 Public Transport – The Sunfield "loop" public transport route can be implemented from Stage 2 onwards. The route can be established with autonomous vehicles or conventional buses that will adapt to the evolving loop route as Sunfield develops. Without the full Sunfield loop in operation there is still active transport connectivity via the internal pathway network and by Mill Road as detailed in the site wide active mode plan in Attachment C10
18.11	Parking	Whilst the overall aim is for a car-less environment, the location and development phases are likely to result in cars continuing to form a significant part of private transport, at least until the Sunfield concept has been completed and tested. Formal vehicle parking is provided for 10% of residents, so the proposal is likely to result in uncontrolled vehicle parking within and around the site. A detailed and comprehensive site-wide cycle network supporting car-less living has not been provided.	Parking - Initial stages will have greater temporary parking provision, which will reduce over time as infrastructure and amenities become established. The initial stages will have higher parking provision until more of the Sunfield amenity is up and running, temporary parking lots can be designed into the early stages with a grandfathering period. SPA's latest neighbourhood design testing shows how a neighbourhood will function to manage parking demand. There will be little opportunity for spill over Public Parking in the newly established areas to the west of Sunfield as parking restrictions are already in place and opportunities for parking there are limited.

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			This is not a typical development in that people will be buying into the car- less strategy. Purchasers will have an awareness of the parking enforcement and body corporate society (or equivalent) rules around parking.
			Key amenity like schools and the local centre are located on public transport and cycling connections.
			Cycle network - A detailed site wide active mode (including cycle network) plan has been provided, please refer Attachment C10
			The active mode crossings points need to be safely designed and would be resolved in more detail at EPA level with Council and AT input.
18.12		The required substantial drainage solution is proposed as a drainage reserve. However, usable open spaces within the proposals are limited, and the function and amenity of those spaces are likely to be impacted by stormwater events.	The statement does not acknowledge the recreation amenity benefits of the extensive sitewide network of pedestrian and car-less lanes in the neighbourhoods. • Stormwater – Please refer to the Stormwater Reserve Open Space Flood map and inundation time model included in Attachment C6. Stormwater management and active recreation functions can overlap; there is precedent for this to work i.e Greenslade Reserve, Northcote.
18.13		The structure and functionality of the residential neighbourhoods, neighbourhood hubs and laneways are not demonstrated. Detailed and resolved plans of typical blocks	Refer 18.11, and; • Functionality and Laneway Design — Neighbourhood testing has been included refer Attachment C5. The neighbourhoods have addressed the

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		(including housing typologies, parking, roads/streets/lane networks, public and private interface, services, deliveries, emergency access, and open spaces) are not provided.	issues of emergency access (through FENZ engagement), deliveries, servicing, open space public private interface, parking, and high-level CPTED considerations.
18.14		The neighbourhoods rely heavily on nested JOAL environments (private leading to private), which raises fundamental concerns with access and safety. Given the complexities and novelty of the proposed neighbourhoods, I encourage early-stage FENZ and CPTED assessments be carried out. Similarly, given the scale of the project, I encourage the applicant to collaborate with Council and the AUDP with a series of regular reviews/workshops.	 CPTED – The requirement for a CPTED review is not considered to be necessary given the detail provided within the plans, and conditions requiring detailed design to be provided both for buildings and landscaping elements. Design Review Panel - A traditional Resource Consent urban design panel would not be feasible with the Fast Track Consenting pathway, and adds an additional and unnecessary layer. An Applicant administered Design Guide Approval Panel to ensure the built form is delivered as per the design guides will be implemented.
18.18	Landform modification	An elongated hillock exists in the southeast corner of the site. The recent development to the south of Old Wairoa Road generally follows the natural landform with Nola Dawn Avenue aligning with the ridge. The hillock affords extensive views across the site and Manukau Harbour beyond. It is unclear if this hillock has significance to mana whenua.	Refer 18.09
18.20-21	Landform modification	The planning report and engineering reports confirm that the proposed groundworks include a maximum 18m cut (approx. six storeys) to the hillock in the southeast corner of the site. No sections or visuals are presented showing proposed gradients following the removal of this	Refer 18.09

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NO.		landform, the interface with Old Wairoa Road and the neighbouring development to the south, or the level of effects of these earthworks. A proposed site section through the southeast hillock on SL22, showing existing ground line, proposed levels and buildings will clarify the site's relationship to Old Wairoa Road and existing neighbourhood to the southeast.	
18.22	Landform modification	The LVEA (item 6.123-127) does not mention the cut and states the built form would extend along the localised highpoint/ridge in a similar manner to the southern side of Old Wairoa Road. This does not reflect the proposals.	Refer 18.09.
18.25	Building typology and density	The unique ground conditions do not appear to have led to the exploration of appropriate alternative building structures, and so the intensity of proposed development and urban design is limited by the soil conditions. From personal experience of living and working in peaty landscapes (Norfolk and Scotland in the UK, and the Netherlands), there is an array of tested solutions for building at some density in similar conditions.	Building Typology – Advice from the project geologists has confirmed that conventional light weight timber framed building up to two storeys high are the most suited to the peat geology underlying Sunfield.
18.28	Density	Within residential super lots, the proposed development achieves a density of approximately 40 du/ha across the site, which I consider to be relatively low density. The proposed neighbourhoods generally consist of two-storey houses (detached and duplexes), single levels of apartments in local hubs, and single-storey retirement villas. The development contains no terraces or apartment blocks of 3+ storeys (due to ground conditions).	Density - The residential neighbourhoods in Sunfield are medium density, not 'low density'. At 40 dwellings per hectare, the development sits well within the medium-density range, based on our analysis and experience across large-scale housing projects throughout New Zealand. The current typology mix reflects a commercial decision by Winton,

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			balancing feasibility with market demand.
			It is important to recognise that density is determined not only by the choice of building typologies but also by the efficiency of the masterplan block network. Sunfield demonstrates the latter, achieving mediumdensity outcomes without relying on higher- intensity typologies such as terraces.
			The masterplan has been configured with a high degree of spatial efficiency, enabling the delivery of predominantly compact standalone and semi-detached dwellings at medium density. This outcome is supported by the car-free street network, which significantly reduces land requirements for road infrastructure and on-site parking.
			We have provided a variety of housing diversity including apartments, 2-4+ bedroom houses, duplex, and standalone typologies.
			Options for age-in-place has been provided for via the retirement villages and intergenerational housing typology options with accessible ground floor bedrooms and bathrooms.
			Apartments over hubs are a pocket of density

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			The site is not as suitable for high density (due to ground condition constraints).
			Terraces are not included due to commercial reasons as suggested by the Applicant in terms of saleability and current market saturation.
			If density shifted to higher and the demand was there, then open space could be reconsidered.
18.29	Density	I agree with the UDA (13.1.1) that Sunfield has the scale and critical mass to be able to be bold. Notwithstanding the limitations posed by ground conditions, I would encourage increased density and variety of typologies across the site. The masterplan is of a scale where pockets of higher density could be achieved, balanced by the provision and variety of appropriate open spaces. However, changes to the density would require a further re-consideration of the adequacy of the open space network.	Refer 18.28
18.30	Travel demand	The overall premise of Sunfield is that people will live and work within the site. I am doubtful of how realistic this assumption is, in the long term and during the estimated 10-15 years delivery of the project.	Travel demand – The statement "The overall premise of Sunfield is that people will live and work within the site" is not accepted. The masterplan proposes people will have the "opportunity to work" within the site, not that they all will do so, this was conveyed in the Master Plan report with the initial application.
18.31-33	Parking		Refer 18.11

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NO.		3,854 homes are proposed, and 11,000 permanent jobs (with a likely reduction due to the Mill Road Notice of Requirement), delivered over a total of 25 superlots / phases. The Sunfield Scheme Plans (including Staging) indicate that 1370 dwellings (35%) will be constructed in stages 1-6, before construction of the town centre and healthcare facility (stage 7). The school precinct is shown as stage 13, and the employment area follows later (Superlots 16 -21). As the UDA states, residents are likely to travel to the adjacent centres of Takanini and Papakura (UDA 6.1.3) and employment destinations at Manukau, Auckland Airport, East Tamaki, Onehunga, Māngere (UDA 6.1.4). Similarly, large numbers of people will be travelling to Sunfield to use the employment zone, town centre, healthcare and school when complete. I note that the Transport Assessment (9.1.6 Mode Share) assumes 50% of all employees will live in Sunfield, when complete).	
		As such, it is highly likely that there will be large movements of people in and out of Sunfield. Whilst some connection to public transport is accounted for in the proposals, I anticipate that car journeys will continue to form a significant mode of transport. The ability of the proposals to accommodate a greater number of cars, sufficient parking spaces, and the effect on urban design, is unaccounted for in the proposals.	
18.34	Parking	The residential superlots provide parking for 10% of residential units. With minimal formal provision for vehicle parking, the proposal is likely to encourage uncontrolled parking within the site. Vehicles are likely to be parked on berms within vested road reserves, across footpaths, within laneways on landscaping strips etc., as seen in existing developments west of Mill Road. If	Refer 18.11

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NO.		uncontrolled parking within the site is somehow prevented, the issue is likely to move to adjacent residential neighbourhoods and rural roads (closer to the employment area). This will undermine the amenity of the development and poses potential safety issues for pedestrians and cyclists.	
18.36	Public Transport	The staging indicates that the Sunfield Loop isn't complete until the final stages of development. It is therefore unclear how effective the Loop and Sunbus will be until full development is realised.	Refer to the traffic response and Infrastructure staging plan and; • Public Transport — The Sunfield "loop" public transport route can be implemented from Stage 2 onwards. The route can be established with autonomous vehicles or conventional buses that will adapt to the evolving loop route as Sunfield develops. Without the full SF loop in operation there is still active transport connectivity via the internal pathway network and by Mill Road as detailed in the site wide active mode plan in Attachment C10.
18.37	Sunfiled Loop	I also note that the Applicant's s67 response confirms at 2.6.1 that the applicant does not own all the land required to provide the proposed Sunfield Loop. They note that turning facilities are provided for vehicles and buses in this regard. I understand that AT has expressed concern with the lack of continuity for all modes if the 'loop' is not provided. I agree with this concern from an urban design perspective. As AT's comments note, this would result in less reliance on active modes and public transport due to longer travel times.	Refer 18.36
18.38	Cycle infrastructure	The general approach to cycle lanes and infrastructure is supported. However, there are sections of the site where the provision for cycle lanes is unclear. A comprehensive site- wide plan showing the full cycle	Refer 18.11

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		network around and within the site (demonstrating connections to key local destinations e.g. Bruce Pulman Park) will clarify this. It should also demonstrate how each lot is served by cycle infrastructure e.g. for houses fronting onto Cosgrave Road, which is noted as a significant road in the Southern Growth Corridor1. Additional typical detailed drawings should demonstrate how cycle priority and safety are achieved at major and active mode crossings.	
18.39	Streetscape design	The residential superlots provide parking for 10% of residential units. Typical detailed studies should be provided showing how vehicle crossings integrate into the streetscape and landscaping.	Refer 18.11, and; • Landscape Design Information - The Residential Design Guides have sufficient information to understand the landscape structure in the laneways. The neighbourhood testing documentation gives more clarity of the intended landscape design approach in the laneways. Landscaping of vested roads must be signed off by Council at EPA level. Council will have the opportunity to input into the softscape and hardscape design to ensure it meets their requirements.
18.41		I do not support the placement of the single-storey Homehill aged care on the footprint of the southeastern hillock. Alternative residential dwellings with simpler access requirements, in a layout that responds to the natural landform, will help retain the natural feature, minimise earthworks, and take advantage of the elevated aspect	Refer 18.09
18.43	RUB	As highlighted in the planning report, the development does not resolve the repositioning of the Rural Urban Boundary (RUB). The site boundary is suggested,	RUB - The centre is positioned at a legible structuring crossroad of the proposed upgraded Hamlin Road and the Sunfield Loop route. Each of these

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No.		however this is not a naturally defensible location. The position of the town centre is not central to development and appears to anticipate further development to the north of the site.	major roads are proposed to have a public transport service which gives town centre users multiple bus route options. The centre has been co-located with a variety of land use activities to support agglomeration activity: a park, employment precinct (servicing workers), a residential neighbourhood, and close to a healthcare hub. It should be noted that the Ardmore Airport designation and resulting noise contours prevented residential use in this area.
			A project of this scale and amenity offering will influence the future RUB. This is not seen as an issue, rather affirmation that Sunfield is a successful development. Note, there are other factors not related to Sunfield that could also justify for development north of the site in the future for example the increased connectivity from the NZTA Mill Road RoN project.
18.45	Open space	The open space strategy provides a significant amount of amenity and an interconnected series of spaces across the site, providing a range of recreation spaces and off-road routes across the site, which is generally supported. However, I also note that play spaces, artworks and similar amenities are clustered around the central drainage reserve that concerns are expressed in the Parks memorandum that the stormwater land and the formal recreation spaces have different incompatible purposes. Location of play areas etc. within the residential neighbourhoods would likely provide easier access to amenities for residents.	Open Space – There is a revised Open Space Distribution Plan which proposes three new neighbourhood parks to address the amenity gap concern raised by Auckland Council – refer Attachment C6. Council hasn't acknowledged the informal recreation offering presented by the extensive network of car-less pedestrian friendly lanes. While these don't perform the same function as a Council neighbourhood park (flat green area and playground) we argue the lanes should be acknowledged as recreation amenity which kids could play in - cricket, ride bikes, scooters etc.

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			Stormwater management and active recreation functions can overlap; there is precedent for this to work i.e Greenslade Reserve, Northcote.
18.46	Open space flooding	The parks are integral to the engineered drainage for the entire site and will flood regularly. The extent to which recreation spaces and connections will be affected by flood events is unclear (e.g. how much space will be lost, how long it will take for flood waters to fall, and how long flooded areas will need to recover before use). I note that during discussions with Council's parks team, an initial observation is that the central drainage reserve appears too small to accommodate both the drainage requirements and amenities, and may need to double in size in order to be a viable drainage reserve and park.	Refer 18.12
18.47	Recreation staging	Other than mass earthworks taking place early in the development programme, a programme for the open spaces is not presented. The open space network forms an essential part of the movement strategy and amenity for residents. I suggest that these amenities (including the Sunfield Loop) are completed by the build-out of superlots 1-5, to ensure amenity to the early phases of residents and this should be a requirement of a condition of consent if the application is granted.	Recreation Staging - We would support the open space amenity being put into the staging or yield cap triggers - from an urban design perspective, open space amenity is an important social infrastructure.
18.49	Laneway design	Apart from vested roads, laneways are a major component of Sunfield. These are proposed as generally 6m wide shared spaces, with minimum 8.4m between buildings, encouraging car-less living. The hierarchy and legibility of these laneways is not clear, and a person's journey from public road to residential front door needs clarification, including: The interface and junctions of all lane types to local and primary roads Wayfinding	Refer 18.13

Comment No.	Theme	Comments	Response
		Crossings and bays for Local and Neighbourhood Service Hubs Distinction between trafficable lanes, lanes, and pedestrian lanes.	
18.50	Neighbourhood functional design	The structure and function of the residential neighbourhoods revolves around the neighbourhood hubs as the local refuse/recycling point, cycle storage, loading bays, post and courier boxes, and pick-up dropoff services (I note that drop-off / Loading zones for local hubs are not indicated on the engineering and roading plans). The proposed layouts require residents to travel significant distances between their house and the hub facilities. For example, in Neighbourhood 1 the hub is over 180m from many residential units. This seems impractical and I anticipate will encourage deliveries and loading within the lanes.	Refer 18.13
18.51	Laneway Design	It is not clear if the laneways are one-way, and no passing or loading bays are indicated. As presented, the lanes do not have the ability to accommodate multiple essential vehicles and services simultaneously (e.g. supermarket deliveries, service vans, removals trucks, taxi from medical appointment, couriers or deliveries such as Uber Eats). If car parking was required at any future date (e.g. agreed by the Residents Association), the current lane network would not support this	Refer 18.13
18.52	Laneway Design FENZ	A key concern is the ability for FENZ to access properties unimpeded. Other than all properties being within reach of a fire hose, this is not demonstrated. As such, it is difficult to see how the laneways, and ultimately the residential neighbourhoods, will function as described in the documentation.	Refer 18.13

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18.53	Access strategy – Aged Care.	Within the aged care precincts, the majority of units face onto neighbourhood roads (vested), not laneways. Some bays for care share parking are indicated, but there is little provision for pick-up/drop-off. Given the nature of the aged-care precincts, I suggest that an access strategy be provided, clarifying accessible routes, pick-up-drop-off zones, pedestrian crossings if required, and travel distances to units.	 Access Strategy, Retirement – an access strategy for each retirement village can be provided with the detailed design of the facility. A 5.7m wide carriageway in these facilities allows sufficient width for parking within the movement lane as per ASNZ4404. Pick up or drop off provisioning can be either in one of the numerous shared parking bays or within the movement lane.
18.54	Planting design	Whilst the overall strategy for landscaping is supported, detailed landscape designs are lacking (planting palettes are provided). From an urban design perspective, these should clearly identify street trees, and what landscaping falls within private and public ownership (including JOALs	 Planting Design – A neighbourhood testing plan has been included, please refer Attachment C5. There is more design detail of how the laneways and surrounding street's function in this submission. Detailed planting design will be resolved at the EPA level.
18.55	Edge conditions	Some typical sections are included in the application; however, these are not extensive. Comprehensive site sections across the site boundaries should be provided, detailing the interface with the public realm and adjacent neighbouring sites	Edge Conditions - Sufficient information is provided in the Design Guidance documents to understand the edge interfaces with with the public realm. For clarification purposes we confirm that the edge interfaces with the surrounding residential neighbourhoods is of a commonly seen characteristic in Auckland where two-storey medium-density housing adjoins suburban residential. The new section through old Wairoa Rd has also been provided to demonstrate how the typical Sunfield housing mass might interface near to an existing residential area through one of the steeper land typography moments.

The Application describes the development as 'sustainable' and revolves around 'healthy homes.' Other than the intent to reduce private vehicle use, and the inclusion of photovoltaic panels, there is little quantifiable material to support these aspirations **Building Design and sustainability - The design controls for the built form constructors will encourage the implementation of a minimum Homestar 6 rating to ensure a healthy home outcome and address issues such as solar gain/shading, ventilation, and thermal modelling to deal with overheating risks. The Design Controls include sustainability design features such as encouraging the use of low carbon building materials, weather protected entrances (reducing dampness), and providing age-in-place design features, etc. Every building will be required to install a photovoltaic (PV) panel on its roof with residential dwellings required to have sufficient panels to produce a minimum SkW per home. The power grid proposed within Sunfield will be an embedded network allowing residents to directly benefit from solar generation which will significantly reduce energy costs. The major GHG emission issue has been reported on in the Sustainability and GHG Emissions Assessment (6 Feb 2025) by Stantec that was submitted as part of the Sunfield FTAA application.

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			The applicant proposes measures through the life of the development that
			will significantly lower greenhouse gas (GHG) emission generation when
			compared to a conventional development.
			The reduced car ownership and resultant low trip generation will lead to a
			significant reduction in GHG emissions.
			Sunfield's movement network has been designed around walking, cycling
			and micromobility preferences which reduces the need for wider trafficable
			pavements.
			The proposed automated public transport system (Sunbus) will be fully
			electric further reducing the GHG emissions from the development.
18.58	Passive house	The proposals say that buildings will be designed to passive principles. Speaking as a Certified Passive House Designer, I would argue that the only principle is that building performance should be modelled and tested. This will provide further certainty in the outcomes of the development, in addition to the proposed design controls	Refer 18.57
18.59	Sustainable Communities (Greenstar)	Assessments such as Green Star Communities are suited to large scale projects such as the proposed Sunfield masterplan, and support the development of more human-centric, healthier, lower carbon neighbourhoods and communities	Refer 18.57
18.60	Sustainable Buildings	There are a number of practical and measurable building performance standards such as NZGBC Home Star and Green tar, NABERSNZ or Passive House, and I would encourage any of these standards (or	Refer 18.57

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		equivalents) to be employed and proffered as a condition to qualify as 'healthy homes'. These standards focus in reducing energy demand before the use of renewables, more comfortable indoor environments with reduced overheating, provision of good indoor air quality (with coincidentally improved acoustic performance, noting the proximity to the Ardmore airport), and bring long-term financial benefits to occupants	
18.61	CPTED	As identified in the UDA (14.3.1), a detailed CPTED assessment should support the application	Refer 18.14
18.62	Plan B strategy	The items raised above are all interrelated and key to the success of the development and urban design. As highlighted in the UDA (14.2.1), A Plan B strategy needs to be in place for the critical elements that support the car-less model	The planning consent conditions, planned monitoring and infrastructure staging plan will address this issue.
18.63 - 64	Design Review Pannel	Although this project is progressing through the Fast Track process, it would ordinarily meet the thresholds for review by the Auckland Urban Design Panel. A proposal of this scale would also go through multiple panel reviews to investigate matters across different scales – masterplan, precinct plans, block and site plans. It is therefore strongly recommended that the applicant seek input from the Panel to help ensure high-quality urban design outcomes including a dedicated panel to ensure a consistent and coordinated design review through the various stages of the project, similar to the 'Hobsonville Design Review Panel' The applicant should document the Panel's feedback and, where appropriate, demonstrate	Refer 18.14

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		how the recommendations have been considered in the final design. A summary of this engagement can be provided to the Council Design Review to support design quality assurance.	
18.65	Landscape Design information	I share the view made by Council's Landscape Architect that the detailed landscape design needs to be resolved well in advance and presented at the time of lodgement of this application. Leaving this matter to a certification process prior to the commencement of construction doesn't demonstrate how the development, including landscaping, will function	Refer 18.39
18.66	Parks and Open Space		The Councils open space memo has been reviewed and agree that the provision of additional open space that performs the function of neighbourhood parks within the neighbourhoods would contribute to a more balanced and accessible open space network. However, we propose that the size of these additional parks could be reduced whilst still meeting the functional requirements of a neighbourhood park, given the extensive network of open spaces already proposed which includes: • 11.9ha of neighbourhood parks • 3.4ha of vested formal sports and recreation facility (Lot 2006) • 10.4ha Wai Mauri Stream Park • 9.5ha Northern Wetland Park The total area of Open Space proposed in the Sunfield development including the stormwater conveyance areas is ~53ha.

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-			Please refer to the Open Space Areas Plan in Attachment C6.
			In addition, there will also be significantly more open space provided for by way
			of the Awakeri Wetlands extension (not part of this application but embedded
			in the Sunfield development), the extensive laneway network and the
			perimeter and internal swale network.
			The Council's analysis of open space provision takes no account of the extensive
			and significant role of the 'car less' laneways throughout the entire development.
			These laneways and the car free nature of living in these neighbourhoods will
			provide for a rich range of doorstep play and 'play along the way' opportunities
			that fall outside of the current policy classifications.
			As such we propose the addition of three new 0.1ha neighbourhood parks which are identified on the Open Space Distribution Plan in Attachment C6.
			Council policy (Manaaki Tāmaki Makaurau Auckland Open Space, Sport and
			Recreation Strategy, May 2025) requires that neighbourhood parks should be
			0.2ha within 400m walk in high and medium density areas with high capacity. For
			the reasons outlined above, and factoring in the additional, and significant,
			benefits of the extensive car free laneway network we believe that these
			neighbourhood parks could be reduced to 0.1ha in size. At this scale the parks
			would comfortably provide for all of the functional amenity required of a
			neighbourhood park, specifically that they include a level, unobstructed grass
			space for informal games of at least 20m x 20m in parks less than 0.3ha in size.

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			As is demonstrated by the 300m radial catchment shown in the appended plan
			the addition of these three additional neighbourhood parks, combined with the
			existing proposed neighbourhood parks and inclusion of the school, provide for
			an even distribution across the whole development including significant overlap
			in a number of neighbourhoods providing variety and choice.
			When taken in totality the combined open space provision proposed throughout
			the development creates a highly connected network of both formal and
			informal recreation opportunities at a range of scales to meet the needs of the
			community.
			Proposed Lot 2006 is now proposed to vest as Recreation Reserve, this area has a concept design for formal sports field and an aquatic centre, please refer
			updated Scheme Plans
			The 1 in 2-year and 1 in 10-year flood reach has been modelled in each area of open space with respect to formal play areas., additionally the time of inundation has been calculated, this information is detailed in Attachment C6 .
			The effect of peat soils on the long-term stability and maintenance of recreational infrastructure has been assessed as negligible – please refer to the geotechnical reporting.
			The impact of the Firstgas pipeline designation over the open space network should be negligible as the Applicant has proposed to develop the reserve and

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			position any of the open space infrastructure clear of the pipeline's designation
			requirements. The Applicant notes there is extensive precedent of this pipeline
			traversing vested reserve land and public open space.