tattico

Applicant Section 55 Planning Response Report – Sunfield Substantive Application – FTAA-2503-1039

16th October 2025

Tattico Limited
PO Box 91562, Victoria Street, Auckland 1142, New Zealand
Level 10, West Plaza Tower, 1-3 Albert Street, Auckland 1010
p. +64 9 973 4282 **f.** +64 9 973 4283
www.tattico.co.nz

Contents

Supporting Documents Provided

A. Summary of s53 Comments and s55 Applicant Response, dated 15 October 2025
B. Updated Set of Proposed Conditions, dated 15 October 2025
C. Updated Plans and commentary prepared by Studio Pacific, including:
    1. Masterplan, dated 27/08/2025
    2. Employment Precinct Concept Masterplan, Rev H, dated 11.08.25
    3. Employment Precinct – Design Controls, Rev H, dated 11.08.25
    4. Summary Urban Design and Parks Comments Table, dated 10 October 2025
    5. Residential Neighbourhood Plans
    6. Additional Open Space Plans, dated 10/10/2025
    7. Wai Mauri Stream Park Design Report, dated September 2025
    8. Open Space Strategy Report, dated October 2025
    9. Landform Plan, prepared by Maven
    10. Active Mode Plan, dated 10/10/2025
D. Joint Statement from Winton Land Limited and NZTA dated 14 October 2025
E. Engineering Plans, prepared by Maven, dated 10/10/25
F. Scheme Plans and Staging Plan prepared by Maven, dated 10/10/25
G. Economic Review Response Report prepared by Property Economics, dated 26th September 2025
H. Transportation Response Report, including Transportation Modelling Memorandum, prepared by Commute, dated 14 October 2025
I. Ecological Assessment prepared by Bioresearches, dated 29 September 2025
J. Airport Safety Memorandum prepared by L+R Airport Consulting, dated 4 September 2025
K. Noise Response Report, prepared by Styles Group, dated 9 October 2025
L. Addendum Geotechnical Assessment Report, prepared by LDE dated October 10, 2025
M. Earthtech Groundwater Peer Review, dated 26 September 2025
N. Stormwater and Flooding Response Report prepared by Maven
O. Updated Stormwater Modelling Report, Rev H, prepared by Maven, dated 10/10/25
P. Sunfield Development FTA Flood Model Peer Review Rev 1 prepared by CKL, dated 15/10/2025

Q. Erosion Risk Assessment, prepared by CKL, dated 10/10/25
R. Water Supply and Wastewater (Watercare) Response Memorandum prepared by Maven, dated XXX
S. Soil and Land Use Capability Memorandum prepared by Landsystems, dated 25 August 2025
T. Sunfield, NPS-HPL Assessment prepared by AgFirst, dated September 2025
U. Earthworks Response Report, prepared by Maven
V. Three Iwi Engagement Memorandums prepared by Navigator Limited, all dated August 2025

1 INTRODUCTION

I, Ian Smallburn of Tattico Limited, confirm that this memo was prepared in accordance with the Environment Court Practice Note 2023 (Code of Conduct for Expert Witnesses). Details of my qualifications and relevant experience have been provided to the Expert Panel previously.

This Planning Report (**response report**) is prepared on behalf of the applicant, Winton Land Limited, pursuant to section 55 of the Fast-track Approvals Act 2024 (**FTAA**) responding to the written comments received from invited parties pursuant to section 53 of the FTAA.

Comments were received from twenty-three parties, with a list of these parties and a summary of the respective comments and applicant responses contained within **Attachment A** – Summary of s53 Comments and s55 Applicant Feedback.

In preparing this response report, all the received comments have been reviewed and the feedback has been addressed based on themes, recognising there is overlap from a variety of parties.

The structure of this response report follows the below high-level outline, being:

- Amended Proposal – An overview of the proposal following amendments being made given the Notice of Requirement (**NoR**) alignment of the Mill Road – Stage 2 Corridor (**MR2**), and the subsequent change in potential effects.
- Planning Commentary – Consideration of the comments received, the potential adverse effects, and the regional and national benefits analysis.
- A summary of the updated set of proposed conditions, recognising the full set is contained within **Attachment B**.
- An assessment and analysis against the decision-making framework of the FTAA, following comments being received.

This response report relies on the originally submitted Fast-track application documentation (**original application**) lodged on 3rd April 2025, and the documentation submitted in response to Minute 3 of the Expert Panel on 17th July 2025 (**Minute 3 response**). Therefore, in line with section 10 of the FTAA, this response report focusses on differences of opinion, points of clarification, and the key matters requiring consideration.

2 EXECUTIVE SUMMARY

The Sunfield development (**Sunfield**) has been amended, in consultation with New Zealand Transport Agency (**NZTA**), due to the proposed location of MR2, which has led to a reduction in the development area by 19.4ha or 8% of the total Sunfield site, with the original application area comprising 244.5ha. The Employment Precinct has been removed from the NoR area meaning a reduction in size of 7.8ha, from 54.8ha to 47ha, which is approximately 14%.

In the majority of instances, the adverse effects from the proposal are reduced, primarily given the reduction in the development area. The amended proposal is therefore considered to be in scope of the original application with the adverse effects being of a similar scale, character and intensity.

The benefits assessment from the original application is still considered relevant and appropriate, noting that the amended proposal would result in a $70m reduction in net present value and approximately 500 fewer job years than the original proposal. Therefore, in total, the economic benefits equate to a total GDP impact of $3.1b and 24,000 FTE job years (rounded).

The potential adverse effects highlighted by invited parties and in contention have been reviewed and considered in the context of the legislative framework, and it is considered that there are no 'adverse impacts' in line with section 85(3), as the adverse effects can be managed to within acceptable levels.

Overall, it is therefore considered that Sunfield can be approved in accordance with section 81(1)(a) of the FTAA.

3 AMENDED PROPOSAL

3.1 Background

Amendments have been made to the original proposal, in order to align with MR2, a NZTA project which runs along the eastern boundary of the Sunfield development site. The NoR for the MR2 proposal was lodged by NZTA on 13th June 2025 pursuant to Section 168 of the Resource Management Act 1991 (**RMA**), approximately two months after the Sunfield substantive application was lodged under the FTAA. Mill Road is categorised as a 'Road of National Significance', which as outlined by NZTA are *'… a package of major transport projects that, will support economic growth and productivity, reduce congestion, improve safety, support housing development, and provide a more resilient roading network'.*[1] [Emphasis added]

Section 178 of the RMA states that from that date no person may do anything that would prevent or hinder the public work, project or work proposed under the NoR unless the person has the written consent of the requiring authority.

Therefore, following the NoR being issued, the applicant has engaged with NZTA and a revised Sunfield application is proposed (**amended proposal**). A joint statement from Winton Land Limited and NZTA regarding this engagement is contained within **Attachment D**, which outlines that a key focus of discussion has been the stormwater solution.

3.2 Proposed Amendments

The proposed amendments are highlighted within **Figures 1 and 2** below, with **Figure 1** illustrating the original proposal, and **Figure 2** illustrating the amended proposal. The amended proposal is illustrated in further detail within the updated Masterplan, Precinct Plans and associated Neighbourhood Plans, which are contained within **Attachment C**, along with the updated Engineering Plans, Scheme Plans and Staging Plan contained within **Attachments E and F**. The below provides a written summary.

[1] NZTA Website – Roads of National Significance – Link: https://www.nzta.govt.nz/planning-and-investment/roads-of-national-significance

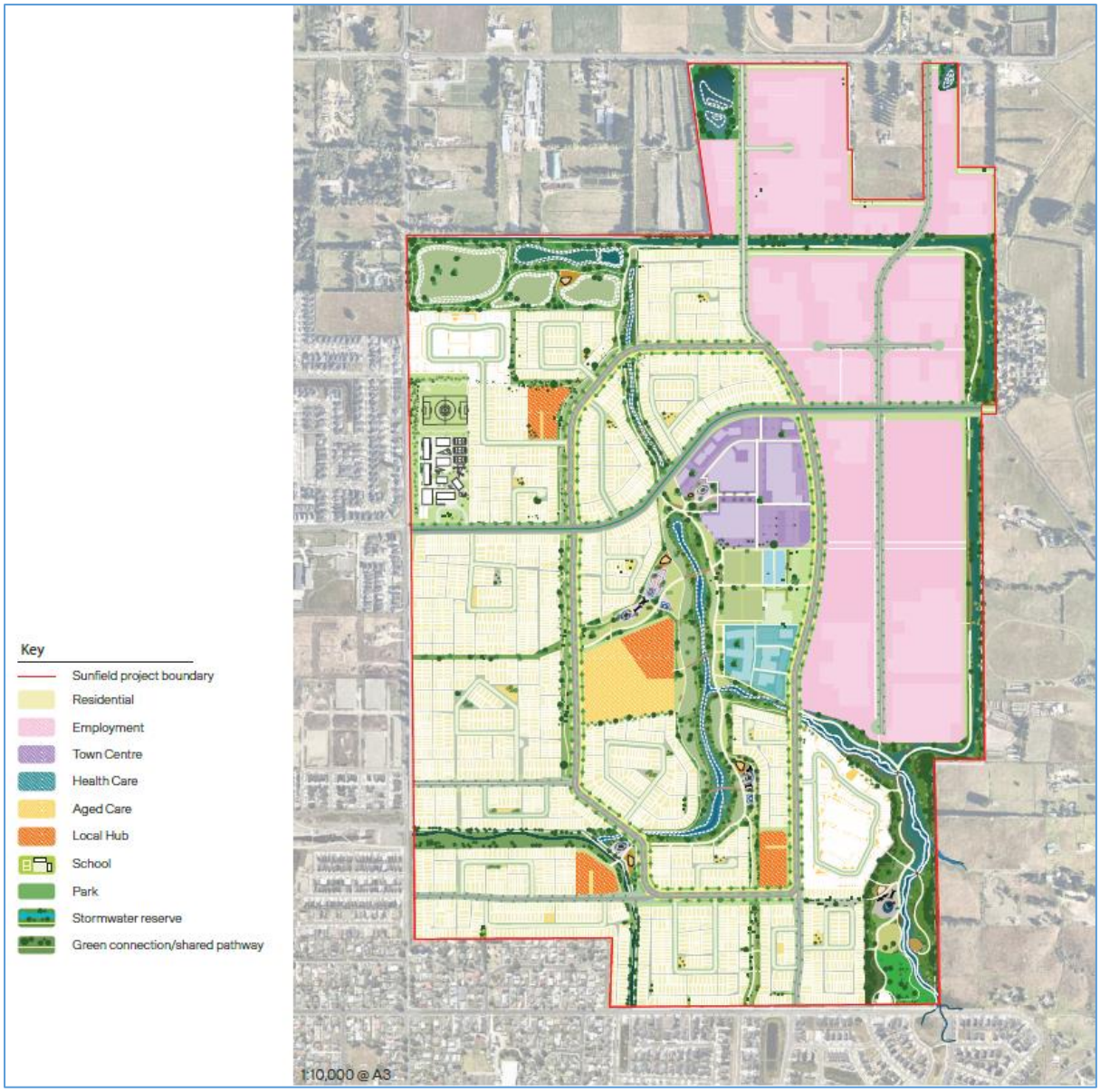

Figure 1: Originally Proposed Masterplan *(Source: Studio Pacific - Masterplan)*

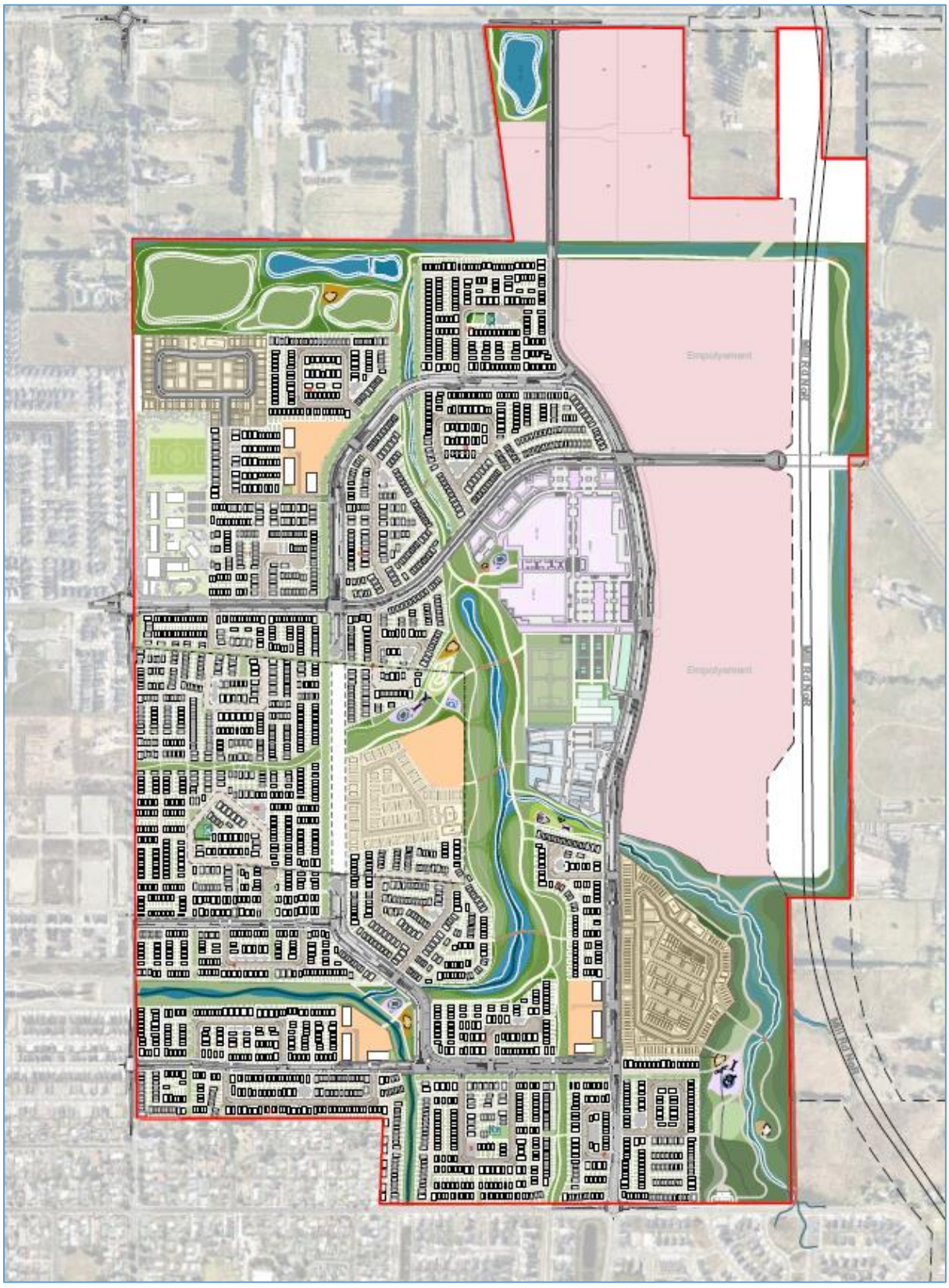

Figure 2: Amended Proposed Masterplan *(Source: Studio Pacific - Masterplan)*

3.2.1 MR2 Orientation and Layout

MR2 runs in a north-south direction along the eastern boundary of the subject site. In the north, it enters Sunfield in the north-eastern corner of the site at 80 Hamlin Road, where it adjoins Airfield Road, with a roundabout proposed in this location as part of the NoR. In the south, it enters the site at the southern boundary of 85 Hamlin Road. Within the subject site, the NoR varies in width due to the proposed alignment, intersection considerations, construction requirements and stormwater devices. The NoR therefore has an approximate width that varies between 83m and 153m. The total area of the NoR within the Sunfield development is 19.4ha or 8% of the total Sunfield site, with the original application area comprising 244.5ha.

Within the NoR area, the original proposal contained the Employment Precinct, and the Northern / Eastern Greenway which in turn contained a stormwater channel, associated planting and a footpath for pedestrians and cyclists. It is proposed to retain the Northern / Eastern Greenway and stormwater channel within the NoR which is anticipated to have a similar area as the original proposal post construction of MR2.

As outlined within the joint statement with NZTA (**Attachment D**), a key focus of discussion has been the stormwater solution, with it being considered that the stormwater conveyance channel within the NoR area can be physically constructed and would serve the Sunfield development, and the wider catchment area. NZTA may also elect to discharge into the stormwater channel in preference to its own channel as previously proposed, noting NZTA still intend to construct its own stormwater treatment infrastructure.

The Employment Precinct has been removed from the NoR area meaning a reduction in size of 7.8ha, from 54.8ha to 47ha, which is approximately 14% of the Employment Precinct and 3% of the overall Sunfield development area. **Figures 3** and **4** below illustrate the original proposal and amended proposal for the Employment Precinct.

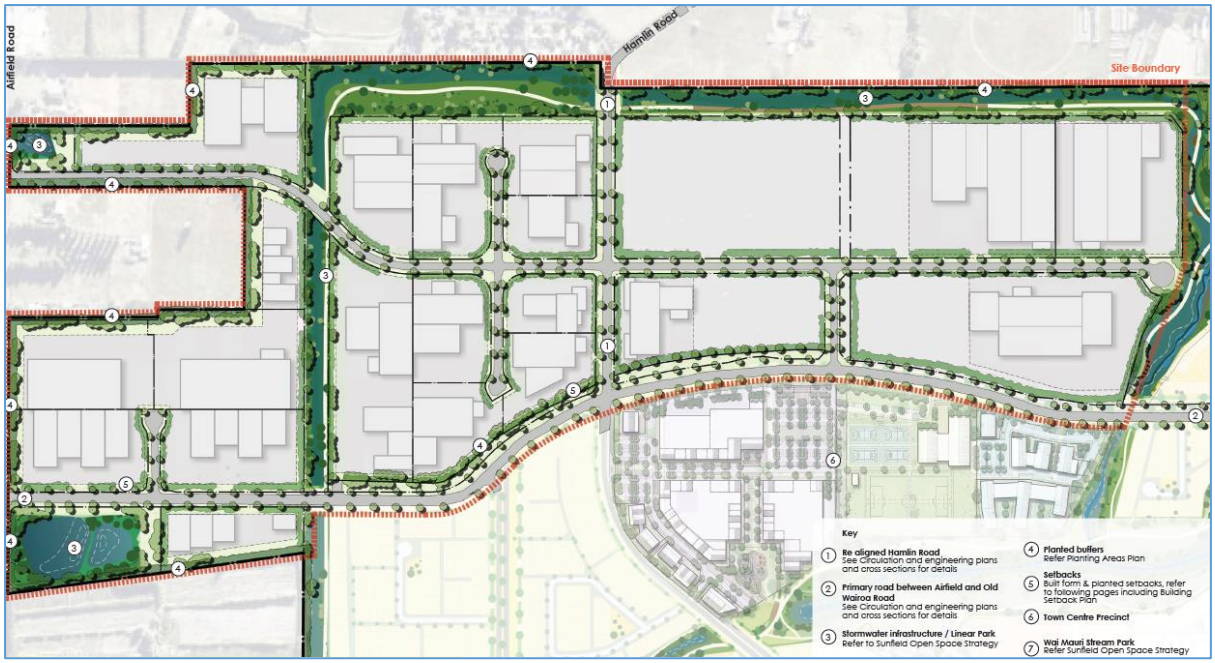

Figure 3: Originally Proposed Employment Precinct Masterplan *(Source: Studio Pacific - Masterplan)*

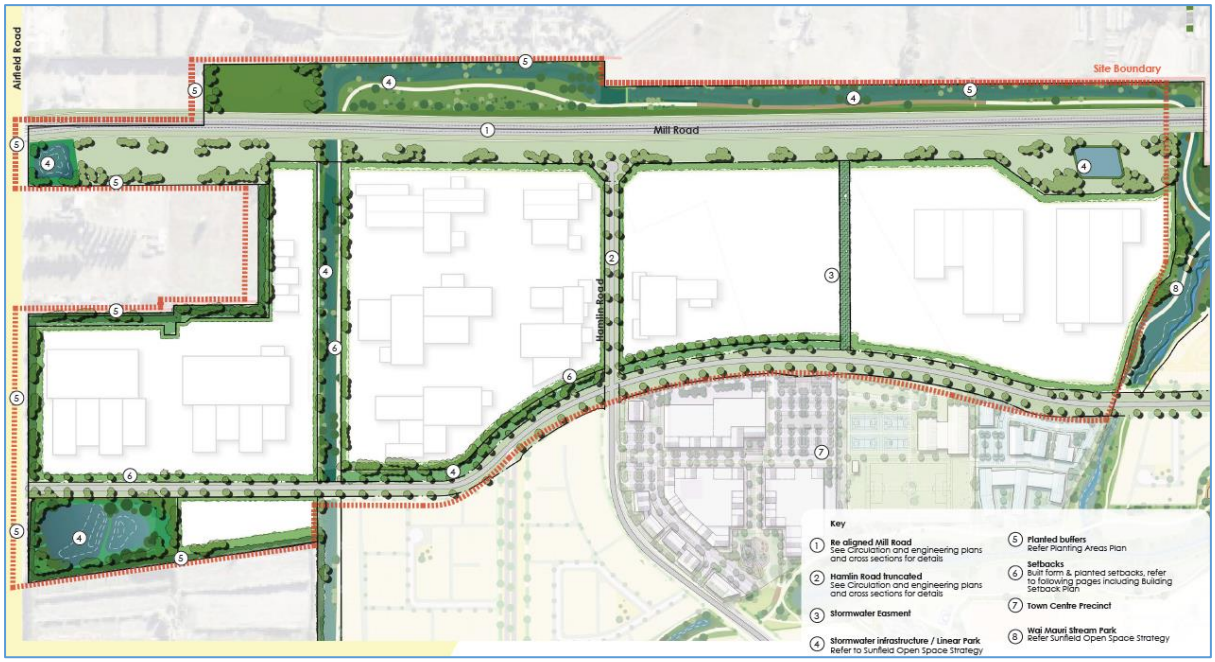

Figure 4: Amended Proposed Employment Precinct Masterplan *(Source: Studio Pacific - Masterplan)*

3.2.2 Roading and Access

The roading layout within the Employment Precinct has now changed, with the removal of Road 7, a north-south road which entered the site via Airfield Road and terminated at the southern end of the Employment Precinct adjacent to the Wai Mauri Stream Park.

The main east-west link of Hamlin Road through the Sunfield development is retained, with the smaller east-west connections and cul-de-sacs proposed to be removed. This will mean vehicular access to the Employment Precinct lots being gained via Road 1 and Hamlin Road (Road 6).

3.2.3 Waste Management

As a result of feedback from Auckland Council, and considering the proposal further, the waste collection proposal has been amended across the whole Sunfield development. As illustrated within the Neighbourhood Plans (**Attachment C5**), sites with frontage onto vested roads will be serviced by the Council collection services, and those sites without such frontage would be supported by a communal bin storage area and a private collection.

3.2.4 Building and Lot Layout

The super-lot layout for the Employment Precinct has changed with there being fewer super-lots, with a reduction from six to four. Lot 18, in the north-eastern corner of Sunfield has been removed to accommodate MR2. The proposed boundary orientation of the remaining lots are the same, with the eastern boundaries moving to the west creating slightly smaller lots. This has a small impact on the resulting building platforms, which are of a similar location and scale.

3.2.5 Stormwater Infrastructure

The stormwater channel and associated open space network remains largely unchanged, and follows the same alignment of the original proposal. Prior to the construction of Mill Road, this will mean a 11.6ha area of open space and planting along the eastern boundary, which will reduce post construction of MR2 to a similar area as per the original proposal.

An updated Stormwater Modelling Report has been prepared by Maven and is contained within **Attachment O**. This has been peer reviewed by CKL, which outlines that the modelling work undertaken is appropriate (**Attachment P**).

Note – By way of an update, the regional consents for the Awakeri Wetlands Stages 2 and 3 which were lodged in early July 2024, have recently been approved (3rd October 2025). The Awakeri Wetlands project and associated consents were outlined within section 2.9 of the original planning report.

3.2.6 Open Space Network

As outlined above in section 3.2.5 of this report, the proposed open space network remains largely unchanged, however, following feedback from Auckland Council's Parks team, three additional neighbourhood open space areas in the northern (1,109m^2), western (1,007m^2), and southern (1,145m^2) portions of Sunfield are proposed, as illustrated in **Figure 5** below, and as contained within **Attachment C6**.

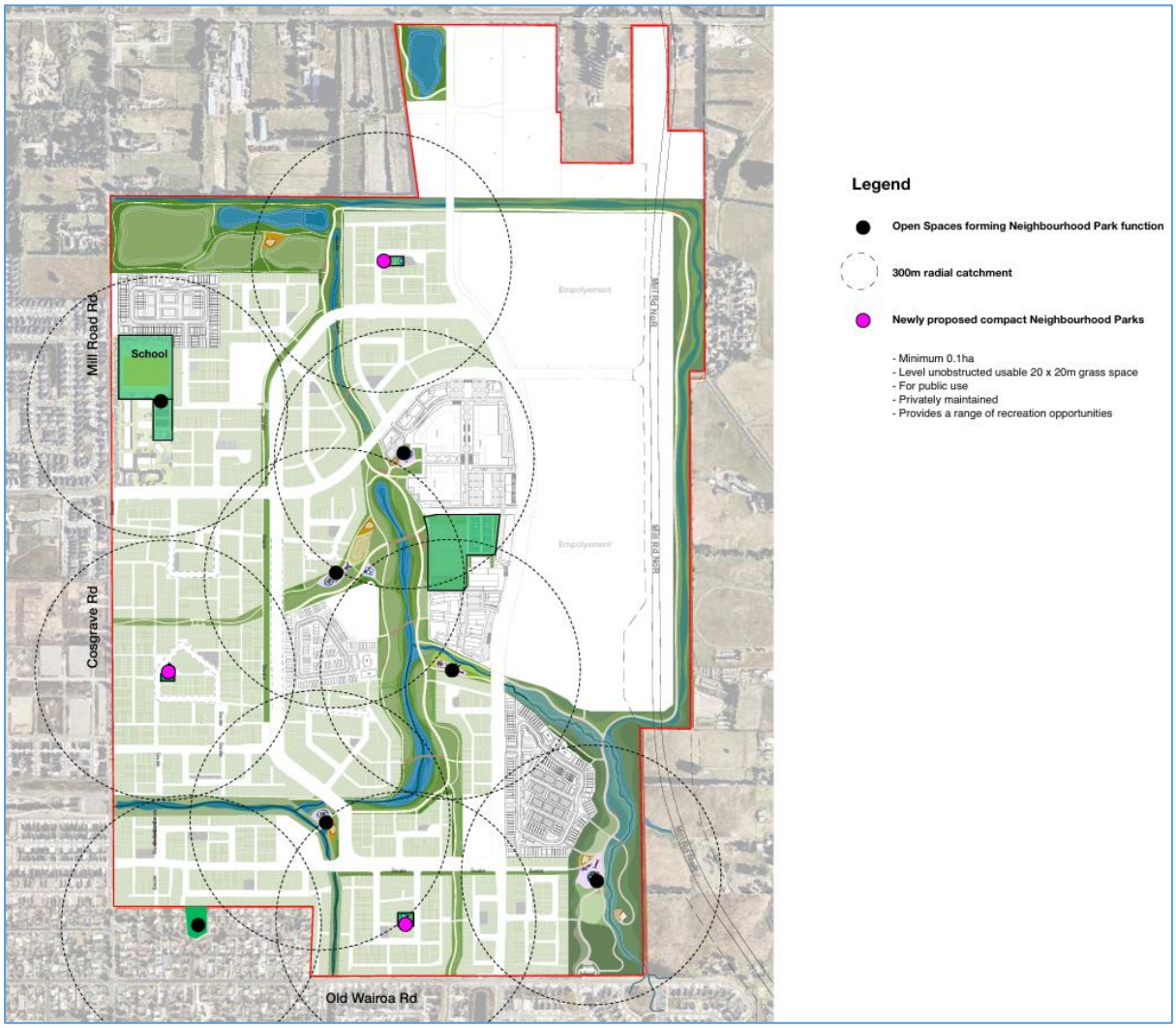

Figure 5: Open Space Distribution and Catchments *(Source: Studio Pacific)*

3.2.7 Wastewater Infrastructure

The proposed wastewater system has had a small amendment, although this is not as a result of MR2. The provision of wastewater storage on site within a public pump station is now proposed, which will allow

Watercare to maintain control of the discharge from the Sunfield development. This is outlined further within the Water Supply and Wastewater Response Memorandum from Maven (**Attachment R**)[2].

3.2.8 Earthworks

The amended proposal retains the same area and a similar volume of earthworks, as illustrated in **Figures 6** and **7** below, and summary in **Table 1**. This is due to the earthworks in the NoR area continuing to occur to ensure appropriate contouring for the Eastern Greenway and construction of the eastern stormwater conveyance channel. An Earthworks Response Memo, prepared by Maven, is contained within **Attachment U**.

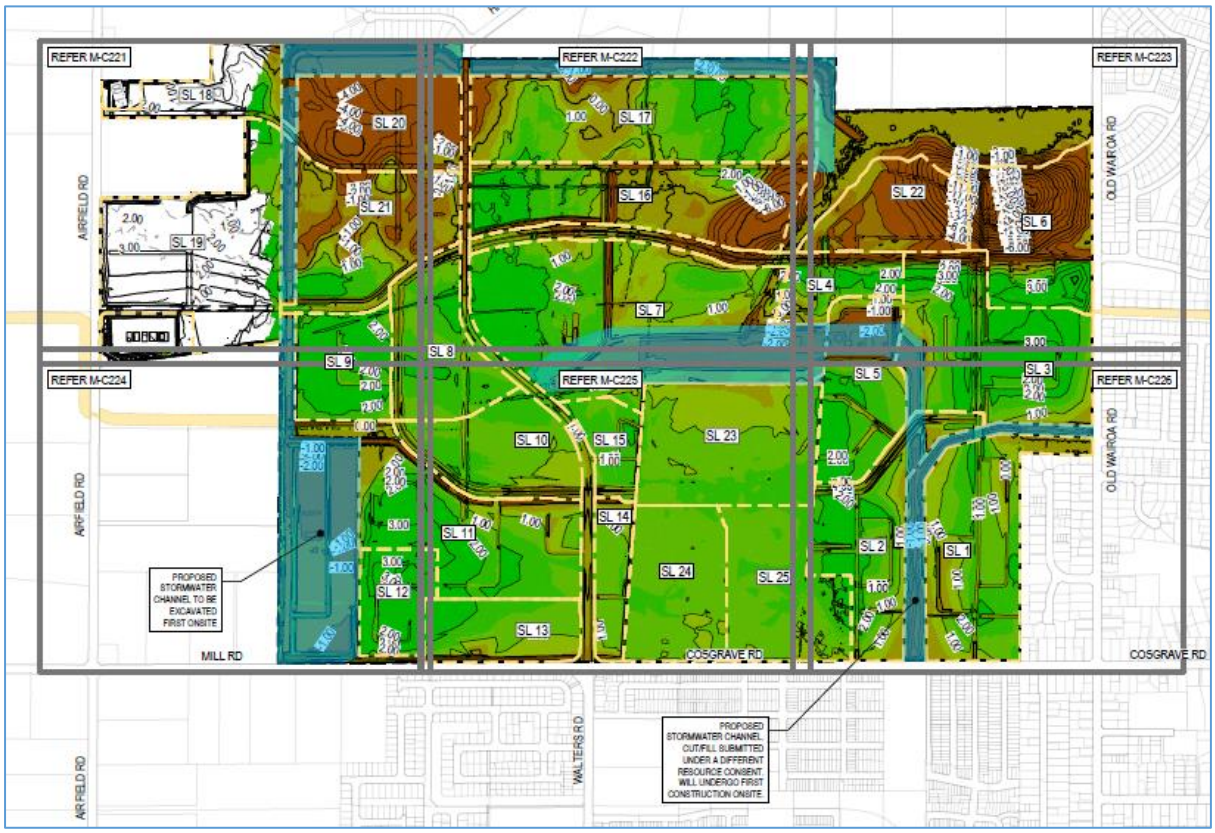

Figure 6: Originally Proposed Earthworks Plan *(Source: Maven)*

[2] Water Supply and Wastewater Response Memo – Attachment R – Page 7

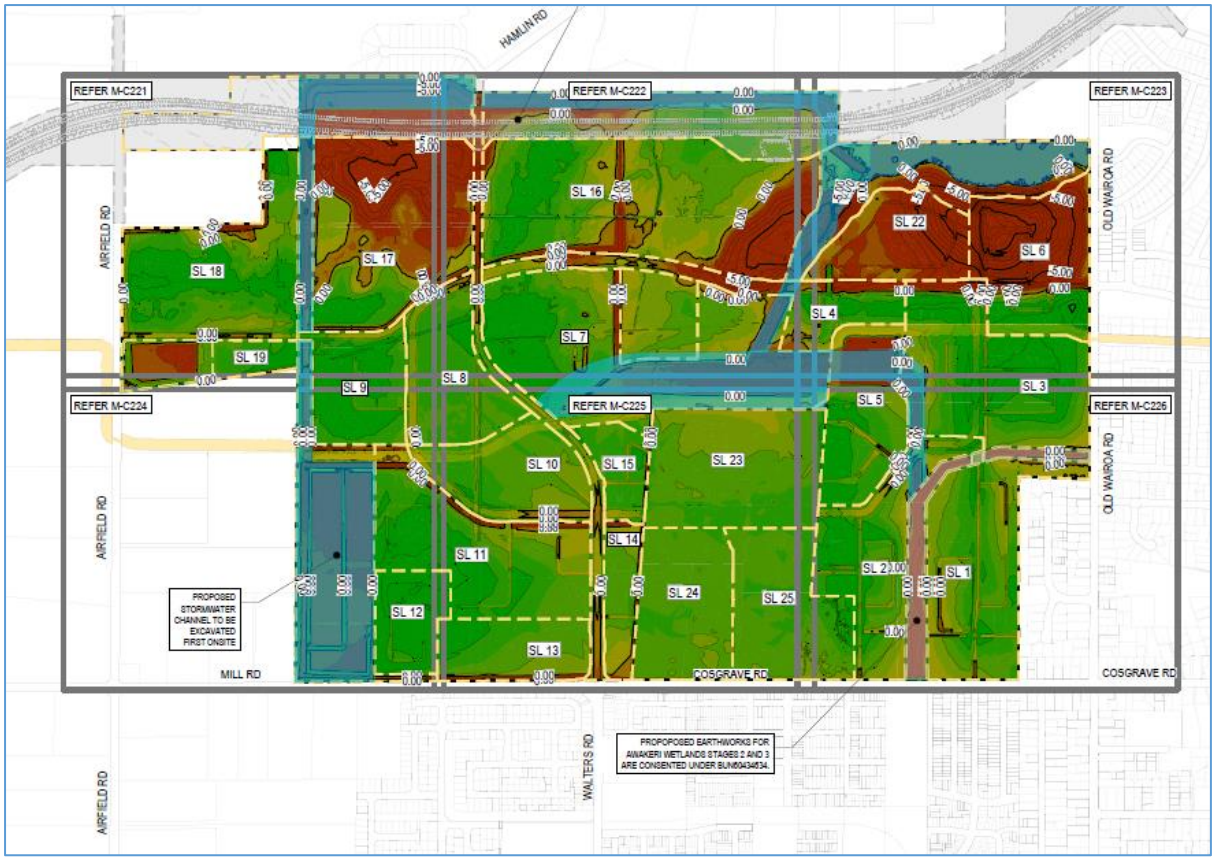

Figure 7: Proposed Earthworks Plan *(Source: Maven)*

Activity	Original Proposal	Amended Proposal
Total area of ground disturbance	= 244Ha	= 244Ha
Maximum cut and fill depth	= 18m cut & 6m fill	= 18m cut & 6m fill
Fill required (excludes preload)	= 1,490,000m^3	= 1,540,000m^3
Cut volume	= 1,700,000m^3	=1,760,000m^3
Bulk earthworks cut to fill (Including compaction factor of 0.8)	= 1,360,000m^3	=1,408,000m^3
Cut to fill of surplus material from services & drainage	= 100,000m^3	=100,000m^3
Total cut/fill volume (Sum of total cut + total fill)	= 3,290,000m^3	=3,400,000m^2
Net cut/fill balance (Fill Import)	= 30,000m^3	=32,000m^3
Preload (import) (Based on preloading one superlot at a time)	= 100,000m^3	=100,000m^3

Table 1: Earthwork Metrics *(Source: Maven)*

Given the size of the site at 244ha (2,440,000m^2), the change in earthworks volume is very small and comparable to the original proposal recognising that the larger areas of earthworks are in the same location in the north-east, south-east and supporting the construction of the proposed infrastructure.

3.2.9 Staging Plan and Scheme Plan

The staging plan for the proposed development has been reconfigured to take into account MR2, as illustrated in Figures 8 and 9.

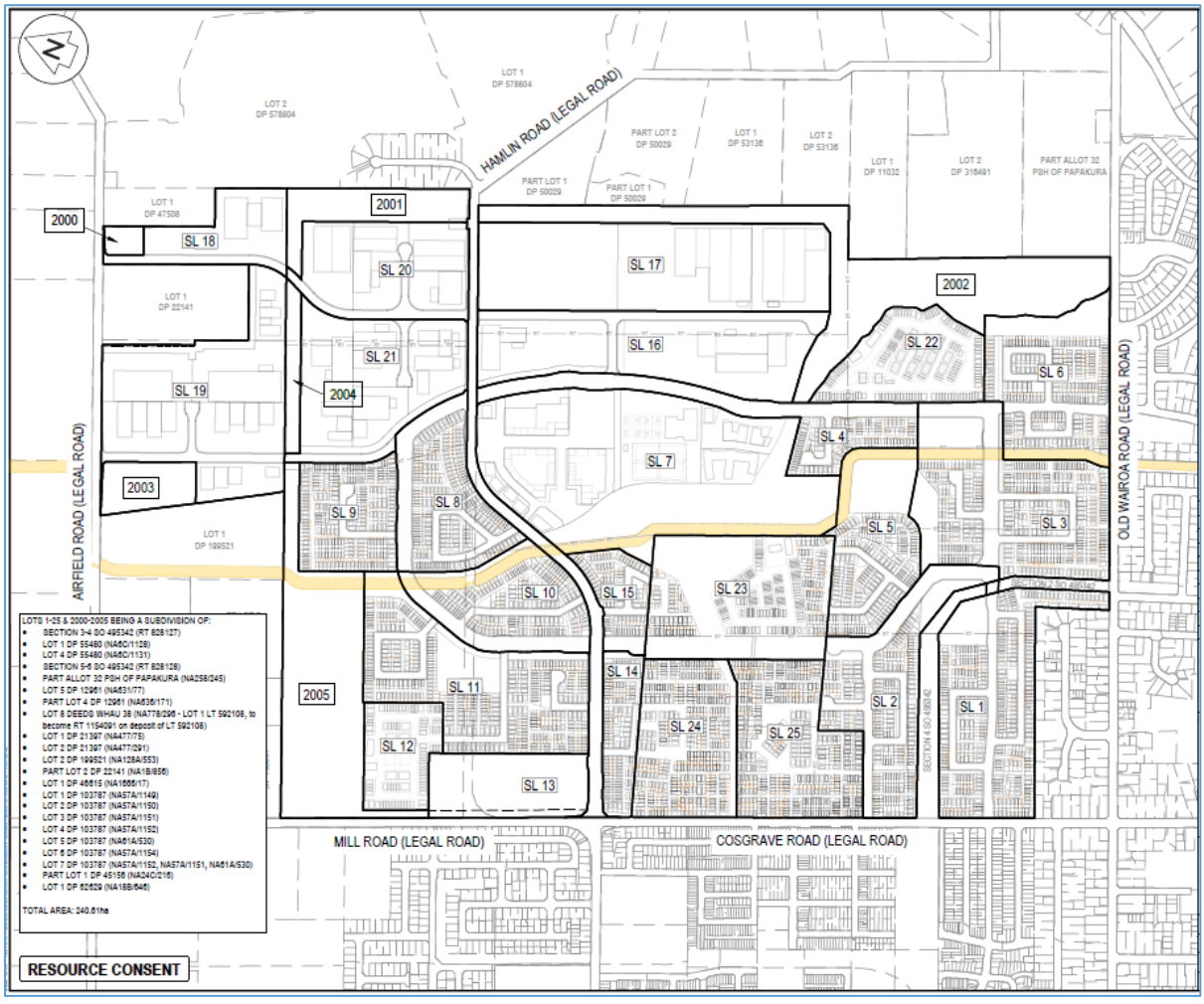

Figure 8: Originally Proposed Staging Plan *(Source: Maven)*

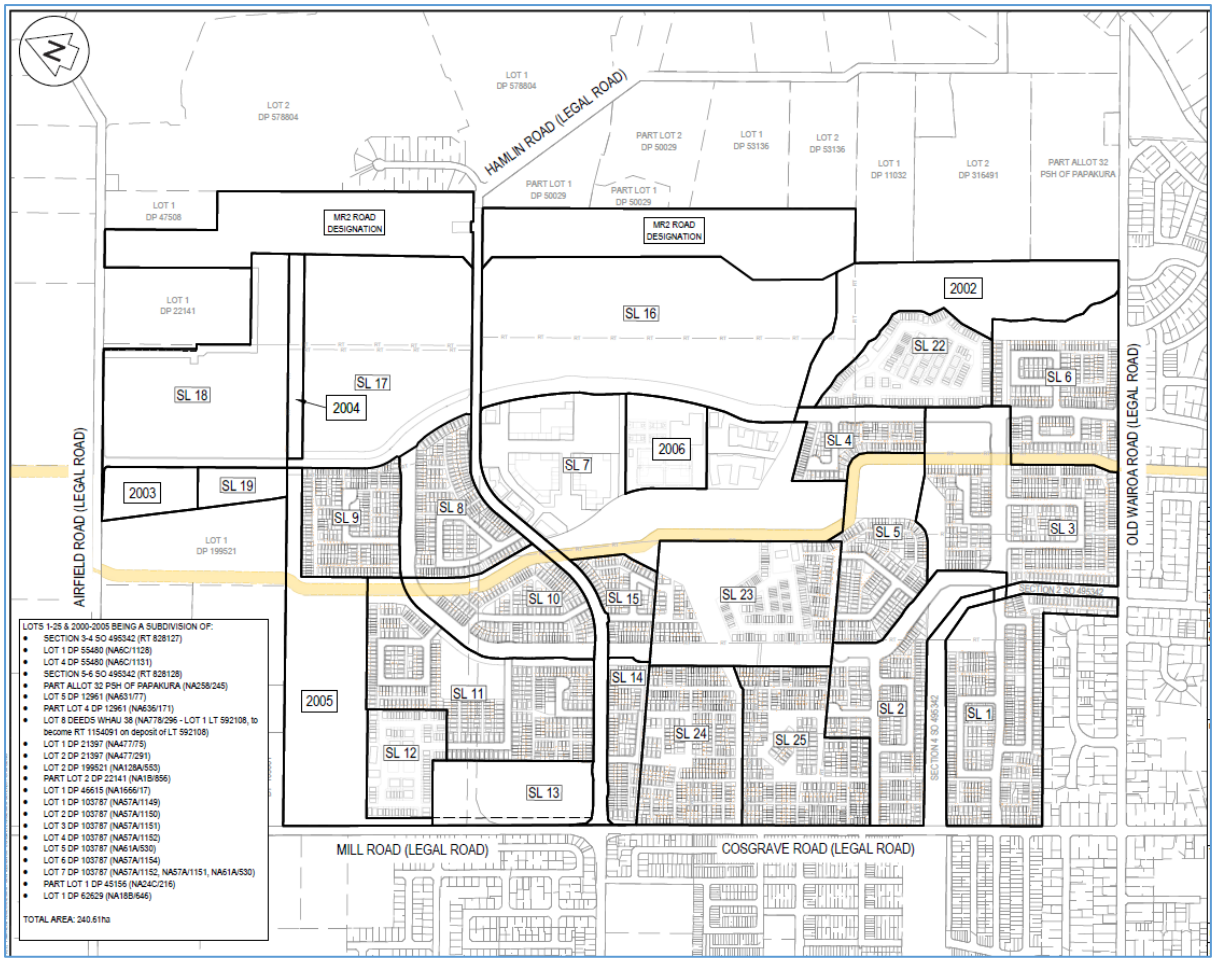

Figure 9: Proposed Staging Plan *(Source: Maven)*

The amendments to the staging plan have meant:

- the original stages 16 and 17 have been combined into stage 16.
- the original stages 20 and 21 have been combined into stage 17.
- the original stage 18 has been removed.
- the original stage 19 is now split into stages 18 and 19.

This has meant that in total there are 23 stages (previously 25 stages) and the respective staging conditions (120, 123, 175 and 176) have been updated to reflect these changes, with the updated set of proposed conditions contained in **Attachment B**.

3.3 Changes to Potential Effects

The proposed amendments will potentially change the nature and scale of the effects and impacts of the Sunfield development. In a general sense, the effects of the amended proposal will reduce, given the

reduced scale of the development. The below assessment provides an overview of the changes in effects, noting section 5 of this response report outlines the nature and overall extent of these adverse effects in line with the requirements of the FTAA, following comments being received from invited parties.

Whilst the below assessment outlines consequential impacts from MR2 on the Sunfield development e.g. the effects on the transport environment, the below does not assess the effects of MR2 itself, as those matters are to be addressed under the separate NoR process.

3.3.1 Effects Associated with Urban Growth

Section 7.1 of the original application outlines the effects associated with urban growth, and that this land is a logical greenfield area to develop. Sunfield is the next block to the east of the existing urban areas of Takanini and Papakura, and north of the urban area adjacent to Old Wairoa Road. This area of appropriate urban growth is then bordered to the west by Ardmore Airport (noting the development plans mentioned in their feedback), and to a lesser extent Hamlin Road/Airfield Road in the north. This therefore creates a logical expansion for growth adjacent to a significant existing edge of urban land.

The proposed location of MR2 further increases the logic of this area being developed into an urban area, with this corridor providing a clear and obvious edge between urban and rural activities. This will reduce the fragmentation of rural land, and ensure appropriate integration with the existing urban area.

Whilst this would be undertaken through a separate process, in due course MR2 is also considered to be an appropriate location for an amended Rural Urban Boundary (**RUB**) given this logical edge. There has been general discussion at a national policy level on the future of RUBs, but it is repeated that this application is not dependent on the location of the RUB, with the proposal needing to be assessed against the statutory requirements of the FTAA.

3.3.2 Character and Amenity

The character and amenity effects associated with the proposed changes are similar to the original proposal, noting the land area reduction of 7.8ha or 14% within the Employment Precinct being 3% of the overall Sunfield development area, and in turn buildings with a collective smaller gross floor area. This translates into less building bulk, and reduced vehicle movements to and from Sunfield.

Open space connections will continue to be provided within this area, both in a north-south and east-west direction, particularly the Eastern Greenway along the eastern edge of the Sunfield development which also

acts as a buffer to the rural environment and Ardmore Airport further east. This will ensure that the open space connections continue to operate as a collective series of networks, which have the environmental benefits of managing stormwater, significant riparian planting, and creating an interconnected green network providing access to the different precincts via active modes of transport.

3.3.3 Economic Impact

The economic impacts and benefits have been outlined within the Economic Review Response Report contained within **Attachment G**. These have been considered in greater detail within the benefits analysis under section 4 of this report, however, in regard to the specific changes to the economic impacts as a result of the amended proposal, the Economic Review Response Report states:

'Furthermore, the economic benefits of the Sunfield project are derived from a range of elements within the masterplan. The economic benefits lost solely as a result of a 14% reduction of land in the employment hub component is estimated at a net present value of $70m with a loss in job years of approximately 500. As a proportional loss for the Project as a whole, this compares with a total GDP impact of $3.1b and 24,000 FTE job years (rounded).'[3]

This change is negligible in recognition that as part of the original application, Property Economics considered that total economic impact on business activity within Auckland as a result of the Sunfield development over the same time period is estimated to be around $3.2 billion with 24,700 FTE jobs.

3.3.4 Flooding and Stormwater

Maven have provided an updated Stormwater Modelling Report (**Attachment O**) which outlines that the proposed stormwater strategy continues to achieve the required flood mitigation outcomes. In regard to the amendments arising from the MR2 NoR, the Maven Stormwater and Flooding Response Report (**Attachment N**) states:

'Importantly, the stormwater strategy has been developed in coordination with key stakeholders, including the New Zealand Transport Agency (NZTA), in response to the Notice of Requirement (NoR) for the Mill Road Stage 2 (Takanini Section) ("MRS2A") Project. The proposed stormwater infrastructure has been designed to be compatible with the MRS2A corridor and can support a coordinated, catchment wide solution should this be progressed. This includes an internal perimeter diversion channel that aligns with the preliminary strategy

[3] Economic Response Report – Property Economics – Attachment G – Section 6

outlined by Healthy Waters and integrates with the MRS2A proposal, ensuring long-term resilience and integration with future infrastructure.'[4]

It is therefore considered that the stormwater strategy, and in turn stormwater impacts, remain consistent with the original proposal noting the proposed internal perimeter diversion channel remains as part of the proposal.

3.3.5 Wastewater and Water

There will be a reduced demand on the water supply and wastewater networks given the total amount of developable land is reducing by approximately 7.8ha or 14% within the Employment Precinct. In comparison to the original proposal, this will result in a reduced building footprint and in turn demand for services.

3.3.6 Transportation

The change in transportation effects as a result of the proposed amendments have been assessed within the Transportation Response Report, contained within Attachment H.

The Employment Precinct will have a reduced land area of 7.8ha, which equates to 14%, being 3% of the overall Sunfield development area. This reduction in developed land area will result in a reduction in traffic generation and in turn reduced potential adverse effects. As stated within the Transportation Response Report:

'The total for the employment precinct is therefore 325-450 movements in the peak hour. This is 69-95 less than that in the ITA.'[5]

3.3.7 Productive Land

The proposed Sunfield development is being reduced by 19.4ha. The entire subject site is classed as highly productive land as per the National Policy Statement – Highly Productive Land (NPS-HPL). The area being removed from the original proposal has soils classed as LUC 2s4, LUC 2w2, LUC 2e5 and LUC 3w2. Therefore, the effects on highly productive land between the original and amended proposal are negligible, although are effectively reduced due to a smaller land area proposed to be developed.

[4] Stormwater and Flooding Response Report – Mavem – Attachment N – Executive Summary – Page 1
[5] Transportation Response Report – Commute – Attachment H – Section 5.2.3 – Page 23

3.3.8 Ecology

The ecological effects from the amended proposal will not change from the original proposal, noting the volume and area of earthworks within the 19.4ha impacted area will not materially change, and in turn the impact on streams and vegetation will remain the same. This has also been confirmed within the Ecological Assessment contained within **Attachment I**.

3.3.9 Reverse Sensitivity (Ardmore Airport)

The location of the proposed corridor for MR2, and the subsequent setback of the Sunfield development from Ardmore Airport to the east creates a greater separation distance (83m to 153m) and a new buffering land-use. Whilst the NoR process needs to run its course, this will be a strip of land with rural characteristics prior to MR2 being implemented, and a four-lane major road post construction of MR2.

The effects from the proposed amendments are similar to the original proposal, given the land-use response, and the location of activities, buildings and roads remain largely unchanged. The only proposed change will reduce the potential reserve sensitivity effects, as Road 7 is proposed to be removed. This was a north-south road running through the Employment Precinct which entered the site via Airfield Road and terminated at the southern end of the Employment Precinct adjacent to the Wai Mauri Stream Park. This therefore reduces the amount of human activity and potential lighting and glare levels within the 'Protection Areas' of Designation 200 – Ardmore Airport.

A memorandum is provided from L+R Airport Consulting and is attached as **Attachment J**, which states regarding the amended proposal:

'We are also aware of the Notice of Requirement which has been lodged on a part of the Sunfield Development for a section of Mill Road Stage 2 by NZTA. The construction of this section of Mill Road Stage 2 in its proposed location does not affect the findings of the L+R Safeguarding Report.'

In regard to noise effects, the amended proposal does not change the nature and extent of the noise effects, with the layout of land-use activities within Sunfield remaining consistent and in line with the respective noise control boundaries. The proposed mitigation measures also remain.

3.3.10 Reverse Sensitivity (Rural)

Section 7.14 of the original application outlines the potential reverse sensitivity effects given the proximity of rural land to the east of the proposed urban land. This assessment concluded that the reverse sensitivity effects can be appropriately managed due to the design and activity layout of Sunfield, with the open space network and the employment precinct acting as an appropriate buffer to residential activities further west.

As outlined under section 3.3.9 of this report, the proposed corridor for MR2 and subsequent setback of Sunfield will create a greater separation distance, of between approximately 83m and 153m and a new buffering land-use between Sunfield and the rural activities to the east.

This will therefore reduce the potential for reverse sensitivity effects to occur as rural activities such as machinery noise, spraying of vegetation and stock control will be further away from the Employment Precinct, which itself will have an anticipated lower level of amenity than say residential land-use.

3.3.11 Earthworks (Groundwater / Contamination / Landform / Stability / Sediment and Erosion and Dust)

As outlined under section 3.2.8 of this report, the volume and area of earthworks for the original and amended proposal are very similar. The earthworks in the area impacted by MR2 will continue to occur to ensure appropriate contouring for the Northern / Eastern Greenway and construction of the eastern stormwater conveyance channel.

The potential adverse effects associated with such an activity will therefore be marginally greater given the comparatively small increase in the volume of earthworks proposed, with the effects associated with groundwater, contamination, landform, site stability, sediment and dust having been addressed in the original application and through numerous proposed conditions of consent.

3.3.12 Change in Effects Summary

Given the recently lodged NoR, the amended proposal for Sunfield will result in a reduced land area of approximately 19.4ha, of which there will be a 7.8ha (14%) reduction in the Employment Precinct with the balance being used as part of the stormwater channel. Overall, the effects from the amended proposal are reduced or will be of a similar scale, character and intensity to that of the original proposal, noting:

- The developed area of land within the Employment Precinct will be further from the neighbouring boundaries, particularly the rural land and Ardmore Airport to the east.

- The character and amenity effects associated with the amended proposal will remain consistent with the original proposal, noting the land-use activities within the development will not change, and the proposed layout of the development will remain largely consistent.
- Effects associated with earthwork activities will remain consistent given the small increase in the volume of earthworks.
- Ecological effects will remain the same, with the effect on streams, and wetlands not being altered.
- The reduction of the development area within the Employment Precinct will mean a reduction in traffic generation and vehicle movements.
- The reduced building footprint will in turn reduce the demand on the wastewater and water supply networks.
- Although discussed further under section 4 of this report, the economic impact changes will be negligible.
- The stormwater strategy, and the use of an internal perimeter diversion stormwater channel remains as part of the amended proposal.

3.4 Reasons for Consent

The proposed amendments to the design and layout of Sunfield have the potential to result in a change to the reasons for consent and/or the respective exceedances. In addition, following Minute 3 of the Expert Panel, and reviewing the section 53 feedback responses, clarity is required on the reasons for consent, notwithstanding the application is a non-complying activity overall.

The below table outlines the reasons for consent, and supersedes section 5.2 of the original application. The final column on the right outlines the change, if any, from the original application.

CHAPTER H18 – Future Urban Zone		
Table H18.4.1 Activity Table	**Activity Status**	**Change – Original / Amended**
(A2) New buildings, building additions and accessory buildings	**Same status that applies to land use activities**	No change
(A28) Dwellings that do not comply with Standard H18.6.8	**Non Complying**	No change
(A38) Restaurants and cafes not otherwise provided for	**Discretionary**	No change
(A47) Care centres for more than 10 people	**Restricted Discretionary**	No change
(A48) Community Facilities	**Discretionary**	No change
(A48) Healthcare Facilities	**Discretionary**	No change
(A48) Education Facilities	**Discretionary**	No change
(A54) Organised Sport and Recreation	**Restricted Discretionary**	No change

C1.7. Retirement Village (not provided for)	**Discretionary**	Omission from the table within the original application, noting proposed retirement village.
C1.7. Retail Activities (not provided for)	**Discretionary**	Omission from the table within the original application, noting retail to be located within the Local Hubs.
C1.7. Commercial Services (not provided for)	**Discretionary**	Omission from the table within the original application, noting businesses which sell services to potentially be located within the Local Hubs.
H18.6 Development Standards	**Performances**	**Change – Original / Amended**
H18.6.3 Yards (20m Front - arterial, 10m - front, 12m – side or rear, 20m – riparian)	The development will infringe these controls = **restricted discretionary** activity	No change
H18.6.8 Dwellings – No more than 1 per site	The development will infringe this control = **restricted discretionary** activity	No change

CHAPTER H19 – Rural – Mixed Rural Zone		
Table H19.8.1 Activity Table	**Activity Status**	**Change – Original / Amended**
(A12) Disposal of non-residential waste that does not comply with H19.10.1(1) and (2)	**Discretionary**	No change
(A16) Rural commercial services	**Restricted Discretionary**	No change
(A21) Rural industries	**Restricted Discretionary**	No change
(A26) Dwellings	**Refer to H19.8.2 (A78)**	No change
(A36) Restaurants and cafes not otherwise provided for	**Discretionary**	No change
(A45) Care Centres for more than 10 people	**Restricted Discretionary**	No change
(A40) Storage and lock up facilities	**Discretionary**	No change
(A46) Community Facilities	**Discretionary**	No change
(A47) Healthcare Facilities	**Discretionary**	No change
(A48) Education Facilities	**Discretionary**	No change
(A52) Organised Sport and Recreation	**Restricted Discretionary**	No change
(A78) Dwellings not otherwise provided for	**Non complying**	No change
C1.7. Industrial Activities (not provided for)	**Discretionary**	No change
C1.7. Retail Activities (not provided for)	**Discretionary**	Omission from the table within the original application, noting retail to be located within the Town Centre.
C1.7. Commercial Services (not provided for)	**Discretionary**	Omission from the table within the original application, noting businesses which sell services to be located within the Town Centre.
C1.7. Retirement Village (not provided for)	**Discretionary**	Omission from the table within the original application, noting proposed retirement villages.

C1.7. Office Activities (not provided for)	**Discretionary**	Omission from the table within the original application, noting offices to be located within the Town Centre.
C1.7. Entertainment Facilities (not provided for)	**Discretionary**	Omission from the table within the original application, noting entertainment facilities to be located within the Town Centre.
H19.6 Development Standards	**Performances**	**Change – Original / Amended**
H19.10.3 Yards (20m Front - arterial, 10m - front, 12m – side or rear, 20m – riparian)	The development will infringe these controls = **restricted discretionary** activity	No change
H19.10.10 Dwellings – No more than 1 per site	The development will infringe this control = **restricted discretionary** activity	No change

CHAPTER E39 – Subdivision		
Table E39.4.1	**Activity Status**	**Change – Original / Amended**
E39.4.1(A5) Subdivision for an esplanade reserve	The proposal requires resource consent for a **restricted discretionary activity.**	No change
E39.4.1(A6) Subdivision for an esplanade reserve	The proposal requires resource consent for a **discretionary activity.**	No change
E39.4.1(A11) Subdivision for open space, reserve or road realignment	The proposal requires resource consent for a **discretionary activity.**	No change
E39.4.1(A13) Subdivision not complying with E39.6.5.1 (Minimum average site size and minimum site size)	The proposal requires resource consent for a **Non-complying activity.**	No change
E39.4.3(A28) Subdivision for open space, reserve or road realignment	The proposal requires resource consent for a **Discretionary activity.**	No change
E39.4.1(A29) Any other subdivision not complying with E39.4.1 or E39.4.3	The proposal requires resource consent for a **Non-complying activity.**	No change

CHAPTER E3 – Lakes, rivers, streams and wetlands		
Table E3.4.1 Activity Table	**Activity Status**	**Change – Original / Amended**
(A19) Diversion of a stream to a new course and associated disturbance.	The proposal requires resource consent for a **discretionary activity.** Watercourse 1, 3 and 4, and the upper stretch of 2 will be diverted as part of the proposal.	Omission from the table within the original application. Updated following query from Auckland Council (Minute 3 Response).
(A33)	The proposal requires resource consent for a **discretionary activity.**	Omission from the table within the original application. Updated

Culverts more than 30m in length when measured parallel to the direction of water flow.	Road 1, Culvert 2 has a length of 35.83m and involves the modification of Watercourse 2.	following query from Auckland Council. (Minute 3 Response)

CHAPTER E8 – Stormwater Discharge/Diversion		
Table E8.4.1 Activity Table	**Activity Status**	**Change – Original / Amended**
E8.4.1(A11) Discharge of Stormwater to land from a new stormwater network	The Project includes discharge of stormwater. Accordingly, the Proposal requires resource consent for **discretionary activity**.	Note that the Stormwater Network Discharge Consent is not being relied upon for this development.

CHAPTER E9 – Stormwater quality – High contaminant generating car parks and high use roads		
Table E9.4.1 Activity Table	**Activity Status**	**Change – Original / Amended**
E9.4.1(A6) Development of a new or redevelopment of an existing high contaminant generating car park greater than 5,000m^2 is a controlled activity.	The proposal involves 21,000m^2 of high contaminant generating carparks in three separate car parks, and accordingly is a **controlled activity**. It is proposed to comply with the controlled activity standards contained in E9.6.2.1.	Omission from the table within the original application. Updated following query from Auckland Council (Minute 3 Response).

CHAPTER E11 – Land Disturbance – Regional		
E11.4.1 Activity Table – All Zones and Roads	**Activity Status**	**Change – Original / Amended**
(A5) Earthworks greater than 50,000m2	The proposed earthwork is across an area of 244 hectares and accordingly is a **restricted discretionary activity.**	No change
CHAPTER E12 – Land Disturbance – District		
E12.4.1 Activity Table – All Zones and Roads	**Activity Status**	**Change – Original / Amended**
(A6) Earthworks greater than 2,500m^2 are to be assessed as a restricted discretionary activity	Earthworks across an area of 244 hectares are proposed and accordingly, resource consent for a **restricted discretionary activity** is required.	No change
(A10) Earthworks greater than 2,500m^3 are to be considered as a restricted discretionary activity	Earthworks involving 3,400,000m^3 are proposed, and accordingly, resource consent for a **restricted discretionary activity** is required.	Small increase in volume from 3,290,000m^3 to 3,400,000m^3.

CHAPTER E15 – Vegetation Management and Biodiversity		
Table E15.4.1 Activity Table	**Activity Status**	**Change – Original / Amended**
(A18) Vegetation removal within 20m of a wetland.	The proposal requires resource consent for a **restricted discretionary activity.**	Omission from the table within the original application.

CHAPTER C– General Rules		
Rule C1.7 – Activities Not Provided For	**Activity Status**	**Change – Original / Amended**
(C1.7(1)) Activity not otherwise provided for which includes any activity not otherwise provided for as part of the proposal.	Aspects of the proposal will require resource consent for a **discretionary activity**	No change

AUCKLAND-WIDE: CHAPTER E27 – Transportation		
E27.4.1 Activity table	**Comment**	**Change – Original / Amended**
(A3) Any activity or subdivision which exceeds the trip generation standards set out in Standard E27.6.1 is a restricted discretionary activity	The proposal is for: • a residential development of greater than 100 dwellings. • education facilities for primary school (167 students). • office space greater than 5,000m^2. • retail greater than 1,667m^2. • warehousing and storage greater than 20,000m2. • other industrial activities 10,000m^2. Accordingly, resource consent for a **restricted discretionary activity** is required.	No change
E27.6 Development standards	**Performance**	**Change – Original / Amended**
1. Trip generation Where a proposal exceeds 100 dwellings, resource consent for a restricted discretionary activity is required.	Restricted discretionary activity resource consent required.	No change

CHAPTER E30 – Contaminated Land		
Table E30.4.1 Activity Table – All zones and roads	**Activity Status**	**Change – Original / Amended**
(A6) Discharges to land from land subject to contamination	The contamination assessment (refer Document 32) concludes that the proposed works will require a **restricted discretionary and discretionary** activity resource consent under the Auckland Unitary Plan.	No change
E30.6.1 Development Standards	**Performance**	**Change – Original / Amended**
.4 Discharges of contaminant into air, or into water, or onto or into land from land not used for rural production activities (1) For in-situ soil and fill material, the concentrations of contaminants (relevant to the site's history) in soil or fill material, or the 95% upper confidence limit of the mean, determined in accordance with the Ministry for the Environment Contaminated Land Management Guidelines No. 5 – Site Investigations and Analysis of Soils (Revised 2011), must not exceed: (a) the criteria specified in Table E30.6.1.4 Permitted Activity Soil Acceptance Criteria; or (b) for contaminants not in Table E30.6.4.1: … (a) The natural background levels for that soil or fill material or the relevant background levels specified in Table E30.6.1.4.2 Background ranges of trace elements in Auckland soils sources from Table 3 of TP153: 2001 Background Concentrations of Inorganic	Focus Environmental have prepared a PSI, DSI, SMP and RAP. A **restricted discretionary** activity resource consent is considered to be required under this standard.	No change

Elements in Soils from the Auckland Region. (2) Any discharge from land containing elevated levels of contaminants must not contain separate phase liquid contaminants including separate phase hydrocarbons.		

CHAPTER E36 – Natural Hazards and Flooding		
4.1 Activity table	**Performance**	**Change – Original / Amended**
E36.4.1(A41) Overland Flow Path Diversion Diverting the entry or exit point of any overland flow path	This is proposed as part of the proposal. Accordingly, resource consent is required for a **restricted discretionary activity**.	No change
E36.4.1(A42) Buildings or Structures within an Overland Flow Path Any buildings or structures within any overland flow path	This is proposed as part of the proposal. Accordingly, resource consent is required for a **restricted discretionary activity**.	No change
E36.4.1(A37) Flood plain areas – 1% AEP All structures and buildings within the 1% AEP floodplain	This is proposed as part of the proposal. Accordingly, resource consent is required for a **restricted discretionary activity**.	No change
E36.4.1(A51) All other buildings and structures on land subject to instability	Resource consent is required for a **restricted discretionary activity**.	No change

CHAPTER E40 – Temporary Activities – Table 11		
4.1 Activity table	**Performance**	**Change – Original / Amended**
(A24) Specific temporary activities that are not provided as a permitted activity in rules (A12) to (A23) are a restricted discretionary activity	The proposed construction duration will exceed the 24-month limit for a permitted activity as provided for under Rule (A20). Accordingly, resource consent is required for a **restricted discretionary activity**.	No change

CHAPTER E7 – Groundwater Diversion		
E7.4.1 Activity table	**Performance**	**Change – Original / Amended**
(A28) Diversion of groundwater caused by any excavation, (including trench) or tunnel	This requires a **restricted discretionary activity**.	Originally applied for, but further clarity provided following LDE Report, **Attachment L**.

that does not meet the permitted activity standards or not otherwise listed.		
E7.6.1.6 Dewatering or groundwater level control associated with a groundwater diversion permitted under Standard E7.6.1.10, all of the following must be met:	**Performance**	**Change – Original / Amended**
(1) The water take must not be geothermal water;	**Complies**: There is no evidence of geothermal activity at the site	Further clarity provided following LDE Report, **Attachment L**.
(2) The water take must not be for a period of more than 10 days where it occurs in peat soils, or 30 days in other types of soil or rock; and	**Infringes**. The groundwater take will be permanent.	Further clarity provided following LDE Report, **Attachment L**.
(3) The water take must only occur during construction.	**Infringes**. The groundwater take will be permanent.	Further clarity provided following LDE Report, **Attachment L**.
E7.6.1.10. Diversion of groundwater caused by any excavation, (including trench) or tunnel	**Performance**	**Change – Original / Amended**
(2) Any excavation that extends below natural groundwater level, must not exceed: (a) 1ha in total area; and (b) 6m depth below the natural ground level.	**Infringes**. Excavations in the eastern corner of the site are shown to be more than 1ha and will extend more than 6m below the natural ground level.	Further clarity provided following LDE Report, **Attachment L**.
(3) The natural groundwater level must not be reduced by more than 2m on the boundary of any adjoining site.	**Complies**. The maximum expected potential drawdown resulting from the proposed excavations is approximately 1.1m.	Further clarity provided following LDE Report, **Attachment L**.
(4) Any structure, excluding sheet piling that remains in place for no more than 30 days, that physically impedes the flow of groundwater through the site must not: (a) impede the flow of groundwater over a length of more than 20m; and (b) extend more than 2m below the natural groundwater level.	**Complies**. No structure physically impedes the flow of groundwater is proposed.	Further clarity provided following LDE Report, **Attachment L**.
(5) The distance to any existing building or structure (excluding timber fences and small structures on the boundary) on an adjoining site from the edge of any:	**Complies**. The proposed excavations are generally centralised in the site (i.e. excavations extending below natural groundwater level are positioned well away from site	Further clarity provided following LDE Report, **Attachment L**.

(a) trench or open excavation that extends below natural groundwater level must be at least equal to the depth of the excavation;	boundaries). The point of maximum expected potential drawdown (MH13) is located more than 25m from the nearest boundary, and the point of maximum proposed cut anywhere on site is located approximately 200m for the nearest site boundary.	

CHAPTER D24 – Ardmore Airport – Table D24.4.2		
4.3.1 Activity table	**Performance**	**Change – Original / Amended**
(A13) A new single dwelling in 65dBLdn	**Discretionary activity**	No change
(A14) New activities sensitive to aircraft noise 60dB to 65 dB	**Discretionary activity**	No change
(A15) New activities sensitive to aircraft noise 60dB to 65 dB that do not comply with standard D24.6.2(1) and D24.6.2(5)	**Non complying activity**	No change
(A20) New activities sensitive to aircraft noise 55dB to 60 dB	**Restricted Discretionary activity**	No change
(A21) New activities sensitive to aircraft noise 55dB to 60 dB that do not comply with standard D24.6.2(1) and D24.6.2(5)	**Non complying activity**	No change
(A26) Subdivision within 65dB area with permanent legal mechanisms to avoid the establishment of additional activities sensitive to noise	**Discretionary activity**	No change
(A27) Subdivision within 65dB area without permanent legal mechanisms to avoid the establishment of additional activities sensitive to noise	**Non complying activity**	No change
(A26) Subdivision between 60-65dB and 55-60dB	**Restricted Discretionary activity**	No change

National Environmental Standards for Freshwater 2020 (NESF)		
Original	**Amended**	**Change – Original / Amended**
Earthwork activities and vegetation clearance for the restoration of the natural inland wetland are generally not intended to occur within 10m of the natural inland wetland, however, it is anticipated that a small amount of earthworks and vegetation	Earthwork activities and vegetation clearance for the restoration of the natural inland wetland are generally not intended to occur within 10m of the natural inland wetland, however, it is anticipated that a small amount of	Further clarity provided following Ecology Assessment Report, Page 7, **Attachment I**.

clearance may occur within this 10m threshold. This is a **restricted discretionary** activity pursuant to regulation 39 of the NESF, as the area of earthworks may be in excess of the lesser of 500m^2 or 10% of the area of the natural inland wetland. This has been applied for out of an abundance of caution.	earthworks and vegetation clearance may occur within this 10m threshold. This is a **permitted** activity pursuant to regulation 38 and 55 of the NESF.	
The construction of a wetland utility structure (footpaths, boardwalks and bridges) is proposed to occur within the natural inland wetland within Wai Mauri Stream Park. Regulation 42 of the NESF states that the construction of a wetland utility structure is a **restricted discretionary** activity when vegetation clearance or earthworks/land disturbance is required within 10m of a natural inland wetland.	No change	No change

National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 (NESCS)
The original application provided a contamination report (Document 32), which contains a number of PSIs (Preliminary Site Investigation), DSIs (Detailed Site Investigation), and a covering report providing an over-arching summary. There is no change to the consent requirements as a result of the amended proposal, with the area and volume of earthworks remaining unchanged. The proposed works include land that is 'a piece of land' that is acknowledged to have had an activity or industry described in the Hazardous Activity and Industry List (HAIL) which is likely to have been undertaken on the land. The results of the DSIs conclude that elevated concentrations of contaminants, and therefore the regulations of the NESCS will be triggered by future residential development of the properties at 508 Old Wairoa Road, 80 Hamlin Road and 279 Airfield Road. As per regulation 10 of the NESCS, this is a **restricted discretionary** activity. The regulations of the NES are triggered as a **discretionary activity**, as per regulation 11 of the NESCS, as future residential development of the remaining properties of Sunfield will occur for which DSIs have not yet been conducted, with PSIs not stating that it is highly unlikely that there will be a risk to human health.

As outlined within the original application, overall, the proposal is a **non-complying activity**, meaning all effects can be considered.

3.5 Scope

Consideration of whether the amended proposal is within scope of the originally submitted proposal is covered within the legal memorandum from Bronwyn Carruthers KC, noting that in summary it is considered that the amended proposal is within scope of the original proposal as:

a) The proposal is not a materially different proposal given:

- The area being removed from the proposal is a contiguous area of land adjacent to the eastern boundary, meaning the Sunfield development does not become fragmented.
- The proposal remains of a significant scale, with the area of development land impacted being 7.8ha or 3% of the overall 244.4ha Sunfield proposal.
- The location of the particular activities, precincts and infrastructure within the Sunfield development remain largely unchanged.

b) The adverse effects from the proposal are known given the original proposal, and in the majority of instances the proposed amendments reduce these adverse effects.

c) The feedback period for Sunfield was initiated on 7th July 2025 and closed on 4th August 2025, after the NoR for MR2 was issued, meaning MR2 was a known matter. Having reviewed Minute 2 of the Expert Panel dated 7th July 2025 which outlines the parties invited to provide feedback, it is considered that other additional parties would not have been identified to provide feedback as a result of the amended proposal.

d) The reasons for consent have been addressed under section 3.4 above, and are considered to be within the parameters of what was originally applied for, noting that the original proposal and amended proposal are both non-complying activities overall. This therefore means that all effects are to be considered under the subject application, with the original application assessing these accordingly.

4 BENEFITS ASSESSMENT

4.1 Introduction

The benefits of the project were outlined in the original application, primarily sections 6.1.4 and 7.3 of the Planning Report, and within the Economics Assessment undertaken by Property Economics (Document 16). It is noted that not all benefits are economic benefits, as there are a number of wider benefits which are non-economic components. To summarise from the original application:

- The Sunfield proposal will deliver a development project with significant regional benefits, with a total economic impact on business activity within Auckland to 2044 estimated to be around $3.2 billion (Net Present Value)

- Nominal expenditure from Sunfield would result in a $4.68 billion economic impact on capital expenditure.

- Around 24,700 full time equivalents employed over the development period to 2044.

- The proposal would add 3,854 much needed healthy homes to the southern Auckland market.

- A comprehensive and significant engineering solution has been developed to manage the stormwater that affects the Property. This solution takes the form of an extension to the existing stormwater conveyance channel that has been designed to provide an overall stormwater solution.

- The Awakeri Wetlands not only provides a functional / practical infrastructure solution for stormwater across the entire Property but also creates ecological benefits and a quality public asset in the form of an attractive public space including a boardwalk network along the edge of the channel. A regional consent has recently been granted for Stages 2 and 3 of Awakeri Wetlands.

- Sunfield will provide its own public transport service through the Sunbus autonomous electric vehicle shuttle fleet providing connections throughout the development and to the rail stations in Papakura and Takanini, indicating the scale of the proposed development.

- A number of roading network and infrastructure upgrades are proposed within the surrounding area, which are to be funded by the applicant.

- Sunfield will provide a sustainable and environmentally friendly 15-minute neighbourhood, meeting the needs of communities with Sunfield considering all aspects of life and integrates housing, employment opportunities, amenity and open space to enable neighbourhoods to become more self-sufficient.

4.2 Section 53 Comments

Comments on the benefits of Sunfield have been received, predominantly from Auckland Council. The comments have primarily focussed on the methodology for calculating the economic benefits, as opposed to providing an assessment of the economic benefits themselves.

In summary, the comments from Auckland Council suggest a cost-benefit analysis is a more appropriate methodology than an economic impact analysis, and that the outlined benefits are overstated.

4.3 Applicant Section 55 Response

Consideration of the section 53 comments outlined above have been undertaken, within both the legal memorandum from Bronwyn Carruthers KC, and an Economic Review Response from Property Economics in **Attachment G**.

The Economic Review Response outlines:

a) There is no explicit requirement of the FTAA to undertake a cost-benefit analysis.

b) The Economic Impact Assessment illustrates the level of economic activity that would result in the development.

c) A cost-benefit analysis is expensive, complicated and requires assumptions against non-financial matters, similar to the planning assessment of the FTAA.

d) Cost-benefit assessments are routinely used for comparative assessments for options analysis, be it policy or development (particularly infrastructure) proposals. These types of assessments are not subsequently used in the RMA decision-making process. Using a cost-benefit analysis under the FTAA would therefore be more prohibitive than the RMA, which goes against the intent and purpose of the FTAA.

e) Contrary to the Auckland Council view, the level of employment generated by the proposal is a vital consideration of the economic significance, and in turn, the overall level of significance of the project's benefits.

f) The examples of significance put forward by Auckland Council represent inappropriate benchmarks under which no application for housing in Auckland would be considered to generate significant benefits.

In summary, the Economic Review Report states:

'After considering the points raised in the Review (Auckland Council)*, Property Economics stands by the approach taken and considers this provides the most appropriate information to evaluate the economic benefits of the Project under the FTAA.'*[6]

It is therefore considered that when undertaking the 'proportionality test' or 'balancing assessment' under section 85(3), a cost-benefit analysis is effectively built into the legislation, as the adverse impacts are weighed up against the project's regional or national benefits. If a cost-benefit analysis was undertaken at the benefits assessment stage prior to the proportionality assessment, it could be argued that this constitutes 'double-dipping' as the same adverse impacts would be considered twice. This would go against the intent and purpose of the FTAA to facilitate the delivery of infrastructure and development projects.

With regard to the Council review, it is also noted that:

a) The Auckland Council comments also outline that the proposed development is one of the largest comprehensive development proposals the Council has ever received[7], however, the comments do not appear to express any potential benefits of the Sunfield development.

b) The Auckland Council comments also go on to state that the 3,854 dwellings proposed within Sunfield represents 0.14% of the approximate 2.8 million plan-enabled dwellings under the recently withdrawn Plan Change 78 (PC78)[8]. It should be clarified that these calculations were not rigorously tested through that plan change process, recognising there are various constraints across the city impacting development potential. These numbers also relate to 'plan-enabled' dwellings with the

[6] Economic Response Report – Property Economics – Attachment G – Summary
[7] Memorandum of Strategic and Planning Matters for Auckland Council – Para 133
[8] Memorandum of Strategic and Planning Matters for Auckland Council – Para 335

likelihood of this total capacity being taken up being close to, if not, zero. There are a variety of factors determining whether a site is developed, with the main driver being a potential applicant's desire. With the Sunfield proposal, the applicant is a reputable developer, who has shown a great deal of commitment to ensure the 3,854 dwellings are constructed.

c) The general guidance from Treasury, as outlined within the Auckland Council Economic Review[9], on the comparison of an economic impact assessment versus a cost-benefit analysis is noted, however, the methodology of the benefits assessment for this application, particularly the economic benefits, should be in line with the requirements of the legislation and not general guidance.

As outlined within the legal memorandum, the assessment under the FTAA does not require a cost-benefit analysis, noting that significant economic benefits are just one way a project may have 'significant regional or national benefits', with the Ministry for the Environment outlining in the initial assessment of the project that regional benefits would occur.

As outlined under section 3.3.3 of this report, the 14% reduction of land within the employment precinct will result in a $70m reduction in net present value and approximately 500 fewer job years from the original proposal. Therefore, in total, the economic benefits equate to a total GDP impact of $3.1b and 24,000 FTE job years (rounded).

It is therefore considered that the benefits of Sunfield are in line with the original application and those outlined within section 4.1 of this report, and that these benefits would be regionally significant.

[9] Auckland Council's Economic Review (Annexure 2) – Paragraph 13 onwards.

5 AREAS OF CONTENTION

5.1 Introduction

Following a review of the comments received from invited parties under section 53, the below areas are considered to be in contention with regard to potential adverse effects:

a) Stormwater and Flooding
b) Water Supply
c) Wastewater
d) Transportation
e) Ecology
f) Productive Soils
g) Urban Form / Character
h) Parks and Reserves
i) Groundwater
j) Provision of Mill Road – Stage 2
k) Infrastructure Provision and Servicing
l) Noise Effects (Ardmore Airport)
m) Safety (Ardmore Airport)

An assessment of the effects was provided under section 7 (pages 97 to 216) of the original application, with this still being relevant and applicable. The following information is provided based on themes from the written comments received under section 53 and focusses on differences of opinion and/or points of clarification.

Commentary on each effect and potential adverse impact is provided, along with a section 85(3) assessment factoring in the proposed conditions being offered by the applicant, and the benefits assessment undertaken in Section 4 above (if required).

Following a review of the comments from invited parties, an updated set of proposed conditions are attached as **Attachment B**, with further detail as to the pertinent conditions outlined below.

5.2 Stormwater and Flooding

5.2.1 Commentary

Feedback has been provided by Auckland Council (Healthy Waters) regarding stormwater and flooding, which have been grouped into the below themes. A subsequent response report has been prepared by Maven regarding stormwater and flooding within **Attachment N** which responds to these queries in full, with the below providing a summary. An updated Stormwater Modelling Report has been prepared by Maven and is contained within **Attachment O**. The stormwater model has been peer reviewed by CKL, which outlines that the modelling work undertaken is appropriate (**Attachment P**).

5.2.1.1 Design of Stormwater Attenuation Basins

Auckland Council raise concerns with the design of the four stormwater basins, primarily relating to:

- the location below the groundwater table, with flat bases and no internal gradients, benches, or low-flow channels;
- the lack of redundancy; and
- the feasibility of accommodating these basins within the allocated space

The Maven response report outlines the rationale and mitigation strategies embedded into the design of the four stormwater basins which addresses the concerns raised above. The Maven addendum report concludes in regard to these basins that:

'The current basin design reflects a deliberate and technically justified approach to flood attenuation. While terracing and low flow channels offer additional benefits, they are not essential for the basin to be functional, resilient, and maintainable. The design incorporates alternative measures to address erosion, sedimentation, waterlogging, amenity, and long-term operability, and remains open to refinement where beneficial.'[10]

5.2.1.2 Flooding of Airfield Road and Hamlin Road

Auckland Council raise concerns that the reliance of an informal network of drains result in flooding across Airfield Road and Hamlin Road, with these roads having an increase in vehicle movements as a result of the Sunfield development proposal.

[10] Stormwater and Flooding Response Report – Maven – Attachment N – Page 5

The Maven response report has addressed this issue[11] and states:

- Hamlin Road has been strategically realigned and upgraded to form part of the stormwater catchment boundary, functioning as the high point separating the two main catchments. Hamlin Road itself will be elevated above flood levels to ensure it remains operational during storm events.

- Airfield Road is located outside the development site, and flooding conditions in this catchment will not be exacerbated or worsen, with flooding on Airfield Road being alleviated for the 2-year ARI event.

- Currently, a single 1200mm culvert located beneath 269 Airfield Road provides formal stormwater conveyance. To address the 2-year flooding event on Airfield Road, the applicant is proposing a series of 300mm stormwater pipes beneath the road, replicating the current extent of surface flooding, and improving conveyance whilst maintaining existing flow patterns and minimising downstream hydraulic impacts.

- Managing the 10-year flooding event on Airfield Road would require a more substantial upgrade, however this would result in increased flood rates and depths on downstream properties, which would require a formal downstream stormwater connection. The applicant is willing to contribute to resolving this matter, however, this cannot be achieved without agreement from Healthy Waters, hence the current proposal to not worsen the existing flooding conditions.

5.2.1.3 Impact on McLennan Dam (including use as tertiary treatment device)

Auckland Council consider that the proposed diversion of a 54.9 ha catchment into the existing McLennan Dam has not been evaluated, and this dam provides mitigation of flood hazards and water quality treatment for the existing catchment.

The Maven addendum report addresses the impacts on the McLennan Dam from a flood protection, water quality, and structural integrity perspective[12], and in summary states the below.

[11] Stormwater and Flooding Response Report – Maven – Attachment N – Page 5
[12] Stormwater and Flooding Response Report – Maven – Attachment N – Page 7

Flood Protection

- Proposed Stormwater Pond 4 has been specifically engineered to attenuate flows from the additional 54.9ha catchment prior to discharging to the Awakeri Wetlands, and in turn McLennan Dam. Stormwater will be released at a controlled rate ensuring that peak flows entering the downstream system do not increase.

- Modelling has been undertaken to assess the impacts, with post-development modelling indicating a reduction in peak flow of 10%, outlining the effectiveness of the Stormwater Pond 4 mitigation measures.

Water Quality

- It is proposed to provide GD01-compliant water quality treatment for Stormwater Pond 4, and the additional 54.9 ha catchment, meaning the McLennan Upper Wetland is not required to treat the water.

- The flow rate of pollutant-bearing water will remain unchanged, so the total mass of contaminants entering the wetland will not increase.

- The additional upstream clean water will result in greater dilution and lower pollutant concentrations.

- There will be a stable hydraulic retention time within the wetland as the peak flow rate into the wetland will decrease, meaning treatment processes will not be impacted.

- Maven summarise by stating:

  'The proposed arrangement ensures that the McLennan Upper Wetland continues to operate within its design parameters, treating the same pollutant load while benefiting from improved dilution and retention conditions. The delayed release from Pond 4 further supports this outcome by reducing the likelihood of hydraulic stress on the wetland system.'[13]

[13] Stormwater and Flooding Response Report – Maven – Attachment N – Page 9

Structural Integrity

- Based on the peak flow rate into the dam decreasing, resulting in a lower maximum flood level, the structural integrity of the dam is not expected to be affected.

- The duration of elevated water levels above the spillway crest is anticipated to increase from 1 hour 10 minutes to 1 hour 15 minutes during the 100-year storm event. This additional 5 minutes is not expected to compromise the structural integrity of the dam.

5.2.1.4 Overland Flow Paths

Auckland Council have raised concerns with the lack of consideration of local overland flow paths. This in turn has been addressed within the Maven addendum report, which states:

'Local overland flow paths have been considered in the modelling and layout of the site. The stormwater modelling provided in the application is based on finished ground levels that closely reflect the final design and has been developed with sufficient detail to demonstrate that the proposed stormwater management approach is both feasible and compliant with flood risk requirements.

The design ensures that surface water is directed away from critical infrastructure, habitable activities and neighbouring properties, with overland flow paths integrated into the road corridor (primarily the road carriageway) and reserve layouts to safely convey excess runoff during extreme events.'[14]

The application modelling provides a strategic understanding of flood risk and a detailed assessment of localised overland flow paths and lot-specific flood risk assessments will be undertaken at the detailed design stage (see section 5.2.2 below regarding proposed conditions in this regard – conditions 177 and 178).

5.2.1.5 Vesting of Stormwater Channels

Auckland Council have raised concerns with the extent of the land to vest containing the stormwater channels and whether this will deliver additional public benefit that cannot otherwise be achieved through private ownership and maintenance. Effectively, Auckland Council question the extent of land to be vested to ensure that the areas to be vested are functionally necessary and represent an efficient use of public land ownership.

[14] Stormwater and Flooding Response Report – Maven – Attachment N – Page 10

Maven have considered this within the addendum report[15], and to summarise state:

- Vesting to Auckland Council will provide long-term certainty around access, maintenance and operational responsibility, which supports integrated stormwater catchment management for strategic stormwater infrastructure.

- The channels are part of a primary stormwater network and public ownership will allow for these assets to be maintained and upgraded in response to future catchment changes or network demands.

- Public ownership reduces the risk of fragmented responsibilities and ensures appropriate access for inspection and emergency response.

- The channels provide public benefit beyond the conveyance of stormwater through visual amenity, passive recreation and ecological connectivity that may not be realised under private ownership. This has occurred for Awakeri Wetlands Stage 1 to the west of Sunfield, and based on the environment surrounding the conveyance channel, this has had positive effects.

5.2.1.6 High Contaminant Generating Car-Parks

The proposal involves high contaminant generating car-parks which are exposed to rainfall and designed for more than 30 vehicles. There are three car-parks within Sunfield which are greater than 5,000m^2, which have a collective area of 21,000m^2. These include the main car-park in the proposed Town Centre (**Figure 10**), the Healthcare facility car-park adjoining the Town Centre (**Figure 11**), and the car-park within Local Hub D in the north-west portion of Sunfield (**Figure 12**).

[15] Stormwater and Flooding Response Report – Maven – Attachment N – Page 24

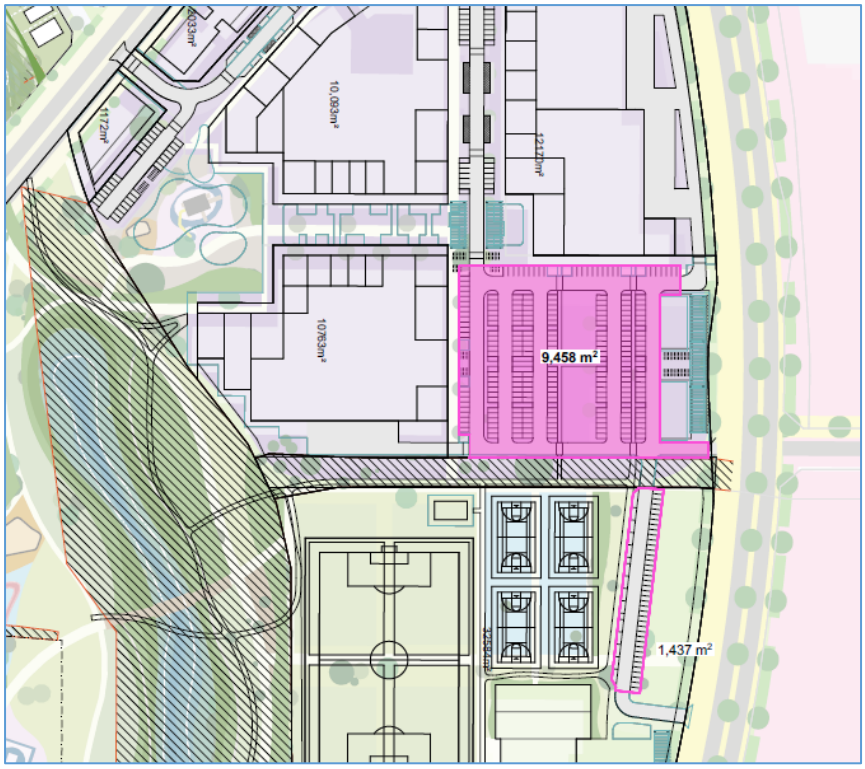

Figure 10: Town Centre Car-Park *(Source: Studio Pacific Architecture)*

Figure 11: Healthcare Facility Car-Park *(Source: Studio Pacific Architecture)*

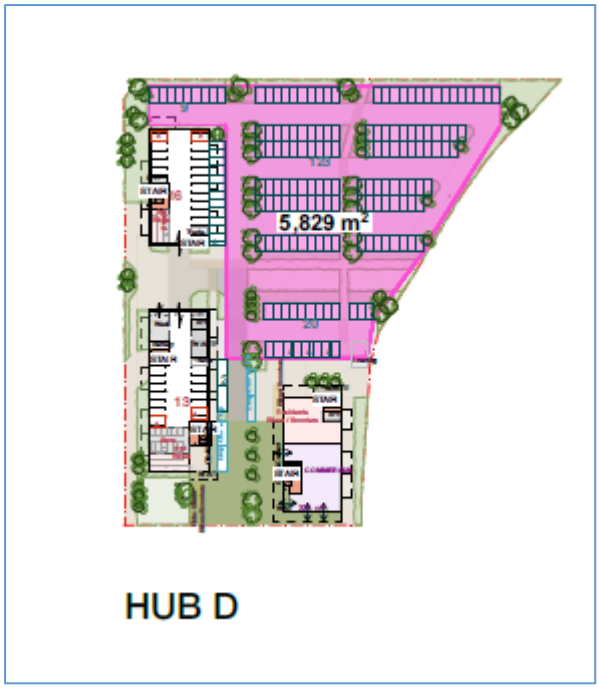

Figure 12: Local Hub D Car-Park *(Source: Studio Pacific Architecture)*

The proposed roads within Sunfield will not carry more than 5,000 vehicles per day (approximately 3,000 are anticipated), meaning they are not classified as high use roads.

As a non-complying activity overall, the effects associated with stormwater run-off, including stormwater quality, have been addressed in the technical reports accompanying the original application which has considered the overall development proposal.

Likewise, the objectives and policies of the AUP Chapter E9 High Contaminant Generating Car-Parks and High Use Roads revert to Chapters E1 Water quality and integrated management and E2 Water quantity, allocation and use. These have been assessed within the Planning Report at section 9.4 (pages 270 to 275), recognising the consideration of the overall development proposal.

Water quality has been addressed in the original application, as well as additional commentary being provided within the Stormwater and Flooding Response Report (**Attachment N**)[16], which outlines the stormwater quality toolbox, with the wetlands serving this purpose as a catchment wide stormwater management device.

[16] Stormwater and Flooding Response Report – Maven – Attachment N – Page 40

5.2.1.7 Erosion of Stormwater Channel

Previous queries have been raised regarding the associated erosion risk in the proposed stormwater channel. An Erosion Risk Assessment has been undertaken by CKL and is contained within **Attachment Q**. In summary the report outlines that the natural subgrade of the channel would be subject to moderate erosion risk under post development conditions with climate change allowances. The report outlines a number of possible measures that can be used to mitigate these effects, and notes:

'Further refinement of the assessment during detailed design, supported by site-specific soil investigations and hydraulic modelling, is recommended to confirm the need and extent of such measures.'[17]

This detailed design will occur at the Engineering Plan Approval stage and is anticipated in the proposed conditions.

5.2.2 Proposed Conditions

Conditions have been proposed to mitigate and manage stormwater and flooding effects, which include the following key conditions, noting updates to these conditions have occurred following feedback from Auckland Council:

- Condition 27 - The requirement of a stormwater management plan to be submitted and certified prior to earthworks commencing. Whilst not relying on Council's Regionwide Network Discharge Consent, given the size of the catchments it is considered that the objectives of this consent provide an appropriate benchmark. This includes the requirement of a consent notice (condition 195) under the subdivision consent to ensure on-going compliance.

- Conditions 120 and 175 – Staging conditions to ensure that the stormwater infrastructure is implemented and integrated with land-use development to appropriately mitigate adverse effects.

- Conditions 160, 181, 182, 187 to 190, and 206 – The vesting, landscaping and maintenance of reserves, including those for drainage purposes.

[17] Erosion Risk Assessment – CKL – Attachment Q – Page 5

- Conditions 161, 161A, 162, and 170 to 172 – Ensuring the detailed design of stormwater assets are appropriately considered at the Engineering Plan Approval Stage, including on-going operational and maintenance requirements.

- Conditions 177 and 178 – The requirement to submit a flood report when applying for a 224(c) certificate which identifies flood levels and overland flow paths within the roads and reserves. This is accompanied by a requirement that any future buildings within the development which are subject to 1% AEP flooding must follow the Stormwater Code of Practice and that no structures or obstructions are erected in an overland flow path.

5.2.3 Section 85(3) Assessment

There are potential adverse effects arising from stormwater and flooding on the proposed development. However, in recognition of the proposed stormwater management solutions including the stormwater channels and basins outlined within the original application and within the additional information provided as part of the s55 response documentation, including proposed conditions, it is considered that these effects can be appropriately mitigated. The proposed stormwater solutions are considered to appropriately manage environmental risk and the risk to property and human safety. Accordingly, this is not deemed to be an adverse impact in the context of the FTAA.

5.3 Water Supply

5.3.1 Commentary

Comments have been provided from Watercare regarding water supply, which have been grouped into the below themes. A subsequent response report has been prepared by Maven regarding water supply within **Attachment R**, which contains more detailed analysis.

5.3.1.1 Water Supply Bulk Infrastructure Sequencing

Watercare have outlined that the servicing of the Sunfield development should be line with the FDS (Future Development Strategy), with the FUZ portion of the site not programmed for development until 2050+, and the remaining MRZ portion of the site not being anticipated for development.

As outlined within the original application, the deferral of this area being acceptable for urban growth as part of the FDS is largely a financially driven decision, not a planning one, with this greenfield area being a

logical location for urban growth, which is even more compelling given the alignment of the proposed MR2 corridor.

Watercare are of the opinion that development of FUZ areas ahead of the completion of bulk infrastructure required to support growth in those areas exacerbates infrastructure capacity issues in the existing live zoned areas, resulting in serviceability impacts (e.g. levels of water pressure below adequate levels of service for key purposes such as firefighting).

Contrary to this view, it is noted that the proposed Sunfield development is a listed project under the FTAA and a committed proposal, with the land-use activities and in turn demand for water supply being known and anticipated. Whilst live zoned land enables development, it doesn't constitute known or committed development. Many lived zoned sites will remain undeveloped for a long period of time.

The Sunfield development is also projected to be implemented over a 15-year period, with 23 stages. The scale of the proposed development therefore enables and allows for adaptive planning, with Watercare confirming that significant capacity is currently available for 57ha of land (FUZ land). Notwithstanding that Watercare have not undertaken further capacity assessments for the MRZ land, the timeframe for the construction of the whole development will allow for the water supply provision to be planned and implemented, recognising the existing capacity within the Waikato-1 Watermain and Hunua Watermains, which can be used as part of a staged rollout prior to the commissioning of the Waikato-2 Watermain.

5.3.1.2 Infrastructure Funding

Watercare outline that the cost of the infrastructure would need to be borne by the Applicant and subject to an Infrastructure Funding Agreement.

As outlined under section 5.12.1 of this report, it is confirmed that the applicant would be willing to enter into an Infrastructure Funding Agreement (IFA) with Council and other infrastructure providers, subject to appropriate offsets for Development Contributions.

5.3.1.3 Water Supply Capacity

Watercare have confirmed that there is capacity within the bulk water supply network to supply the 57ha of land (FUZ land), however, Watercare have not undertaken an analysis of whether there is capacity for the

MRZ land. This lack of analysis is a little difficult to understand, given the subject Fast-track application is a listed project under the FTAA and a legal and valid way to consent a development proposal.

Watercare, in their written comments, have outlined that both the Airfield Road Bulk Supply Point (**BSP**) and Porchester Road BSP are at full capacity and cannot accommodate new connections. Maven, on behalf of the applicant, have been discussing the BSP capacity considerations with Watercare and note that confirmation has been provided that a like-for-like upgrade of the Airfield Road BSP is to proceed. Maven therefore consider that this would enable enough capacity for the Sunfield development, advising:

'The BSP located outside 394 Airfield Road currently services a 230mm water main. Maven is of the opinion that this BSP can be upgraded to a 450mm main from the Takanini No. 2 transmission main, which would provide enough capacity to service the full Sunfield development. Preliminary hydraulic analysis indicates that such an upgrade could yield approximately a 484% increase in flow capacity, assuming pressurised flow conditions and consistent pipe material. This estimate is based on the Hazen-Williams equation and reflects the influence of pipe diameter on flow performance. It is noted that WSL's design pressure range for transmission water mains is typically between 250 kPa and 1600 kPa, which supports a wide range of operational scenarios. This pressure range has been used to inform the above capacity estimate.'[18]

5.3.1.4 Access to Water Supply

Watercare outline that the primary water supply challenge is accessing the transmission capacity and that the construction of a new BSP to access the bulk water supply available from the Waikato-1 Watermain is restricted due to the shutdown limitations for this watermain. The next scheduled shutdown will occur in late 2025 at Quarry Road. Following this, Watercare outline that they will not allow any further non-essential shutdowns of the Waikato-1 Watermain until the Waikato-2 Watermain is operational (approximately 2034).

It is considered that there are a number of workable options available for further investigation in order to access the water supply, which have been discussed with Watercare and include:

- Utilising a new BSP in the Takanini area, which the applicant understands is planned for the Waikato-1 Watermain in the near future. This could be connected in an advanced timeframe.

[18] Water Supply and Wastewater Response Report – Maven – Attachment R – Page 5

- A new BSP on one of the transmission lines located on Burnside Road, which include the Hunua-1, Hunua-2 and Hunua-3 Watermains. The applicant understands that these watermains do not carry the same operational constraints as the Waikato-1 Watermain.

The applicant is willing to discuss these options further with Watercare.

5.3.2 Proposed Conditions

A number of conditions are proposed which state what infrastructure is to be provided and when. The staging conditions (120 and 175) outline what water supply infrastructure must be constructed and operational prior to any building within that respective stage being occupied. These conditions will therefore manage the timing (and in turn funding) of the associated infrastructure required to implement the Sunfield development.

Conditions 162, 168, 169 and 205 also state that the reticulated water network connections must be provided to the required standard in order to obtain the respective 224(c) certificate (and in turn title). This will ensure that each lot, and subsequent purchaser, has an appropriate water connection. Condition 117 also states that the required water supply pipes and ancillary equipment are provided to buildings prior to the occupation of the respective building.

5.3.3 Section 85(3) Assessment

Given that the known and agreed capacity for 57ha of development is available, the extended staging period for a known and committed development (15 years), and that viable options are available to access the available bulk water supply, it is considered that there are no adverse effects. This is in a context where infrastructure capacity is required to service the development, otherwise the proposed development will not succeed. In simple terms, people will not purchase a house if there is no infrastructure. The provision of infrastructure itself, therefore, does not constitute an adverse effect, noting conditions are proposed requiring water network connections to be in place at the appropriate stage, and prior to 224(c) (a title) and buildings being occupied. Water supply matters, in turn, are therefore not considered to be an adverse impact.

5.4 Wastewater

5.4.1 Commentary

Feedback has been provided from Watercare regarding wastewater infrastructure, which has been grouped into the below themes. A subsequent response report has been prepared by Maven regarding wastewater which is contained within **Attachment R**, and contains more detailed analysis.

5.4.1.1 Wastewater Bulk Infrastructure Sequencing and Funding

As with water supply, Watercare have the same concerns with wastewater and the roll out of bulk infrastructure and funding. These issues are comparable to the water supply network, so to summarise:

- The timing in the FDS is largely a financially driven decision, not a planning one.
- The applicant is willing to fund the required infrastructure to service Sunfield, and enter into an Infrastructure Funding Agreement (IFA) with Council and other infrastructure providers, subject to appropriate offsets for Development Contributions.
- Sunfield is a listed project under the FTAA and a known and committed development, with the wastewater demand largely being understood, with many lived zoned sites remaining undeveloped and not requiring additional capacity.
- Veolia have confirmed that the transmission network has sufficient capacity to accommodate the FUZ land (1,550 residential dwellings). The scale and timing of the proposed development enables and allows for adaptive planning and staging, noting this catchment is not identified within Watercare's wastewater constraint areas.

5.4.1.2 Wastewater Capacity and Upgrades

Watercare have outlined that the proposal would require an extension of the Takanini branch sewer, which would include upgrades to the existing sewer line and also upgrades to the Southern Interceptor, and that these upgrades are not planned or funded.

Maven have undertaken a hydraulic capacity assessment of the Takanini Branch Sewer based on a Low Pressure Sewer (**LPS**) configuration and state:

'A hydraulic capacity assessment has been undertaken by Maven for the Takanini Branch Sewer, based on projected flows from the proposed Sunfield development under a LPS configuration. The analysis confirms that the existing Takanini Branch Sewer has sufficient residual capacity to accommodate LPS flows from the Sunfield development without requiring upgrades to the branch sewer.'[19]

5.4.1.3 Proposed Low-Pressure Sewer

Watercare deem the use of an LPS to be unacceptable due to system risk under power failure, and that it is unlikely to sufficiently reduce flow from the site to negate the need for upgrading the downstream system.

The Maven Wastewater Response Memo provides an assessment of why LPS systems are considered appropriate for the Sunfield development and summarises:

'In conclusion, the Applicant maintains that:

- *the proposed LPS system is consistent with national guidelines and proven practice and has been approved and vested by WSL throughout Auckland.*
- *the scale of the system is supported by precedent both locally and internationally.*
- *risks identified by WSL can be effectively mitigated through design and operational controls.*
- *ownership and management by WSL ensure alignment with their service standards (as has been proven through the vesting and operation of similar LPS systems throughout Auckland of a similar scale).*
- *the system provides a viable solution to enable development now, while network upgrades are planned and delivered.'*[20]

5.4.1.4 Wastewater Treatment Capacity

Watercare have stated that the Mangere Wastewater Treatment Plant (WWTP) is constrained by the existing resource consent, which includes an average daily flow limit condition. This consent expires in 2032 and a new discharge consent will be required, with Watercare outlining that no upgrades, outside those planned for treating flows from the Central Interceptor, are anticipated between now and the end of the existing consent. A new discharge consent will determine future scale and timing of wastewater upgrades.

[19] Water Supply and Wastewater Response Report – Maven – Attachment R – Page 7
[20] Water Supply and Wastewater Response Report – Maven – Attachment R – Page 9

Whilst no detail has been provided as to the current average daily flow rate, it is presumed that this is close to the requirement stipulated in the condition, hence the Watercare feedback.

Maven have noted that the catchment is not currently identified within Watercare's wastewater constraint areas, and that Watercare have the potential to regulate flows between the Mangere WWTP and Rosedale WWTP by way of the Northern Interceptor, which has been commissioned and will be put into use in 2026.

5.4.2 Proposed Conditions

The staging conditions (120 and 175) outline what wastewater infrastructure must be constructed and operational prior to any building within that respective stage being occupied. These conditions will therefore manage the timing (and in turn funding) of the associated infrastructure required to implement the Sunfield development.

Conditions 162, 167 and 205 also state that the reticulated wastewater network connections must be provided in order to obtain the respective 224(c) certificate (and in turn title). This will ensure that each lot, and subsequent purchaser, has an appropriate wastewater connection. Condition 117 also states that the required wastewater pipes and ancillary equipment are provided to buildings prior to the occupation of the respective building.

5.4.3 Section 85(3) Assessment

It is therefore considered that there is available capacity for wastewater servicing based on the residual capacity in the existing network, implementing an LPS-Hybrid system, a staged roll-out over 15 years with this being a known and anticipated development, and the provision of on-site storage and public pump stations. Therefore, as with water supply matters, there are considered to be no adverse effects associated with wastewater infrastructure as a lack of capacity does not constitute an adverse effect, noting conditions are proposed requiring wastewater network connections to be in place at the appropriate stage, and prior to 224(c) (a title) and buildings being occupied. Wastewater matters, in turn, are therefore not considered to be an 'adverse impact'.

5.5 Transportation

5.5.1 Commentary

Feedback has been provided by Auckland Transport, Auckland Council and NZTA regarding transportation matters, which has been grouped into the below themes. Subsequent addendum reports have been prepared by Commute regarding transportation which respond directly to the feedback received and provide an assessment of the traffic modelling completed by NZTA for the various scenarios involving the Sunfield development and the MR2 proposal. These are contained within **Attachment H**, and provide a detailed analysis, with the below providing a summary.

5.5.1.1 Impact of MR2

Prior to, and following feedback being received, the applicant has been engaging with NZTA regarding the integration of MR2 and Sunfield. The change in effects between the original proposal and the amended proposal have been outlined in section 3.3.6 of this report, where it is concluded that the reduction in land to be developed within the Employment Precinct would result in 69-95 less vehicle movements in the peak hour.

5.5.1.2 Trip Generation Rate and Infrastructure Upgrades

Auckland Transport and Auckland Council have raised concerns with the underlying assumptions of the trip generation rates, and in turn the suitability of the proposed transportation infrastructure upgrades including intersections and active modes.

In regard to trip generation, Auckland Transport and Auckland Council state that trip rates are likely to be higher than the 1,100 vehicles per hour (**vph**) as estimated within the original application and the integrated transportation assessment prepared by Commute.

NZTA has prepared further extensive traffic modelling relating to MR2 with and without the proposed Sunfield development. The modelling has been undertaken by the Auckland Forecasting Centre (**AFC**) and builds on initial modelling of the Sunfield development undertaken by Beca Consultants for Auckland Transport. The modelling includes scenarios with and without the Sunfield development and with and without MR2.

Another key assumption of this modelling relates to the trip generation, with a figure of 3,000vph being the basis for the modelling (based on Auckland Transport and Beca Consultants assumption). This trip generation figure is significantly higher than that which was assumed in the ITA within the original application at 1,100vph.

The modelling finds that the development of Sunfield, with the intersection upgrades proposed in the original ITA and the changes resulting from the construction of MR2, generally results in an acceptable level of performance in the surrounding local area in 2041. Some additional intersections were identified in the wider network that will be approaching capacity based on the higher traffic generation assumed by AFC (being 3,000vph vs 1,100vph). Based on these findings, the applicant proposes an additional condition (as outlined below) that monitoring should occur relating to the trip generation of the development with a further Integrated Transport Assessment required to determine if the wider intersections identified in the modelling memorandum require additional mitigation and / or if any additional measures are required to reduce trip generation within Sunfield. The modelling results are contained within the memorandum prepared by Commute in Attachment H.

In regard to active mode upgrades Auckland Transport and Auckland Council consider that additional active mode upgrades external to Sunfield should be provided by the applicant. This includes walking and cycling facilities on Airfield Road, Mill Road, Cosgrave Road, and Old Wairoa Road.

The Transportation Response Report acknowledges that aspects of these upgrades should be undertaken, and states:

'The applicant agrees with the proposed upgrades detailed above, with the exception being the shared path on Airfield Road. This comment is made on the basis that:

- *it would be better for mode share to be concentrated within the Sunfield development especially around the residential neighbourhoods so that it can link to the proposed cycle/Active Mode network which is outlined in the plan which accompanies this response.*
- *as per the Notice of Requirement lodged by NZTA for Mill Road stage 2, Mill Road will connect to Airfield Road via a roundabout.*

It is considered that these issues are best managed / addressed in detail by way of meetings between the applicant and AT / Council engineers. In this regard an initial meeting will occur on 13th October with anticipation of further meetings / workshops. The applicant is open to discussing the extent of active mode provisioning in support of the Sunfield development.'[21]

[21] Transportation Response Report – Commute – Attachment H – Section 5.7.10 – Page 34

It is therefore anticipated that the proposed conditions will be updated in due course to reflect these on-going discussions.

5.5.1.3 Privately Funded Public Transport Service

Auckland Council and Auckland Transport have raised concerns with the operation of a privately funded public transport service and the expertise required to maintain such a service.

Information on this matter was provided within the Minute 3 response[22], which outlined that the applicant will establish and fund an operating company to purchase, operate and maintain a fleet of Sunbuses as required to cater for demand at Sunfield.

The proposed automated bus fleet is to be provided by Ohmio Automation Limited and has NZTA level 4 approval and can be licensed to operate on New Zealand roads which allows for connection of the service outside of the Sunfield development.

Further, conditions (114 and 120) outlined below in section 5.5.2 will ensure the on-going effective operation of the service.

5.5.1.4 Capacity of Takanini and Papakura Rail Stations

Auckland Council and Auckland Transport have concerns that limited investigation into the capacity of the Takanini and Papakura rail stations to accommodate additional bus services has occurred. The applicant is willing to have on-going consultation with AT regarding this matter as required, noting condition 114 has been amended in this regard.

5.5.1.5 Demand on Existing Public Transport Service

Auckland Council and Auckland Transport have raised concerns regarding the ability of the existing public transport service to cater for the demand of the initial stages of the proposal. As outlined under the Minute 3 response[23], the first stages of development are intended to be in the southern portion of Sunfield which is within walking distance of Bus Route 372.

[22] Minute 3 Response Table dated 17th July 2025 – Item 2.4.4
[23] Minute 3 Response Table dated 17th July 2025 – Item 2.4.2

5.5.1.6 Detailed Engineering Design

Following feedback from Auckland Council and Auckland Transport, further detailed design of the neighbourhoods within the Neighbourhood Plans has been provided (**Attachment C5**), which has considered vehicle manoeuvring in more detail. The Transportation Response Report states:

'As noted above, the applicant has now developed a detailed design for each of the Sunfield neighbourhoods (to a level suitable for Engineering Approval) which demonstrates the functional testing of each neighbourhood, specifically the vehicle tracking compliance for:

- *8m long fire truck.*
- *10.3m public rubbish truck vs 6.3m van (in lanes / roads served by public collection).*
- *8m long rubbish truck vs car on lanes with private collection.*

As specified within the draft conditions, the applicant will provide further vehicle tracking curves for each stage as required to comply with the Engineering Approval requirements.'[24]

5.5.1.7 Sunfield Loop Road

Auckland Council and Auckland Transport have raised concerns with the possible 'gap' within the Sunfield Loop Road, and that this would effect active modes and public transport. As outlined under the Minute 3 response[25], the Engineering Drawings have shown there will be the ability for turnaround areas at the terminus of any roads where the loop road cannot be connected.

5.5.1.8 Parking Effects

Auckland Council, Auckland Transport and other invited parties have raised concerns with uncontrolled parking and effects on the road network, and spill over parking into adjacent neighbourhoods.

The transportation feedback response report as **Attachment H** addresses this matter further, and summarises:

a) The National Policy Statement for Urban Development no longer requires on-site parking to be provided (except accessible parking).

[24] Transportation Response Report – Commute – Attachment H – Section 3.3.1 – Page 11
[25] Minute 3 Response Table dated 17th July 2025 – Item 2.6.1

b) Future residents will be very aware of the limited parking and 'car-less' nature of the development.

c) The design measures proposed for Sunfield are illustrated within the updated Neighbourhood Plans contained within **Attachment C5**, with a more detail plan provided for Neighbourhood 11, noting:

- Alternative modes, including walking, cycling and public transport are provided for, which provide access to the Town Centre Precinct, Employment Precinct and nearby Takanini and Papakura Town Centres.
- Pavement surfaces will be designed to avoid facilitating car-parking spaces.
- Road markings and signage will be implemented in areas of no parking.
- Fully developed berm areas to ensure vehicles don't park in these areas.
- Loading and unloading spaces within the laneways.
- Access provision for emergency vehicles.
- The over-arching resident's society will have the power to enforce parking restrictions.

5.5.1.9 Travel Demand Management Plan (TDMP)

Auckland Transport recommend that a wider TDMP be provided for all precincts, rather than just the Employment Precinct. It is considered that the associated condition (130) incorporates businesses within the Town Centre Precinct, however, the other precincts (predominantly the Residential) have not been incorporated into the proposed condition, as this is considered challenging to administer and implement due to the scale and the number of property owners.

5.5.1.10 Construction Traffic

Auckland Council and Auckland Transport have raised concerns with the lack of assessment of construction traffic effects, particularly impacts on pavement conditions. These have been addressed within the Minute 3 response[26], noting that draft management plans have been provided with the substantive application which will be updated through the proposed conditions (20 and 21), which requires temporary protection measures to be installed to minimise damage to public roads and footpaths (condition 21j).

[26] Minute 3 Response Table dated 17th July 2025 – Item 2.9.1 to 2.9.3

5.5.1.11 Emergency Services and Loading

Auckland Council has raised concerns with how emergency services, moving trucks, and other service vehicles will access dwellings, noting the distance between the service hubs and some dwellings. As outlined under section 5.5.1.8 of this report, updated Neighbourhood Plans are provided which illustrate the loading and unloading areas and access for emergency vehicles within the laneways.

5.5.2 Proposed Conditions

A number of conditions have been proposed to manage and mitigate potential transportation effects, which include:

a) Condition 20 and 21 and the requirement of a Construction Traffic Management Plan, which builds on the submitted management plans, to ensure construction traffic and heavy vehicle movements are appropriate managed.

b) Conditions 110 to 113B regarding car-parking requirements, including electric vehicle charging stations and accessible parking spaces, which has been added following feedback from Auckland Council and Auckland Transport.

c) Condition 114 and the operational requirements of the Sunbus public transport system being provided for certification prior to implementation. Following feedback from Auckland Transport, this condition has been amended to ensure the 'trip plan' factors in Takanini and Papakura rail stations.

d) The staging conditions (120, 122, 123, 175, and 176) have been updated, particularly conditions 123 and 176 regarding transportation upgrades. These proposed conditions have been amended to ensure the agreed transportation infrastructure gets constructed at the appropriate time, with triggers being amended to reflect impacts from the wider Sunfield proposal, as opposed to particular stages which could occur in a non-sequential order.

e) A new condition (123A) which states that after approximately one third of residential dwellings within Sunfield being occupied, monitoring should occur relating to the trip generation of the development with a further Integrated Transport Assessment being required to determine if the

wider intersections identified in the modelling memo require additional mitigation and / or if any additional measures are required to reduce trip generation within Sunfield.

f) A range of conditions to ensure that the internal roading, intersections, accessways, footpaths and cycleways are appropriately designed and constructed, including conditions regarding Engineering Plan Approvals being in place prior to s224(c) certification.

g) Condition 130 regard a Travel Demand Management Plan, which has been amended to incorporate businesses in the Town Centre Precinct.

5.5.3 Section 85(3) Assessment

Therefore, based on the original application and additional information from Commute, and reflecting on the proposed conditions put forward with the application, particularly the staging and monitoring conditions, it is considered that the adverse transportation effects are acceptable. The proposal provides for a range of transportation modes, with the surrounding transportation network being able to accommodate the proposed Sunfield development, following the required infrastructure upgrades. This is therefore not deemed to be an adverse impact in the context of the FTAA provisions.

5.6 Ecology

5.6.1 Commentary

Feedback from Auckland Council has been provided on both freshwater and terrestrial ecological matters, with freshwater impacts being raised as the most pertinent. Auckland Council are of the view that there are information gaps relating to the amount of stream diversion, and in turn a net loss in stream length and ecological values may occur.

A subsequent addendum report from Bioresearches is provided within **Attachment I**. This report provides more detail as to the adverse effects on freshwater ecology and addresses the s53 feedback, and is summarised below:

- Four permanent watercourses traverse the site, totalling 2.56km, with 4.6km of artificial farm drains and one natural wetland. The proposal includes the diversion of 2,220m of modified permanent stream to a new alignment, with the final diverted stream length comprising 4,447m of linear stream bed incorporating an additional 2,227m of stream extent.

The Biosearches report concludes with regard to streamworks:

*'The permanent modification of the stream through diversion, without mitigation, is considered to be of **High** magnitude due to the permanent modification of in-stream habitats. Accounting for positive stream design and the stream restoration activities, the stream diversion following mitigation measures in regards to both stream extent and stream value is considered to be of **Low** magnitude, resulting in an overall **Low** level of effect.'*[27]

- In addition to the enhancements of stream systems within the site, 3,520m of stormwater conveyance channel is proposed to be constructed throughout the site which have connectivity to the enhanced streams and provide an increase in available aquatic habitat within the site.

- Sunfield will be constructed in stages, as will the required streamworks, therefore disturbance will be isolated over time to minimise the degree of sedimentation, with the construction methodologies managing any potential adverse effects.

- Council have queried the proposed stream enhancements and that these are addressing other effects and are not consistent with the principle of additionality, with respective statutory references being provided. These references relate to off-setting, and not mitigation, as per the effects management hierarchy. The Bioresearches report provides an assessment of the effects hierarchy, which outlines the mitigation measures proposed, and that no offsetting is considered necessary as ecological effects can be appropriately mitigated.

- Earthworks within 10m of the natural inland wetland constitutes 443m^2 or 0.3% of the contributing catchment, with shallow cuts (less than 1m), meaning the hydrological inputs should not be significantly altered.

- The length of the proposed culverts (808m) will be mitigated by the large increase in stream length during the diversion process.

The effects on ecology are therefore appropriately considered as outlined within the original application, and can be appropriately managed and mitigated.

[27] Ecological Assessment Report – Bioresearches – Attachment I – Page 4

5.6.2 Proposed Conditions

Following feedback from Auckland Council, the conditions relating to ecological matters have been reviewed.

- Condition 90 and 92 have been updated to reflect Auckland Council standardised conditions for the requirement of a Lizard Management Plan and Native Fish Capture and Relocation Plan.

- Condition 91 and the requirement of an Environmental Management Plan has been removed, as it is recognised that this may cause confusion with other management plans and is effectively a double-up of other conditions. However, following further review from the applicant and as detailed within the addendum report from Bioresearches, an additional condition (95F) has been proposed regarding vegetation removal in order to mitigate the potential effect on nesting native birds.

- Condition 93-95 have been retained for the requirement of a Stream Riparian Planting Plan, although these have been refined in recognition that no off-setting is proposed. It is considered that an appropriate level of information is provided within this application regarding the loss of vegetation and habitats and subsequent enhancement actions, and that a subsequent condition (95) will ensure that these occur within set parameters. Condition 31 also requires detailed landscape design drawings to be provided prior to the commencement of the associated works.

- Following feedback from Auckland Council, additional conditions regarding the implementation of a Native Fish Capture and Relocation Plan and a Fish Salvage Report have been incorporated into the proposed conditions (92A and 92B).

- Following feedback from Te Akitai Waiohua and Auckland Council, additional conditions (95B-95E) have been put forward regarding instream structures and fish passage.

5.6.3 Section 85(3) Assessment

Therefore, based on the original application and additional information from Bioresearches, and reflecting on the proposed conditions put forward with the application, it is considered that there are minimal adverse effects associated with ecology.

5.7 Productive Soils

5.7.1 Commentary

Auckland Council have raised concerns regarding the loss of productive soils and the displacement of existing rural activities[28]. In response to this feedback, reports from Landsystems and AgFirst are provided within **Attachments S** and **T**.

5.7.1.1 Soil Classification

The soil classification of the respective land is largely agreed with Auckland Council, however, queries have been raised as to the extent of on-site mapping and desk top surveys. Due to access arrangements, detailed desk-top mapping has been undertaken as opposed to on-site surveys. Following the original application, this has been re-examined with the memo from Landsystems stating:

'The more detailed mapping revealed an isolated area of approximately 4.25 ha of low quality pasture within the surrounding race track. This pasture is further fragmented by farm races, which are evident from the aerial imagery. The area is used for grazing, most likely horses and based on historic aerial photography available on Google Earth has been in Pasture since at least 2005 The fragmentation and shape of this 4.25 ha area reduce its potential for versatile agricultural production, and its isolation from other productive land makes it difficult to manage and amalgamate with surrounding productive land.'[29]

5.7.1.2 Managing Wetness Limitations

Auckland Council also consider that the wetness limitation of the soil can be managed through drainage and soil management techniques. This is addressed within paragraphs 1.4 to 1.8 of the memo from Landsystems which outlines that the soils are not favourable for cultivation or root development, and states:

'When drained and fertilised, the soils are suitable for pasture growth in autumn and spring, but summer yields may be limited by dry topsoil, and winter yields can be limited by saturation and pugging.

…

The Auckland Unitary Plan's own definition of "prime soil" requires "good drainage" and "versatile soils easily adapted to a wide range of agricultural uses", criteria the majority of the site's soils do not meet (Singleton, 2020 – p 14-15).'[30]

[28] Memorandum of Strategic and Planning Matters for Auckland Council – Para 323, Issue 6
[29] Response to Auckland Council Specialist Memos – Landsystems – Attachment S – Para 3.4
[30] Response to Auckland Council Specialist Memos – Landsystems – Attachment S – Para 1.7

5.7.1.3 Land-Based Primary Production

It has been suggested by Auckland Council that the land is suitable for continued use in land-based primary production, including horticulture, as well as having slight to moderate limitations for arable use. This is addressed within paragraphs 2.2 to 2.5 of the memo from Landsystems which outlines that this is overstated and does not factor in the site-specific soil characteristics and its inherent limitations.

AgFirst has undertaken a productive and economic analysis to determine the suitability of the Mixed Rural zoned land for land-based primary production. The AgFirst report summarises its findings and states:

'the financial return based on a highest and best land use shows a significant deficit, with projected net losses for every individual property, regardless of them being amalgamated in an attempt to form an economic unit. These substantial deficits indicate that the long-term viability of these operations is unsustainable, and would not be viable today not in 30 years.

Significant constraints for land-based primary production have been identified which affect the Development Site, including:

- *Surrounding land-uses to the south and west are zoned as residential and FUZ, with land to the east zoned as special purpose zone for Ardmore Airport and other highly fragmented rural zoned areas.*
- *Soil conditions*
  - *Very poorly and poorly drained soils, causing reduced yields and limited carrying capacity.*
  - *Lad unsuitable for alternative higher value land-based primary production.*
- *Limited expansion or improvement options*
  - *Due to physical boundaries and lack of amalgamation opportunities.*
- *An indicative budget across the entire Development Site under pastoral grazing and arable land-use, using industry information shows this is not economically viable with a revised net individual property loss of between -$220,745 and -$29,010 or a Development Site cumulative loss of -$1,455,813 or -$9,029.98 per effective ha.*
- *The land has been valued not on the land-based primary production or quality of the soil and land, but on the location of the property. This block will not be purchased for the purpose of land-based primary production nor will it ever be used as a commercial farming enterprise with the purpose of making profit solely off the land.'*[31]

[31] Sunfield NPS-HPL Assessment – Agfirst – Attachment T – Executive Summary, Pages 3-4

Therefore, the overall analysis of productive soils within the original application continues to be appropriate, with it being considered that the proposed urbanisation and subdivision of the land can be progressed as Clause 3.10 of the National Policy Statement – Highly Productive Land is satisfied.

5.7.2 Proposed Conditions

Given the nature of the adverse effect and subject proposal, conditions are not proposed to mitigate this effect.

5.7.3 Section 85(3) Assessment

The land subject to this proposal, when reviewed in detail, is generally land not of high production value given the heavy clay soil textures and wetness limitations. Urbanisation is therefore considered appropriate, with the effects associated with a loss of productive land being mitigated by an alternative, more appropriate land-use. The proposed location of MR2 further increases the logic of this area being developed into an urban area, with the corridor providing a clear and obvious edge between urban and rural activities.

It is therefore considered that the loss of this land for productive purposes is an acceptable effect, with this not being an adverse impact that needs to be supported by a 'proportionality test' or 'balancing assessment' with the regional benefits associated with the Sunfield development.

5.8 Urban Form / Character

5.8.1 Commentary

Auckland Council have raised urban design concerns with Sunfield, with many of these concerns being addressed and considered under other parts of the original application and section 5 of this report, such as transportation, noise and geotechnical (density), and open space matters.

At 40 dwellings per hectare, it is considered that the residential neighbourhoods in Sunfield are medium density, not 'low density' as suggested by Auckland Council. This is also in a context where a range of housing typologies are provided, ranging from stand-alone dwellings, semi-detached dwellings, apartments within the hubs, and retirement village units providing choice and differing price points. This outcome is supported by the car-free street network, which significantly reduces land requirements for road infrastructure and on-site parking.

The updated Masterplan, Precinct Plans and associated Neighbourhood Plans are contained within **Attachment C**, which provide additional detail as to the nature and functionality of the residential neighbourhoods and laneways.

Commentary from Studio Pacific is provided within **Attachment C4**, which includes a Landform Plan with a cross section of Old Wairoa Road (**Attachment C9**), and an Active Modes Plan (**Attachment C10**).

5.8.2 Proposed Conditions

Conditions are proposed regarding the provision of additional detail prior to construction. Of particular note are conditions 28 to 30 requiring a site plan and façade components outlining the specifications for each building within a stage. This is to ensure the buildings are of an appropriate quality and in line with the Residential Design Controls for Sunfield.

5.8.3 Section 85(3) Assessment

As outlined within the original application, it is considered that the design philosophy and envisaged urban design outcomes will create a sustainable and 'liveable' community. It is therefore considered that there are minimal adverse effects with this being a pleasant environment to live, work and play.

5.9 Parks and Reserves

5.9.1 Commentary

Auckland Council have raised concerns with the location of the proposed formal recreation areas being within flood affected location, and that three additional neighbourhood parks should be provided, each with a minimum size of 2,500m^2 to 3,000m^2.

It is considered that stormwater management areas and open space areas can overlap with it being an efficient use of land given the dual purpose, with examples already occurring within Auckland such as Awakeri Wetlands Stage 1, and Greenslade Reserve, Northcote. An Open Space Flood Plan is provided within **Attachment C6** which illustrates the effect on these areas from a 10 year event, and the inundation time for a 2 year and 10 year event (with climate change). This is illustrated in **Figure 13** below.

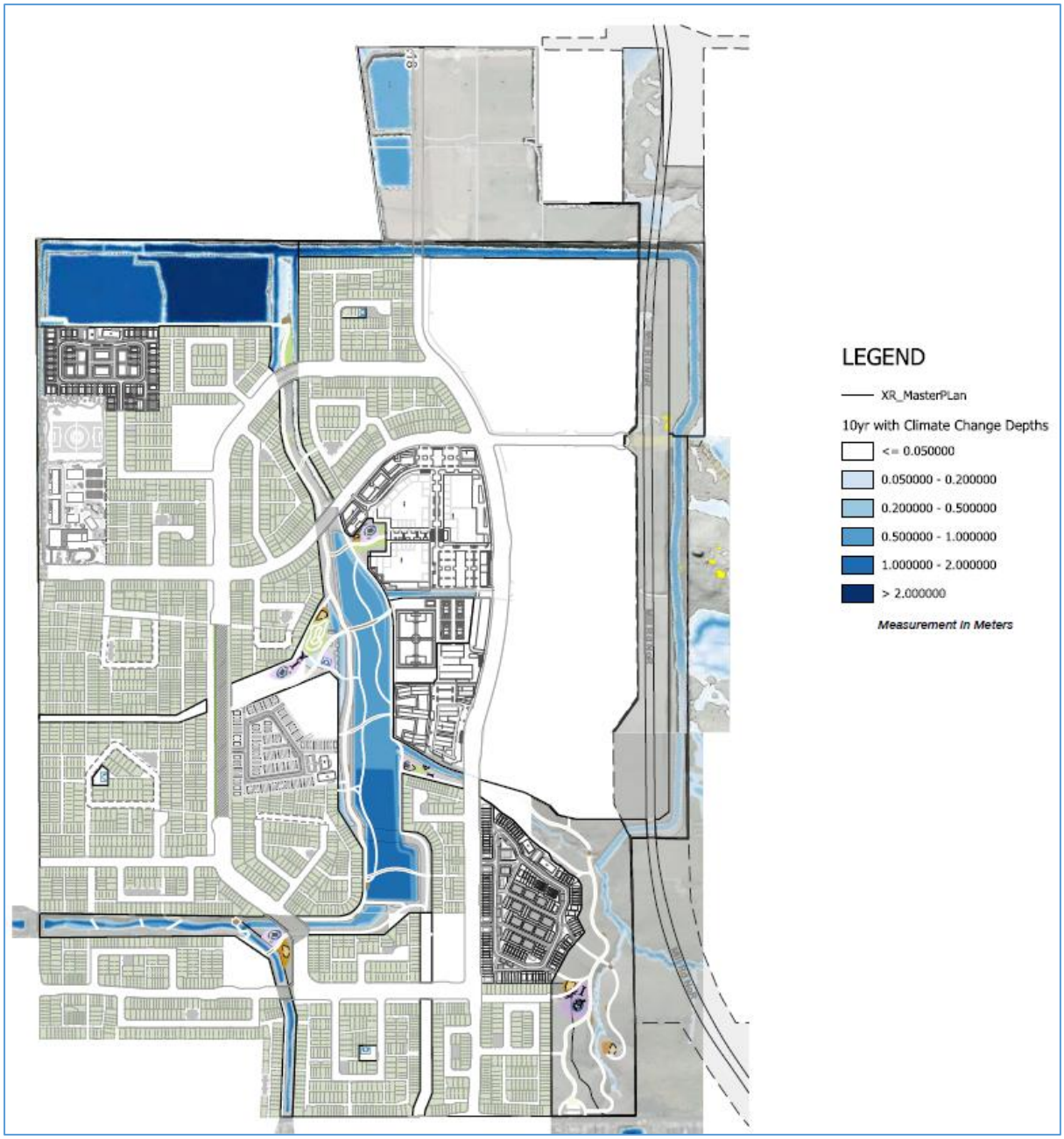

Figure 13: Open Space Flood Depth Plan *(Source: Maven)*

The open space strategy within Sunfield is positive and there are also a range of parks within the immediate area, including the 65ha Bruce Pullman Reserve approximately 420m away from Sunfield. The 53ha of open space provides for a range of formal and informal recreation opportunities, however, following the feedback from Auckland Council, the applicant has incorporated three additional neighbourhood parks, as illustrated in **Figure 14** below, which is taken from the Open Space Plan in **Attachment C6**. The figure shows the additional parks in the northern, western, and southern portions of Sunfield and the collective arrangement of open spaces and respective catchments. As illustrated below, good accessibility to open space areas for all residential locations is provided, with the three additional parks considered to enhance this offering.

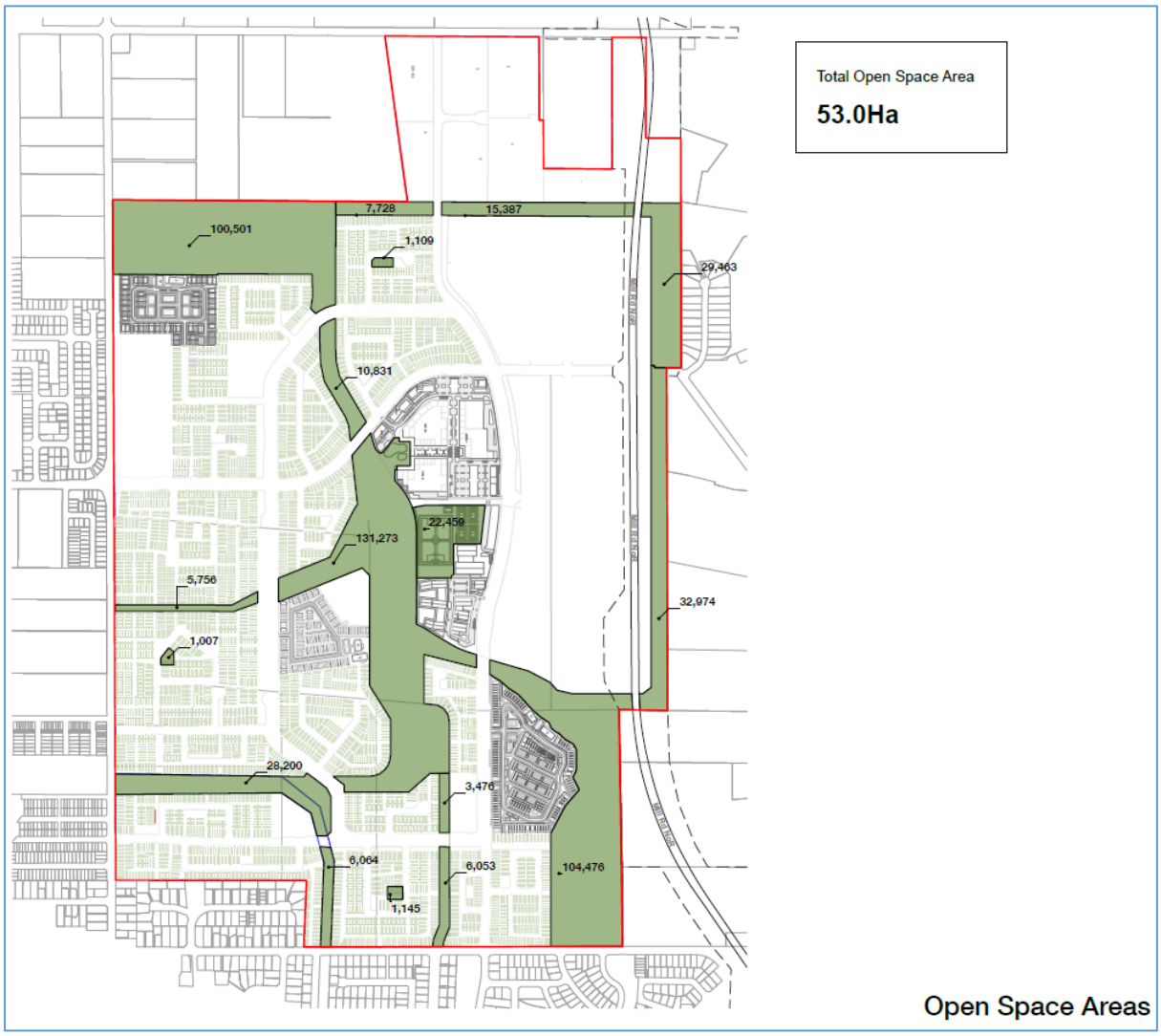

Figure 14: Amended Open Space Masterplan *(Source: Studio Pacific - Masterplan)*

5.9.2 Proposed Conditions

The proposed conditions ensure that the open space areas are appropriately designed and landscaped at the detailed design stage (conditions 31, 121, 163 and 164) and in turn constructed and implemented at the subdivision stage (conditions 180 – 190).

Detailed comments were provided from Auckland Council (Parks) on the proposed conditions, with amendments being made to a range of the proposed conditions. Additional conditions have also been incorporated (195A – 197B) regarding boundary treatments and retaining walls and associated consent notices.

5.9.3 Section 85(3) Assessment

Therefore, based on the original application, the amendments to the open space layout with three additional neighbourhood parks, and the proposed conditions put forward with the application, it is considered that adverse effects associated with open space are negligible.

5.10 Groundwater

5.10.1 Commentary

Concerns have been raised by Auckland Council regarding the level of information provided, and that only groundwater effects associated with Awakeri Stages 2 and 3 have been considered.

A subsequent addendum report from LDE Limited is provided within **Attachment L**. The risk register within the report outlines that groundwater drawdown risks are low. Section 3.2 of this report goes on to provide an assessment of groundwater drawdown effects across the Sunfield area, as well as a compliance assessment against Chapter E7 of the AUP regarding groundwater. This has led to the reasons for consent, as outlined under section 3.4 of this report, being updated.

The LDE report states in regard to groundwater drawdown and settlement:

*'…, we consider that the anticipated groundwater drawdowns will have a negligible effect on any neighbouring structures. A programme of preloading is also proposed following bulk earthworks, which will allow any settlements induced by groundwater drawdown to attenuate prior to construction of end use structures. **Groundwater drawdown should therefore be dismissed as a geotechnical issue...***

*'No retaining walls are proposed as part of the development (i.e. retaining structures are limited to box culverts, bridge abutments, etc.), and as such mechanical settlement resulting from retaining structures is dismissed as a geotechnical issue. Based on this consideration and the above drawdown assessment, **a Groundwater Settlement Monitoring and Contingency Plan (GSMCP) is not considered necessary for the proposed development.**'*[32]

The LDE report and assessment has been reviewed by Earthtech, **Attachment M,** and states:

[32] Addendum Geotechnical Assessment Report – LDE – Attachment L – Section 3.2, Pages 6-7

'Based on the predicted groundwater drawdowns and resulting ground settlements assessed by LDE (2025), we agree with LDE's conclusion that monitoring of structures, services or groundwater levels is not warranted for this proposal, based on the current surrounding built environment and a permanent water depth being maintained in stormwater ponds and channels to limit groundwater drawdowns.'

5.10.2 Proposed Conditions

Whilst the LDE report in **Attachment L** outlines that a Groundwater Settlement Monitoring and Contingency Plan (GSMCP) is not necessary, it is recognised that groundwater is a consideration for the site, with peat soils being present. Therefore, in order to take a precautionary approach, the proposed conditions in **Attachment B** still contain proposed groundwater conditions, which include minor updates.

5.10.3 Section 85(3) Assessment

Therefore, based on the additional information from LDE, with appropriate separation distances from neighbouring properties and the proposed precautionary conditions put forward with the application, it is considered that these adverse effects can be appropriately managed and mitigated to an acceptable level.

5.11 Provision of Mill Road – Stage 2 (MR2)

Commentary has been received from a number of parties regarding the integration with MR2 and the recently issued NoR. This has been addressed under section 3 of this report.

5.12 Infrastructure Provision and Servicing

5.12.1 Commentary

Concern has been raised, predominantly by Auckland Council, that the proposal development comes at the expense of the delivery of other developments and displaces planned investment for live zoned areas[33]. Infrastructure provision itself is addressed elsewhere in this response report and concern has been raised by Auckland Council that there is insufficient certainty as to where these costs lie[34].

This matter is essentially drawing on the appropriateness of this greenfield area being utilised for urban growth, and its alignment to the Future Development Strategy 2023. As outlined within the original

[33] Memorandum of Strategic and Planning Matters for Auckland Council – Para 323, Issue 11
[34] Memorandum of Strategic and Planning Matters for Auckland Council – Para 323, Issue 12

application, the deferral of this area being acceptable for urban growth is largely a financially driven decision, not a planning one, with this greenfield area being a logical location for urban growth, which is even more compelling given the alignment of the proposed MR2 corridor.

It is confirmed that the applicant would be willing to enter into an Infrastructure Funding Agreement (IFA) with Council and other infrastructure providers, subject to appropriate offsets for Development Contributions. The infrastructure upgrades that the applicant would fund is all infrastructure within the Sunfield development site itself, and those infrastructure upgrades external to the site required under the staging conditions, being numbers 120, 123, 175, and 176, the details of which can be confirmed within an IFA.

It is therefore considered that the effects associated with displacing planned investment will not arise, as the applicant will effectively provide the required infrastructure that is needed to develop the Sunfield site. Whilst it is recognised that further detailed discussions are required to formalise an IFA, clarity is provided above as to the extent of the infrastructure upgrades the applicant anticipates funding.

5.12.2 Proposed Conditions

A number of conditions are proposed which outline what infrastructure is to be provided and when. For example, the staging conditions (120, 123, 175, and 176) outline what infrastructure must be constructed and operational prior to any building within that respective stage being occupied. It is therefore in the interests of the applicant to have the prerequisite infrastructure in place (and paid for), otherwise the development will not succeed. In simple terms, people will not purchase a house if there is no infrastructure. These conditions will therefore manage the effects (and in turn funding) of the associated infrastructure required to implement the Sunfield development.

Specific conditions, as outlined by Auckland Council[35], regarding certainty of infrastructure funding and financing are not considered necessary, particularly confirming that the infrastructure will not displace planned investment in other areas of Auckland. These suggestions do not appear to align with Section 83 of the FTAA as these conditions appear more onerous than necessary, or sections 108 and 108AA of the RMA (as required by Clause 18 of Schedule 5 of the FTAA) as they do not address adverse effects. It is therefore considered that the proposed conditions of the applicant adequately address this matter.

[35] Memorandum of Strategic and Planning Matters for Auckland Council – Para 337, Issue 11

5.12.3 Section 85(3) Assessment

Therefore, given the proposed infrastructure will be able to adequately service the Sunfield development (as outlined within sections 5.2 to 5.5 above and within the original application), and the proposed conditions provide checks and balances as to when this infrastructure is constructed and operational (and ultimately who funds it), it is considered that this adverse effect can be appropriately managed.

5.13 Noise Effects (Ardmore Airport) – Ardmore Airport

5.13.1 Commentary

Feedback has predominantly been received from Auckland Council and Ardmore Airport regarding the potential noise effects associated with Sunfield. A subsequent response memorandum from Styles Group is provided within **Attachment K**.

In summary, there is considerable agreement between the acoustic specialists for the applicant and Auckland Council, with Mr Gordon from Auckland Council supporting the application from a technical acoustic perspective in recognition of the design of the development and mitigation proposed[36].

There is recognition from both acoustic specialists for the applicant and Auckland Council that the urban form and density considerations are outside the expertise of acoustic specialists. These matters have been addressed within the original application[37] which outlines that the land use response, including between the 55 dB Ldn and 60 dB Ldn contours, is appropriate. This is in recognition of the alignment with the established density of existing residential development on the western side of Cosgrave Road that is also inside the 55 dB Ldn and 60 dB Ldn contours, and that large areas of publicly accessible open space are located outside of the 55Ldn contour to the north-west and south-east providing for passive recreation and allowing people to enjoy the outdoors.

With regard to the feedback received from Ardmore Airport, the response memorandum from Styles Group addresses this commentary and outlines a number of areas of disagreement and ultimately *'that the adverse effects at Sunfield will be somewhat less than what is described in the MDA Review.'*[38]

[36] Auckland Council Noise and Vibration Feedback 17.20 – Annexure 20 – Page 5 – Paragraph 20
[37] FTAA Sunfield Substantive Application – Planning Report – Section 7.13.1 – Page 155
[38] Noise Response Memorandum – Styles Group – Attachment K – Section 3, Page 11

Finally, the feedback received from MC Investments (NZ) Ltd[39] is also noted, in that prospective purchasers and occupiers have the opportunity to make personal choices as to where they live, with Ardmore Airport and the associated aircraft movements being a known and existing feature of the area.

5.13.2 Proposed Conditions

A number of proposed conditions seek to mitigate the reverse sensitivity effects associated with noise from Ardmore Airport affecting Sunfield residents. This includes:

- Condition 141 – Restricting activities within the respective Aircraft Noise Contour Boundaries.
- Condition 142 – The construction and design requirements of new buildings and additions to achieve the required internal noise environment.
- Condition 143 – A covenant to be placed on records of title stating that the acoustic treatment measures required by condition 142 should not be altered without the Ardmore Airport operator's consent.
- Conditions 213 and 214 – No complaint covenants regarding aircraft noise to be placed on all titles within the Sunfield development.

Following the feedback being received, amendments have been made to these proposed conditions, which aligns with the feedback received from Auckland Council. This includes adding condition 141A to state that no dwellings or healthcare facilities with overnight stays are to be located within the 60dB and 65dB contours, and the removal of condition 142(c) to alleviate potential inconsistencies in the specified ventilation requirements.

5.13.3 Section 85(3) Assessment

Therefore, given the proposed land-use response in relation to the relevant aircraft noise control boundaries and the proposed conditions which provide the necessary restrictions for activity location and building design, it is considered that this adverse effect is appropriately mitigated.

[39] Feedback from MC Investments Ltd – Number 15 – Bullet Point 4

5.14 Safety (Ardmore Airport) – Ardmore Airport

5.14.1 Commentary

Concerns have been raised by Ardmore Airport regarding safety risks to the public, pilots and in turn aircraft, particularly the risk of an aircraft having failure or sudden lack of engine performance, with Ardmore Airport stating that this is more likely to happen during take-off with training and simulation of this scenario happening over Sunfield.

Ardmore Airport have also outlined their future planned business and industrial development, which will no doubt have to consider airport safety effects. This planned development of Ardmore Airport is considered complementary to Sunfield, which abuts the Employment Precinct, a similar land-use which will ensure appropriate integration.

Following the s53 feedback being received, a memorandum is provided from L+R Airport Consulting and attached as **Attachment J**, which states:

'Ardmore Airport have raised, specifically, the risk of aircraft having failure or sudden lack of engine performance, with this more likely to happen during take-off over Sunfield. This matter is factored into the airport safeguarding and the AUP restrictions, specifically the Rural Aerodrome Protection Areas of which Sunfield Development adheres to.'

The memo concludes:

'In summary, we believe that the Sunfield masterplanned community has been planned according to and adheres to NZ and Australian airport safeguarding guidance and can co-exist successfully with Ardmore Airport.'

5.14.2 Proposed Conditions

On top of the design response, and the appropriate location of land-uses and bulk of buildings, there are a number of proposed conditions, which will ensure any adverse effects are mitigated. This includes a wildlife management plan, compliance with height controls, air discharge and lighting requirements contained within conditions 96 to 101.

Lighting condition 99A has been added following feedback from Auckland Council, which includes the requirement to submit a completion report confirming the lighting design layouts and specifications have been installed in accordance with the required lighting plan and relevant standards.

Ardmore Airport generally supports the planted buffer along the eastern boundary, however requests that consultation occur with Ardmore Airport over the detail of the planting, and suggest conditions 31 and/or 98 are updated accordingly. This has been considered, and noting condition 98 is clear as to the intended objectives of the wildlife management plan, a small amendment is proposed specifically referencing plant species as an implementation method to reduce bird populations. An additional requirement of condition 31 is proposed (31l), requiring specific details of planting and landscape maintenance within the Designation 200 – Ardmore Airport height restriction area, to ensure compliance with these controls (as outlined within condition 96).

5.14.3 Section 85(3) Assessment

Therefore, based on the design response, and the proposed conditions put forward with the application, it is considered that these adverse effects can be appropriately managed and mitigated to within acceptable parameters.

5.15 Conclusion

It is considered that all of the potential adverse effects associated with the Sunfield development can be managed to acceptable levels based on the proposed land-use response, design and layout of the Sunfield development, infrastructure provision, and the proposed conditions mitigating any residual adverse effects. Therefore, when assessing the application in line with the section 85(3) requirement of the FTAA, there are considered to be no adverse impacts which require a 'proportionality test' or 'balancing assessment' against the regional benefits of the proposal.

6 INFORMATION REQUIREMENTS

6.1 Context

This application is a substantive fast-track application under the FTAA for a listed project. Section 42(1)(a) outlines that only 1 substantive application for the project may be lodged with the Environmental Protection Agency.

The Sunfield development project is located across 244.5 hectares of contiguous land, and is proposed to contain a range of activities including commercial, industrial, residential, recreational, educational and a town centre. This is probably the largest resource consent development proposal ever considered within the New Zealand context, which is acknowledged by Auckland Council. Therefore, the approach and consenting strategy required careful consideration, particularly regarding the level of information provided as part of the submitted application, and what could form part of the conditions of consent.

Ultimately, a balance between providing high-level quality information as part of the application and allowing the details to be provided as part of the conditions was opted for, including a range of management plans. A detailed planning report, with a suite of comprehensive proposed conditions, and 49 attachments, many of which were detailed technical reports, were provided with the original application. It is considered that this allows the scope, parameters, effects, and essential information to be clearly understood, with the detailed elements and design responses to be worked through at a later date in the knowledge that the over-arching issues can be resolved, recognising the scale of the proposal.

It is, however, recognised that key information should be provided that enables a better understanding of the adverse effects and regional benefits, where this potentially impacts decision-making.

6.2 Auckland Council Feedback

Auckland Council has raised concerns about possible gaps within the information provided to date[40]. Whilst it is recognised that Auckland Council have endeavoured to assess the level of risk associated with the perceived information gap, it is felt some of the identified information is disproportionate to the extent of the adverse effects and the context and scale of the Sunfield development. The applicant has, however, endeavoured to respond to these matters. The below table therefore summarises the Auckland Council concerns, along with an applicant comment.

[40] Memorandum of Strategic and Planning Matters for Auckland Council – Para 338-340

No.	Council Feedback	Comment
1.	**Stormwater:** Treatment options for high contaminant generating car parks.	The high contaminant generating car-parks have been considered under section 5.2.1.6 of this report.
2.	**Ecology:** Wetland delineation data.	Auckland Council recognise that this is a minor point of clarification, and that there is general agreement on the delineation of the wetland. It has been confirmed within the Ecology Report, **Attachment I**, that the wetland was delineated via a 'rapid test' due to the dominance of facultative wetland and obligate plants[41].
3.	**Ecology:** The calculated length of stream diversion is not quantified.	This has been provided within the Ecology Report, **Attachment I**, and confirmed that the proposed development includes the diversion of 2,220m of modified permanent stream to a new alignment. The final diverted stream length will comprise 4,447 m of linear stream bed[42]. An assessment of this stream diversion is also provided within the attached Ecology Report.
4.	**Ecology:** No ecological effects of stream diversion are assessed.	
5.	**Transport:** Lack of intersection modelling.	Updated information has been provided regarding intersection modelling, with an assessment of the traffic modelling completed by NZTA for the various scenarios involving the Sunfield development and the MR2 proposal, **Attachment H**. This has led to an updated staging and monitoring condition (123 and 123A) for intersection upgrades and analysis.
6.	**Transport/ Stormwater:** Road runoff treatment meeting requirements not demonstrated.	Maven have addressed this within the Stormwater and Flooding Response Report, stating: *'All public roads are designed to drain to a proposed wetland. The wetlands are proposed as the primary stormwater treatment solution due to their proven effectiveness in removing contaminants and their alignment with Auckland Council's GD01 – Stormwater Management Devices in the Auckland Region (2017/001).'*[43]
7.	**Transport/ Stormwater:** Major culverts do not meet engineering standards.	Auckland Council have questioned the size of the culverts under the primary or secondary collector roads and whether these comply with the NZTA Bridge Manual. This appears an engineering compliance matter, as opposed to an information gap and understanding the associated effects, however, Maven have addressed this and state: *'The Maven M-C4400 Series plans include detailed culvert layouts and dimensions. These demonstrate that sufficient*

[41] Ecological Assessment Report – Bioresearches – Attachment I – Page 6
[42] Ecological Assessment Report – Bioresearches – Attachment I – Page 3
[43] Stormwater and Flooding Response Report – Maven – Attachment N – Page 46

		spatial allowance has been provided to accommodate larger culvert sizes if required during the detailed design phase, ensuring flexibility for hydraulic performance optimisation and compliance with council standards.'[44]
8.	**Transport/ Stormwater:** Fish passage assessments not provided.	Whilst this has been identified as a 'Transport/Stormwater' matter, it is noted that fish passage has been considered by the respective ecologists. As outlined under number 4 above, a streamworks assessment is provided within the Ecology Report, **Attachment I**, with fish passage forming part of this assessment[45]. Fish passage conditions in line with the NES:FW have also been added to the proposed set of conditions (particularly 95C and 95E), as suggested by Auckland Council's ecologist, which will ensure adverse effects are appropriately mitigated.
9.	**Transport/ Stormwater:** Culvert blockage assessment not provided.	Culvert blockages have been considered by Maven, who note: *'The proposed culverts are located between two public swales and are situated exclusively beneath road corridors. In the event of a blockage, stormwater would surcharge and overtop the road surface, subsequently discharging into the downstream swale. This configuration ensures that overland flow paths remain functional and contained within the designated stormwater network.'*[46] Culvert blockages will also be considered at the detailed design phase to ensure compliance with Auckland Council's Stormwater Code of Practice.
10.	**Transport/ Stormwater:** Culvert and bridge access space not allowed for.	Maven have considered this query and advise: *'All proposed culverts are accessible via public road reserve, ensuring adequate access for inspection, maintenance, and future upgrades.'*[47]
11.	**Transport/ Stormwater:** Detail of overland flowpaths within proposed roads not provided.	Overland flow paths within the road have been addressed within the Stormwater and Flooding Response Report, **Attachment N**, noting the commentary contained within section 5.2.1 of this report, and the proposed conditions as outlined in section 5.2.2 of this report.
12.	**Landscaping:** Detailed landscape plans have not been provided.	Whilst acknowledged as low risk by Auckland Council, it is considered that the suite of plans, including the Masterplan, Neighbourhood Plans, Open Space Strategy (with planting

[44] Stormwater and Flooding Response Report – Maven – Attachment N – Page 46
[45] Ecological Assessment Report – Bioresearches – Attachment I – Page 8
[46] Stormwater and Flooding Response Report – Maven – Attachment N – Page 47
[47] Stormwater and Flooding Response Report – Maven – Attachment N – Page 47

		palette) and the Sunfield Planting Palette (Document 3p) of the original application provide appropriate detail as to the landscape design. This is also in the context of landscape plan requirements as part of the conditions (31).
13.	**Urban Design:** Hierarchy and legibility of laneways and hubs is not clear.	The updated Masterplan, Precinct Plans and associated Neighbourhood Plans are contained within **Attachment C**, which provide additional detail as to the nature and functionality of the residential neighbourhoods and laneways.
14.	**Air Discharge:** No assessment of chapter E14 of the AUP(OP) is provided (Policy E14.3(10)).	Auckland Council recognise this is low risk and confirmation is preferable. As per the original application, it is acknowledged that land-use activities within the employment precinct, and in turn air discharges, will need to be controlled. Proposed condition 96 outlines a specific requirement for air discharge velocities within the proximity of Ardmore Airport. This is considered to provide certainty of outcome, and mitigates the adverse effects associated with air discharge in line with Policy E14.3(10).

It is therefore considered that the relevant information regarding the nature of the associated adverse effects and regional benefits has been provided, and is proportionate to the context and scale of the proposal.

6.3 Iwi Feedback

Whilst not a comment as such on the level of information provided, the following iwi have provided feedback on the proposal, and the level of engagement with iwi that has occurred regarding the Sunfield project and Fast-track application:

- Te Akitai Waiohua Settlement Trust and Te Akitai Waiohua Waka Taua Incoporated
- Ngāi Tai ki Tāmaki
- Te Whakakitenga o Waikato Incorporated (Waikato-Tainui)

These matters have been addressed within the three memoranda from Navigator Limited attached as **Attachment V**.

7 Decision Making Framework and Assessment

The FTAA has a specific and defined decision-making framework. This is outlined within the legal memorandum from Bronwyn Carruthers KC. The below assessment therefore reflects the preceding planning analysis in the context of this decision-making framework.

7.1 Section 81 – Decisions on approvals sought in substantive application

Section 81(1) of the FTAA requires the Panel to grant the approval (and set conditions) or decline the approval, with Section 81(2) setting particular parameters for the purpose of making the decision and cross-referencing other parts of the FTAA. Of note is sections 81(2)(b) which outlines particular clauses which must be considered and section 81(2)(f) which outlines that the panel may decline an approval only in accordance with section 85.

Section 81(2)(b) outlines that the panel must apply the applicable clauses set out in section 81(3), and draws attention to the weight to be given the FTAA, as per the below:

(b) must apply the applicable clauses set out in subsection (3) (see those clauses in relation to the weight to be given to the purpose of this Act when making the decision):

Section 81(3) states that for resource consent applications, clauses 17 to 22 of Schedule 5 of the FTAA are the respective clauses that must be considered.

Section 81(4) states that when taking the purpose of the FTAA into account when considering clauses 17 to 22 of Schedule 5 of the FTAA, the panel must consider *the extent of the project's regional or national benefits.*

7.1.1 Clause 17 – Criteria and other matters for assessment of consent application

Clause 17(1) outlines what the panel must take into account, as per the below:

(1) For the purposes of section 81, when considering a consent application, including conditions in accordance with clauses 18 and 19, the panel must take into account, giving the greatest weight to paragraph (a),—

(a) the purpose of this Act; and

(b) the provisions of Parts 2, 3, 6, and 8 to 10 of the Resource Management Act 1991 that direct decision making on an application for a resource consent (but excluding section 104D of that Act); and

(c) the relevant provisions of any other legislation that directs decision making under the Resource Management Act 1991.

This clause therefore states that the greatest weight needs to be given to the purpose of the FTAA, which is 'to facilitate the delivery of infrastructure and development projects with significant regional or national benefits'. Section 81(4) clarifies that when taking the purpose of this Act into account, panel must consider the extent of the project's regional or national benefits. These regional benefits have been outlined within section 4 of this report, and in summary the proposal will provide significant regional benefits which are both economic and non-economic.

It is worth noting that the concept of the greatest weight being given to the purpose of the FTAA is clearly stated within two parts of the decision-making framework, section 81(2)(b) and clause 17(1)(a), which accentuates the importance of this requirement.

Therefore, when taking into account Parts 2 (sections 5, 6 and 7), 3, 6 and 8 to 10 of the RMA, lesser weight is given to these provisions. These provisions have been assessed under the original application and remain valid with the application achieving the purpose of the RMA, as the proposal will promote the sustainable management of natural and physical resources, provides a stormwater system which manages flooding risk, and will provide for the communities social, economic and cultural well-being.

Clause 17(1)(b) specifically excludes the non-complying gateway tests in s104D from consideration.

Clause 17(3) and (4) relates to provisions of the RMA that would require a decision maker to decline an application, for example a prohibited activity. In these circumstances, the panel must "take into account that the provision (that would normally require an application to be declined) would normally require an application to be declined, but must not treat the provision as requiring the panel to decline the application the panel is considering". For the avoidance of doubt, there are no provisions within the RMA applicable to this application that require the application to be declined, with all applicable provisions having an element of discretion.

7.1.2 Clause 18 – Conditions on resource consent

Clause 18 of the FTAA states that the provisions of Parts 6, 9 and 10 of the RMA are relevant when setting conditions on a consent. In accordance with Clause 17(1), when setting conditions of consent, greatest

weight is to be given to the purpose of the Act, again providing clear direction as to the importance of the weighting requirement.

7.1.3 Section 85 – When panel must or may decline approvals

Pursuant to sections 85(1) and (2) of the FTAA, there are considered to be no circumstances in which the application must be declined.

Sections 85(3) to 85(5) outline the requirements for when approval *may* be declined if the adverse impacts are 'sufficiently significant to be out of proportion to the project's regional or national benefits' even after taking into account any conditions or modifications.

7.1.3.1 Section 85(3) Summary

Section 85(3) of the FTAA states:

(3) A panel may decline an approval if, in complying with section 81(2), the panel forms the view that—

(a) there are 1 or more adverse impacts in relation to the approval sought; and

(b) those adverse impacts are sufficiently significant to be out of proportion to the project's regional or national benefits that the panel has considered under section 81(4), even after taking into account—

(i) any conditions that the panel may set in relation to those adverse impacts; and

(ii) any conditions or modifications that the applicant may agree to or propose to avoid, remedy, mitigate, offset, or compensate for those adverse impacts.

Therefore, when considering the application under section 81(2), the panel must form a view under section 85(3)(a) whether there are 1 or more adverse impacts in relation to the approval sought. Section 85(5) outlines that an adverse impact is any matter that "weighs against granting the approval". As outlined within section 5.15 of this report, it is considered that the adverse effects can be managed to within acceptable levels. Therefore, there are no adverse impacts that weigh against granting the approval and a 'proportionality test' or 'balancing assessment' against the regional benefits of the proposal is not deemed necessary.

7.1.3.2 Section 85(4)

Section 85(4) of the FTAA states:

(4) To avoid doubt, a panel may not form the view that an adverse impact meets the threshold in subsection (3)(b) solely on the basis that the adverse impact is inconsistent with or contrary to a provision of a specified Act or any other document that a panel must take into account or otherwise consider in complying with section 81(2).

This is a clear indication that the FTAA envisages consent being granted to projects that are either contrary to or inconsistent with the planning documents, and suggests that the primary consideration is the adverse impact itself and not the provision of a specified Act or other document that a panel must take into account. This also further emphasises the dominance of the FTAA provisions.

7.2 Section 81(1) Conclusion

Therefore, based on the preceding assessment contained within this report, it is considered that:

- the proposal will have significant regional benefits;
- the adverse effects can be managed to within acceptable levels, and therefore there are no 'adverse impacts' that weigh against granting the approval.
- whilst lesser weight is given to Parts 2 (sections 5, 6 and 7), 3, 6 and 8 to 10 of the RMA, the proposal is consistent with these provisions.

Overall, it is therefore considered that Sunfield can be approved in accordance with section 81(1)(a) of the FTAA.

Report prepared by:

Ian Smallburn

Planning Consultant

Tattico Limited