

BEFORE AN EXPERT CONSENTING PANEL

IN THE MATTER of the Fast-track Approvals Act 2024 (**FTAA**)

AND

IN THE MATTER of an application for approvals by Winton Land Limited to subdivide and develop 244.5 hectares at Old Wairoa Road, Cosgrave Road, and Airfield Road between Takanini and Papakura, Auckland into approximately 3,854 homes, consisting of individual homes and 3 retirement villages containing independent living units and associated features such as a 7.5 hectare town centre, a school, 4 local hubs, open spaces, green links, recreation parks and reserves and ecological areas (**Application**)

**‘WILL SAY’ STATEMENT FOR EXPERT WITNESS CONFERENCING BY
MARTIN PEAKE, CRAIG RICHARDS, AND SAULIUS VINGRYS (AUCKLAND
TRANSPORT)**

Transport Planning and Engineering, and Public Transport

Dated: 7 November 2025

1. INTRODUCTION

- 1.1 This joint 'will say' statement is provided by Martin Peake, Craig Richards and Saulius Vingrys on behalf of Auckland Transport (**AT**) in relation to expert witness conferencing for the Sunfield Fast-track Application under the FTAA.
- 1.2 This statement relates to transport planning and engineering matters, including public transport-related matters, arising from the Application.
- 1.3 In the interests of efficiency, while Martin Peake and Craig Richards have previously prepared separate reports (Annexures 1 and 2 to Auckland Transport's Specialist Memo dated 4 August 2025), a joint statement has been prepared for the purposes of expert witness conferencing.
- 1.4 Saulius Vingrys has not previously prepared a report in relation to the Application. Saul is a public transport (**PT**) specialist at AT – holding the position of Public Transport Network Development Manager – and has joined this statement solely to address issues relate to PT, including the Panel's PT-related questions set out in Minute 13 dated 5 November 2025.

2. QUALIFICATIONS AND EXPERIENCE

Martin Peake

- 2.1 Martin Peake is a traffic engineer at Progressive Transport Solutions Limited with over 30 years experience. Martin's qualifications and experience are set out at section 2 of his Technical Note dated 29 July 2025 (Annexure 2 to Auckland Transport's Specialist Memo dated 4 August 2025), and are not repeated here.

Craig Richards

- 2.2 Craig Richards is a traffic engineer at Beca with more than 20 years experience. Craig's qualifications and experience are set out in a letter to the Panel dated 23 September 2025, and are not repeated here.

Saulius Vingrys

- 2.3 Saulius Vingrys is Auckland Transport's Public Transport Network Development Manager. Saul's qualifications and experience are detailed in **Attachment 1**.

3. CODE OF CONDUCT

- 3.1 We all confirm that we have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (**Code**) and have complied with the Code in the preparation of this statement. We agree to follow the Code of Conduct when participating in expert conferencing and any subsequent processes directed by the Expert Panel. We confirm that the opinions we express are within our areas of expertise and are our own, except where we state that we are relying on the work or evidence of others, which we have specified.

4. CONFIRMATION OF PREVIOUS REPORTS

- 4.1 Martin Peake confirms that he is the author the Technical Note dated 29 July 2025 (Annexure 2 to Auckland Transport's Specialist Memo dated 4 August 2025).
- 4.2 Craig Richards confirms that he is the author of the review dated 30 July 2025 (Annexure 1 to Auckland Transport's Specialist Memo dated 4 August 2025).
- 4.3 Martin Peake and Craig Richards stand by the analysis, conclusions and recommendations contained in their previous reports (which are not repeated), subject to:
- (a) The updated opinions expressed in **Section 5** of this statement, which are provided in response to the revised Application and updated information received from the Applicant in response to comments; and
 - (b) Any refinements or clarifications that may arise through the expert conferencing process.
- 4.4 As noted, Saul Vingrys has not previously prepared a report in relation to the Application. Saul provides his key opinions on PT-related issues / questions in this statement.

5. UPDATE AND SUMMARY COMMENTS ON ISSUES / QUESTIONS

5.1 In this section:

- (a) Martin Peake and Craig Richards provide updated opinions in response to the revised Sunfield Application and updated information received from the Applicant in response to comments, to assist discussions at conferencing.
- (b) Saul Vingrys provides his key opinions on PT-related issues/questions.

5.2 We have grouped our comments using the issues / questions set out in **both** the Applicant's and Council family's issues, together with the two additional issues identified at paragraph 19 of the Panel's Minute 13 dated 5 November 2025.

5.3 Council family issues are referenced "AC 5.x", while Applicant issues are referenced "App 5.x".

A. Trip Generation, Intersection Modelling and Required Upgrades

5.4 The following questions from the Council's and applicant's lists of questions are addressed together:

Has sensitivity testing been undertaken for key intersections to demonstrate the robustness of the assumed 3,000 peak-hour trip generation rate and clarify whether additional upgrades would be required if trip rates exceed this assumption?

Is there justification for the 2,845-dwelling trigger for the Mill Rd/Airfield Rd upgrade to confirm whether SIDRA modelling reflects the 3,000 vph trip rate with acceptable intersection performance? [AC 5.4]

Is the traffic modelling (undertaken by the Auckland Forecasting Centre at the request of Auckland Transport and NZTA and adopted by the Applicant), with associated conditions, appropriate and acceptable? [App 5.1]

5.5 There are a range of matters related to these questions, which the AT experts (Martin Peake and Craig Richards) would like to discuss at conferencing.

5.6 Is there updated traffic modelling to account for changes to internal / external road connections as discussed previously with AT?

- 5.7 Modelling of key internal intersections should be provided to confirm the layout of the intersections, including numbers of turning lanes, to demonstrate that there is sufficient footprint to form these intersections without affecting proposed lot boundaries. The removal of the bus way requires the redesign of the loop road and with the potential associated reduction in the proposed road reserve width, the assessment is required to confirm that sufficient space is provided to form intersections.
- 5.8 Is there a clear link between traffic modelling and the trigger points for all the required intersection/ roading upgrades? For example, as noted at AC 5.4, is there justification for the 2,845-dwelling trigger for the Mill Rd/Airfield Rd upgrade to confirm whether SIDRA modelling reflects the 3,000 vph trip rate with acceptable intersection performance? And is there justification for the triggers being specific to the residential land use and not considering other uses on the site, i.e. commercial?
- 5.9 It is also not clear whether the proposed review condition is robust enough to ensure that if trip generation exceeds the envisaged trip generation rate, it will identify and be addressed when and as appropriate. Note that triggers and mitigation should be investigated. Specific mitigation measures are required to address the effects of higher than expected trip generation in terms of the effects on the network and to manage the actual trip generation.
- 5.10 The applicant's list of issues includes the following question:

Are the resulting intersection / transport upgrades appropriate and acceptable? [App 5.1]

- 5.11 As discussed with Auckland Transport previously, the intersection / transport upgrades need to be appropriately conditioned in terms of staging, triggers, and other preceding upgrades required. At present, the conditions do not align with traffic modelling analysis and do not give adequate certainty that mitigation will be delivered as and when required.
- 5.12 All the intersection design and/or consent condition changes as discussed with AT previously need to have been considered and investigated, this includes:
- (a) Airfield Road / Road 1 intersection
 - (b) Airfield Road / Mill Road intersection
 - (c) New single intersection in lieu of the Cosgrave Road / Road 4 and Cosgrave Road / Bellbird intersection

- (d) Cosgrave Road / Clevedon Road intersection
- (e) Okawa Ave / Papakura-Clevedon Road intersection
- (f) Pakaraka Drive / Road 1 intersection
- (g) Ranfurly Road/ Alfriston Road intersection
- (h) Mill Road/ Popes Road intersection
- (i) Alfriston Road/ Mill Road intersection
- (j) Old Wairoa Road/ Porchester Road intersection
- (k) Ranfurly Road / Mill Road intersection
- (l) Walters Road / Porchester Road
- (m) Porchester Road / Kuaka Dr

- 5.13 Staging of the development needs to appropriately consider access to active modes and public transport, especially prior to the Sunbus being provided.
- 5.14 Vehicle tracking needs to be provided for the external intersections to be upgraded to demonstrate that the intersection footprints are feasible.
- 5.15 The ability to form the proposed Clevedon Road / Dominion Road intersection needs to be demonstrated as the footpath on the northwestern corner of the intersection extends outside of the road reserve boundary and into the adjacent reserve area.
- 5.16 Conditions 120 and 123 (and the corresponding conditions 175 and 176) need to be consistent in terms of the upgrades described and when they would occur. For instance, condition 123 Item I requires a signalised intersection at Road 1 / Old Wairoa Road / Pakaraka Drive for stage 4, whereas condition 120 does not. In addition, the upgrades are not all consistent with the applicant's previous advice. For instance, the Road 1 / Airfield Road intersection is described as a priority controlled intersection in condition 123 Item G, but the applicant has advised that the intersection will be signalised.
- 5.17 Conditions will be required to demonstrate how any interim intersection or roading arrangement will enable the final arrangement to be delivered and to identify what would trigger the need to provide the final arrangement and who would be responsible for that upgrade.
- 5.18 Measures are needed to demonstrate how the proposed left-out only operation of the Cosgrave Road / Road 4 intersection will be enforced whilst enabling other traffic movements.

B. Road design / Detailed information on the engineering design of roads and laneways

5.19 The following questions are similar and answered together:

Has it been demonstrated that all roads to vest have been designed to Auckland Transport's standards? Note: AT considers that aspects of the road design do not meet its standards, and it is unclear if there is sufficient legal width allowed for to meet these standards. [AC 5.5]

Have the designs of the roads and laneways been appropriately demonstrated and can these be finalised through conditions of consent? [App 5.8]

- 5.20 AT's experts do not consider it has been demonstrated that all roads to vest have been designed to AT's standards, and can accommodate the intended vehicles in terms of tracking. As captured in the 'Note' above, it is also unclear whether there is sufficient legal width to allow for this. We expand briefly on these matters below.
- 5.21 Vehicle tracking, particularly at key internal intersections, may affect lot boundaries. This has not been provided and should be provided to demonstrate that there is sufficient footpath print for the internal intersections.
- 5.22 The applicant has not provided the indicative location and types of all pedestrian crossing facilities. The indicative locations of pedestrian crossings on the internal roads to vest are required taking into account adjacent land uses and connections to development such as walkways and JOALS.
- 5.23 The applicant should investigate removing or moving the access to Road 1 / Road 2 / JOAL S3-7 to avoid an access into an intersection.
- 5.24 The applicant should review the form of the vehicle crossing at Chainage 1740 on Road 1 as this vehicle crossing is proposed to serve a significant number of lots and would likely operate as an intersection.
- 5.25 All laneways need to be provided with safe access points including visibility splays at high use vehicle crossings and JOALS. At present, details of visibility splays have not been provided. A proposed consent condition does refer to the provision of a visibility splay (Condition 129) but this does not reflect Auckland Transport's Practice Note 07 Vehicle Crossing Design

Standards. The applicant needs to provide the updated road design information based on previous discussions with AT. Note that specific reference is made to the internal arterial network which includes the suggested redesign of the bus lane.

- 5.26 It is not clear whether the applicant has considered all required interim intersection upgrades prior to the bus service/lane being provided.
- 5.27 Where interim intersection or road layouts are proposed, it will need to be demonstrated how those interim layouts would operate in the prior to the final layout and how and by whom they would be upgraded. The trigger for the upgrade to the final form would also need to be clearly identified.
- 5.28 Prior to the operation of a bus service within the development, details are required as to how the proposed bus lane will be treated. If the bus lane is to be used as a general traffic lane in the interim period, this could result in higher vehicle speeds and therefore potential safety implications.
- 5.29 All roads that terminate at a site boundary or a JOAL need to be provided with turning facilities. At present, there are locations where there are no turning heads provided (such as Roads 20, 21 and 22). These will be required to enable refuse trucks canturn around without using JOALs or vehicle crossings.
- 5.30 The turning head for Road 7 is located within the Mill Road designation. This will require approval from NZTA. Details should be provided as to how vehicles would be able to turn around following the construction of the Mill Road project at this location if no connection is formed between Road 7 and the new Mill Road.

C. Sunbus – Public transport integration

- 5.31 The first four questions below are drawn from the Council list of issues (AC 5.1):

What is the Sunbus operating model (public vs private) a, and will the Sunbus serve all resolved stops on routes to Takanini and Papakura? [AC 5.1]

- 5.32 The reference to “all resolved stops” in the above question would better read “bus stops”.

- 5.33 Confirmation is required as to whether the Sunbus will comply with AT's requirements in terms of accessibility, i.e. support mobility impaired users, particularly if this is to be an approved service, and whether Sunbus will operate throughout weekday and weekend, early mornings to late evenings. These are important matters that are not yet clear from the application material.
- 5.34 It is also not clear how long the developers intend to maintain Sunbus, whether and when it is planned to be handed over for AT to operate (should AT be prepared to operate the service in the future), and what are the associated capital and operational costs.
- 5.35 Confirmation is required on, if and how, additional capacity can be provided at Papakura or Takaanini Station to accommodate the high volume of shuttle buses proposed. This is not addressed in the application material and requires an assessment to identify the associated costs of funding solutions to accommodate the proposed volume of shuttles. The improvements may include minor changes such as extension of bus stops at Takaanini but also more extensive changes such as purchasing land at Papakura station to enable shuttle bus operation in the vicinity of the station.
- 5.36 The staging plan for introducing the Sunbus service is unclear and requires further clarification. Additional detail is also needed to explain how 3,500 people per hour can be accommodated with 88 Sunbus trips. Based on this volume, each bus would need to carry approximately 40 passengers per trip. Confirmation is required to ensure that the proposed buses will have sufficient capacity to realistically support the intended mode shift.

What contingency/monitoring arrangements are proposed to ensure continuity of service? [AC 5.1]

- 5.37 The above question refers to "continuity" of service, however it is also important to consider quality (i.e. level) of service.
- 5.38 Details are required of the level of service to be provided, is the current proposed level (40 buses with 40 people) feasible, how this is proposed to be measured, and what mitigation is required when and if service levels are not met. Additionally, integration with future AT services should be considered.

- 5.39 Evidence is needed to determine whether the high public transport mode share proposed for the Sunfield development has been successfully achieved in similar developments, either in New Zealand or internationally. This assessment should take into account that Sunfield is not located adjacent to a Rapid Transit Network (3-5 km away from Southern Line) and is expected to attract external trips from surrounding suburbs that may not have good access to the public transport network.

Does the Sunbus provide adequate coverage of the industrial precinct? [AC 5.1]

- 5.40 The location of routes of the Sunbus needs to ensure that the industrial precinct is within walking distance of bus stops and with appropriate pedestrian facilities to access bus stops.

Should the Sunbus trigger be based on dwellings occupied rather than constructed? [AC 5.1]

- 5.41 The proposed conditions (e.g. condition 176) would require Sunbus to be implemented at the completion of construction of 890 dwellings, on an assumption that at this point there would be 445 dwellings (50%) occupied. The appropriate trigger requires further consideration. The 'effect' will occur with the occupancy of dwellings rather than their completion.

- 5.42 The following question is drawn from the Applicant's list of issues:

Is the operation of a privately funded public transport service, with associated conditions, appropriate and acceptable? [App 5.7]

- 5.43 Detail is required on the associated capital and operational costs of operating and maintaining the fleet of Sunbus buses and on the lifespan of the Sunbus service.

- 5.44 Details are required to understand what would happen if the operator of the privately funded service went out of business or was no longer able to operate the service.

- 5.45 The following two questions are from paragraph 19 of the Panel's Minute 13.

Confirmation of the regulatory approvals already obtained to run the Sun buses on public roads, and details of any other regulatory approvals (if any) that will be required

- 5.46 It is assumed that this question is primarily directed at the applicant.

Whether upgrades will be required to the public transport nodes and how will these be facilitated

- 5.47 There has been no assessment by the applicant of the necessary upgrades to public transport nodes, and no specific upgrades are proposed by the applicant as far as we are aware.
- 5.48 A range of potential upgrades will be required not only at public transport nodes, but also on the road network. In the absence of any assessment by the applicant, at a high level, it is assessed that the following potential areas of upgrade to public transport nodes and the road network will need to be investigated.
- 5.49 At public transport nodes:
- (n) New and / or upgraded communication and technology infrastructure would likely be required at rail stations and bus stops to enable safe autonomous bus operation at these busy nodes (such as Vehicle-to-infrastructure technology and software such as RFID readers).
 - (o) Specific physical facilities are likely to be required to accommodate the Sunbus service (such as bus stops, shelters, signage, bus friendly kerbs). The extent of these facilities will depend on the proposed service frequency.
- 5.50 On the road network:
- (p) New and / or upgraded communication and technology infrastructure would likely be required along AT's roads to support autonomous vehicle navigation and operation.
 - (q) Physical and operational measures may also be required to support the bus services and frequencies (such as bus lanes, bus priority at signalised intersections).

D. Active modes

- 5.51 The Council's list of issues contains an issue relating to active modes, with the following question:

What legal mechanisms (e.g., easements, vesting, consent notices) will be implemented to guarantee that internal walking

and cycling linkages between neighbourhoods, roads, and parks remain publicly accessible in perpetuity?

Note: AT understands additional information is to be provided regarding active modes connections beyond the site (including to Takanini rail station). [AC 5.2]

- 5.52 AT's experts consider that further information / assessment is required from the applicant:
- a) Concerning the provision of updated active modes plans, as discussed previously with Auckland Transport, particularly in relation to the external road network.
 - b) Concerning the provision of active modes facilities at the Airfield Road/ Mill Road intersection, as discussed previously with Auckland Transport.
 - c) Demonstrating that the applicant has explored all required active mode connections between roads and other land uses.
- 5.53 External active mode connections are required, including links to the Mill Road / Airfield Road intersection and along Airfield Road west of Mill Road to connect to the existing shared path / footpath on the southern side of Airfield Road.

E. Parking enforcement / controlling the parking of private vehicles

- 5.54 The following questions are similar and answered together:

Noting that AT does not support developments where adverse traffic effects are to be mitigated by AT enforcing anticipated illegal parking, how will illegal car parking be sufficiently managed without reliance on AT enforcement? [AC 5.3]

Does the proposal, including associated conditions, appropriately control the parking of private vehicles? [App 5.3]

- 5.55 AT's experts are concerned that there is reliance on AT to enforce illegal parking to manage the effects of the development. Whilst it is acknowledged that the applicant does not have any jurisdiction to enforce car parking within the public road reserve, details are required as to what measures will be implemented to manage parking behaviour within the private areas and to minimise the potential for illegal parking within the road reserve.

- 5.56 The proposed review condition should be sufficiently robust to ensure that parking effects and its effects on trip generation will be identified and addressed when and as appropriate.
- 5.57 The applicant needs to consider the 3rd party approvals required for parking management, e.g. approval from AT for broken yellow lines or on-street loading bays.
- 5.58 The effects of additional traffic circulation while looking for parking need to be considered and addressed.
- 5.59 The applicant has advised that temporary parking areas will be provided in the initial stages of the development. The conditions do not set out the quantum of parking that could be provided or the triggers as to when that car parking would be removed. Providing the temporary parking could result in higher car ownership / usage by residents of those initial stages, which could be problematic when the temporary parking areas are removed and could result in higher trip generation rates.
- 5.60 Loading bays in residential neighbourhood areas at the scale proposed have onerous enforcement requirements and consideration is required as to how these will be effectively managed to ensure they are not used for general parking.

F. Impacts upon existing pavements / roads – Construction traffic

- 5.61 The Council's list of questions includes the following:

How will the anticipated damage to existing rural road pavements caused by heavy construction and earthwork traffic be mitigated, and what mechanisms will ensure these costs are not borne by Auckland Transport? [AC 5.6]

- 5.62 Given the majority of the development of the site has not been considered by AT when building roads or budgeting road maintenance, the effects of construction traffic would not have been taken into account when considering maintenance. Due to the scale of the development, the additional number of heavy vehicle movements could bring forward the need for maintenance.
- 5.63 The applicant has posed the following related question:

Do the proposed conditions (20 and 21) appropriately address potential impacts on the existing road network? [App 5.10]

- 5.64 The draft conditions referenced above are generic Construction Traffic Management Plan conditions, and are inadequate to address the potential scale of the issue. Specific conditions are needed to directly address the potential effects of construction on the existing road network across the entire development timeframe. Effects of construction and earthwork traffic can include, safety effects, congestion, and road pavement damages not anticipated in maintenance budgets.

G. Travel Demand Management Plan

- 5.65 The following questions are similar and answered together:

Is the proposed Travel Demand Management Plan (TDMP) for the Employment Precinct and Town Centre, and proposed condition, appropriate? [App 5.9]

Should the residential precincts be included in the Travel Demand Management Plan? [AC 5.7]

- 5.66 Residential precincts should be included in the TDMP, due to the scale of development and as the trip generation onto the external road network will be predominantly from the residential components of the development. It is noted that the applicant anticipates that the town centre will be predominantly used by residents and that some residents would also work in the employment precinct.
- 5.67 The removal of temporary parking facilities suggested by the applicant should be included in the TDMP to ensure that residents are aware of their removal and are informed of the required alternative travel choices.

H. Ardmore Airport

- 5.68 The applicant's list of issues includes several transport issues relating to Ardmore Airport.
- 5.69 The Ardmore Airport development includes an upgrade to the Mill Road / Airfield Road intersection. The effects of the Ardmore development on this intersection need to be understood and how this may affect the potential triggers for the upgrade of the intersection.
- 5.70 Has the applicant reached a conclusion in terms of how the proposal affects current and future access to Ardmore airport from Walters Road prior to Mill

Road Stage 2 being constructed? For example, the realignment of Hamlin Road.

DATED the 7th day of November 2025

Martin Peake

Traffic Engineer, Progressive Transport Solutions

Craig Richards

Traffic Engineer, Beca

Saul Vingrys

Public Transport Specialist, Auckland Transport

ATTACHMENT 1

Qualifications and Experience of Saulius Vingrys

1. I hold a Master's degree in Civil Engineering from Vilnius Gediminas Technical University in Lithuania (2011). I am a member of both the Transport Planning Society and Engineering New Zealand.
2. I have 16 years of experience in Transport Planning and Engineering with the focus on Transport Modelling and Public Transport Planning. I worked with several international engineering consulting firms before joining Auckland Transport in November 2025. My professional background includes projects across Lithuania, Poland, the UK, Qatar, Australia, and New Zealand.
3. I have contributed to major public transport business cases such as the Public Transport Improvement Business Case and the Future Ferry Programme Business Case. I have also played a key role in significant Auckland projects including the Northwest Rapid Transit Local Access Improvements and the Vehicle Kilometres Travelled Reduction Programme, where I was responsible for planning the future public transport network.
4. Since 2020, I have supported Auckland Transport through various secondments. These include leading the Network Recast project, which reshaped service levels to reflect post-COVID travel patterns, and leading the Operations Planning team, where I oversaw network capacity and operational efficiency.
5. At Auckland Transport, I serve as the Public Transport Network Development Manager.