

15 October 2025

Attachment A – Applicant Section 55 Response to Comments Received from Invited Parties Under Section 53 – FTAA-2503-1039

The purpose of this table is to provide responses to the comments received in relation to the Sunfield Masterplanned Community on 4 August 2025. This summary table is to be read in conjunction with the originally submitted application lodged 3rd April 2025, the additional information in response to Minute 3 of the Expert Panel submitted on 17th July 2025, and the Section 55 FTAA information package.

The below table is a succinct response to the key queries and themes raised, which are in summary form, with key text being taken directly from the feedback received from invited parties. The feedback column in the below table does not provide all of the text associated with the respective comment and is to be used as a guide only, to provide appropriate context. Please refer to the submitted documents from invited parties for the full text.

The Applicant notes that the proposal has been updated to reflect the section of Mill Road Stage 2 which is proposed to be constructed on part of the Sunfield Masterplanned Community, which is detailed within the Section 55 Planning Response Report.

Comment No.	Comment From	Theme	Comments	Applicant Response
1.	Minister For the Environment			
1.1	Minister For the Environment	General	Please be advised that Minister Simmonds has reviewed this application and does not wish to provide comment.	Noted
2.	Ruby Pearce – [REDACTED] (external neighbour)			
2.1	Ruby Pearce	Car-free Community	A car free concept is good in thoery, but just like the theory that our "carless days" would work in the 1979/1980 era, people circumvented the system and it just did not work. Kiwis love their cars, and it would involve already having trusted and existing infrastructure for this to work. Setting this up without the existing system is setting you up to fail, and the people impacted will be the tenants that rent homes from absent landlords that have brought into an affordable subdivision that will have multiple cars for each dwelling. Addison in Takanini is a prime example where 5 bedroom homes have 5+ cars for each occupant; multiple cars are parked outside, garages are full, off street parking is full to overflowing with the risk of blocking roads and illegal parking. Telling people they can't park there will not work, and enforcement may occur, but the incidents will continue. It just looks like a developer is trying to earn more \$\$\$ by selling accommodation by not providing sufficient car parking spaces for each dwelling that it builds. At a minimum EVERY SINGLE DWELLING MUST HAVE AT LEAST ONE OFF STREET CAPARK. If this is not included in the Council zoning or urban plans then it should be. Once the infrastructure is developed, then and only then should you be in a position to allow this type of arrangement in an existing development. I have not heard of one single high density development where this has worked. Parking will always be an issue if it is not allowed for right at the beginning. And if you say use public transport - the development is in a rural area - and saying you will create it, does not say that it works. Build the first few stages first that includes parking, create the public transport, and then start creating an environment that can support a car free area. And I haven't decided to mention visitors and where they will be parking in the 3000+ houses you plan to build. The main thing to think about for me is who are they planning to sell these homes to - is it only to investors, that will then rent them out to tenants; or do you want to sell these homes to first	Transportation matters, including the concept of a car-less community have been outlined and addressed within previously submitted information by the applicant, and additional information is provided within the Transportation Response Report prepared by Commute in Attachment H .

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			home buyers; families; retirees? They will all have cars even if they plan on using the public transport they will take up the car parks 24/7.	
2.2	Ruby Pearce	Construction Effects	Other concerns include the impact on the adjacent properties like [REDACTED]. Ruby is home all day, and the construction noise and impact on the environment for the children playing in the park in the Pukeroa Reserve is also concerning. What will the development do to dispel residents fears that they will be constantly hearing the construction noise, the dust and debris from the construction and the increased volume of traffic in the area and roads that are not designed for heavy construction vehicles? School children walking to and from school each day and playing in the park will notice the increase in activity and traffic, and hope that there will be some evening and night time restrictions on this work.	The construction effects have been addressed in the original application, noting a number of conditions and management plans have been proposed to ensure the effects from construction and earthworks activities are appropriately managed, in line with best practice.
2.3	Ruby Pearce	Wastewater / Stormwater	Ruby has lived in this home for 45 years, and has seen the farm and local area flood significantly approx 4 times in that period. The infrastructure required in a former swamp needs to ensure the old buried kauri trees in the kauri swamp and the soft peat earth that these homes will sit on is sufficient to support such a big development in the coming years. Please ensure that the sewerage and storm water is up to standard and even over spec'd to ensure it's ability to cope with our 1 in 10 year floods that currently impact the area.	Wastewater and stormwater matters have been outlined and addressed within previously submitted information by the applicant, and additional information is provided within the Response Reports prepared by Maven in Attachments N and R .
3.	Andrew and Sandra Beard – [REDACTED] (external neighbour)			
3.1	Andrew and Sandra Beard	General Opposition	We would like to express our opposition to the development as proposed for the following reasons: - The disestablishment of Hamlin Road (disconnecting our road from direct access to Takanini and the North. Isolating our street and properties with Sunfields to the west and Ardmore Airport to the east. - The impact on the water table and the effect on drainage to our property at the eastern end of the development. - A proposed flood / drainage area to be established directly behind our property, creating a water catchment area encouraging insects (mosquitoes) as well as vermin. - Due to the fast tracking of this development NZTA have incorporated the development into their plans for the Mill Road project, to accommodate the Sunfields development the Road will be built approximately 60 metres from the rear of our property.	These matters have been considered within the original application, this summary table and within the updated appendices, noting the disestablishment of Hamlin Road and the location of the proposed Mill Road corridor is part of the Notice of Requirement (NoR) process for Mill Road – Stage 2. Feedback is best to be provided through this separate NoR process as this is out of the Applicant's control. Additional information on flooding and drainage is provided within the Stormwater and Flooding Response Report prepared by Maven in Attachment N.
4.	Te Akitai Waiohau Settlement Trust (TAWST) and Te Akitai Waiohau Waka Taua Incorporated (TAWWTI)			
4.1	TAWST and TAWWTI	Cultural Importance to Te Akitai Waiohau	Page 1 and 2 – Te Akitai Waiohau operates incorporated societies that aim to promote and support kaitiakitanga as well as cultural and environmental values with regard to the wider needs of the community. These not-for-profit tribal organisations represent Te Akitai	The importance of the area to Te Akitai Waiohau is acknowledged.

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			Waiohua in matters relating to the environment, sustainable resource management, education and the protection of wāhi tapu as well as advocate and uphold Te Ākitai Waiohua cultural values and interests as Mana Whenua. Waiohua are the tangata whenua of this region who traversed their tribal domain (rohe) in a seasonal cycle of shared harvesting, gathering and fishing. This area is culturally significant because of the relationships and associations of the people of Te Ākitai Waiohua and their culture and traditions with their ancestral land and waters. Traditionally, the region was a natural swampland utilised by Te Ākitai Waiohua for resource collection and concealing items when attacked. It is possible that the area conceals hidden archaeological items of cultural significance.	
4.2	TAWST and TAWWTI	Engagement of the Fast Track Application	Page 2 – Te Ākitai Waiohua acknowledges the engagement that has occurred on the various applications and proposals associated with the Project, including the Cosgrave Plan Change, Awakeri Stages 2 and 3 resource consents, and the previous Sunfield Plan Change. While Winton acknowledged the Sunfield CVA via letter in April 2024, there has been no meaningful engagement with Te Ākitai Waiohua regarding the fast-track application. An update received in November 2024 indicated that engagement with Mana Whenua might not occur until the new year, further delaying meaningful involvement. This lack of consultation does not reflect an understanding or recognition by SDL of the cultural significance of Takaanini to Te Ākitai Waiohua. The fast-track application was initially lodged on 14 February 2025. There has been no genuine attempt to ensure that Te Ākitai Waiohua is fully briefed on the resource consents, including draft conditions.	The engagement undertaken with Te Akitai Waiohua is outlined and clarified within the memo provided by Navigator in Attachment V2 .
4.3	TAWST and TAWWTI	Cosgrave Plan Change CVA	Page 3 – TAWST do not approve of the applicant's approach of applying the Cosgrave Plan Change CVA recommendations to the wider Sunfield development. This is not acceptable or appropriate. The Cosgrave Plan Change CVA was prepared under a different planning framework, where urban development was anticipated under the Auckland Unitary Plan as Future Urban Zone and a plan change was being sought. The wider Sunfield development is outside the Rural Urban Boundary on rural zoned land affected by extensive flooding, and a full suite of resource consents is being sought for implementing the entire development.	The engagement undertaken with Te Akitai Waiohua is outlined and clarified within the memo provided by Navigator in Attachments V2 .
4.4	TAWST and TAWWTI	Scale and Duration	Page 3 – Te Ākitai Waiohua is concerned with the scale of the fast-track application and the level of detail that the Panel and those invited to comment are expected to review and comment on within the available timeframe. The suite of resource consents is significant in part because the operative zones (Mixed Rural and Future Urban) do not anticipate the proposed development. The Project is larger than Hobsonville, a greenfield area that has been progressively urbanised over a period of some 15 years and which is still under development. Since development	This comment is directed more at the intent and processes outlined within the Fast-Track Act, which is out of the control of the Applicant. The conditions, if approved, will effectively guide development within Sunfield. The resource consent will be staged over a 15-year period. In a general sense, the proposed conditions provide certainty of outcome but also allow for flexibility to ensure adjustments in technology, best practice and market demand can be taken into account.

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			commenced at Hobsonville, there have been adjustments to the original masterplan and changes to the speed of construction reflecting market conditions as would be expected over a long period of time. However, the guiding principles for development at Hobsonville are secured in the Auckland Unitary Plan through precinct provisions. There will be no such provisions in the Auckland Unitary Plan for the Sunfield Development. There are significant risks to approving the full suite of resource consents today for the full development over 15 years. It does not reflect changes that will occur in the planning system, adjustments to best practice, or shifts in market demand. Approving these resource consents locks development into what may be considered appropriate today but may not be appropriate or viable in 5 to 10 years' time. This is evident in the fact that Auckland Council is developing a plan change to manage development in natural hazards, amending the current approach in the Auckland Unitary Plan.	
4.5	TAWST and TAWWTI	Flood Risk	Page 4 - Te Ākitai Waiohū acknowledges the technical success of the Awakeri Wetlands for managing flooding effects. Elsewhere in the Project, stormwater runoff from a 350-hectare upstream catchment is diverted around the community and attenuated. The design proposes to attenuate a significant volume of water identifying that it will not increase flooding downstream or upstream. Auckland Council's memorandum dated 16 June 2025 raises significant concerns about the sufficiency of information on stormwater and flooding. There is not enough evidence to guarantee that the non-flooding outcomes can be achieved or to determine what the consequences of failure will be. For example, what will occur if culverts are blocked or the system is overwhelmed in extreme rainfall events beyond the 100-year event.	Flooding and stormwater matters have been outlined and addressed within previously submitted information by the applicant, and additional information is provided within the Stormwater and Flooding Response Report prepared by Maven in Attachments N .
4.6	TAWST and TAWWTI	Car-less Community	Pages 4 and 5 – Te Ākitai Waiohū supports aspirations for people to be less reliant on cars for their everyday needs. However, this is not necessarily a reality for all people. Many people must drive to work because there is no direct public transport route, and/or it doesn't operate when needed for shift work. The provision of employment within the Project is acknowledged, but these jobs may not be suitable for nearby residents. It is unclear how the limited carparking will be assigned to residents, but one can assume that it will cost more. While it could be considered that Sunfield will be attractive to those who choose the lifestyle and do not want to own a car, it should be recognised that not all people have choices. By relying on resource consents to approve the project, there is no guarantee that the outcomes will be maintained in the long term. New resource consents could be sought in the future to include additional roads and parking if early stages have been unsuccessful. The concept of car-less is therefore not considered a significant (or a significant enough) benefit.	Transportation matters, including the concept of a car-less community have been outlined and addressed within previously submitted information by the applicant, and additional information is provided within the Transportation Response Report prepared by Commute in Attachment H .

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4.7	TAWST and TAWWTI	Ecological Benefits	Page 5 – Te Ākitai Waiohua opposes the reclamation of streams within the Project site. The protection of freshwater and mauri of freshwater is a key priority for kaitiaki. For Te Ākitai Waiohua the wai is an inseparable part of our whakapapa and our identity, and is a fundamental part of what drives our very existence. The future health and wellbeing of our waters are a matter of utmost importance to Te Ākitai Waiohua and action is required to protect, restore and maintain the health and mauri of our waterways, stop further degradation and loss and reverse past damage. Genuine partnership in water governance and planning is sought to give effect to Te Ākitai Waiohua customary dominion (ownership) of freshwater within their rohe. Te Ākitai Waiohua have an intergenerational responsibility to future-proof this natural resource for coming generations. Te Ākitai Waiohua assert that the mauri of wai must be maintained as a resource management priority throughout their rohe, and that the traditional and contemporary relationship between Te Ākitai Waiohua and freshwater resources be maintained.	There are clear positive ecological effects associated with the proposal, which includes the protection and enhancement of the natural wetland and the retention of watercourse 2, the two features worthy of protection within Sunfield, along with the significant planting and landscaping associated with the proposal. It is also noted that a number of conditions and management plans are also proposed to ensure ecological effects are appropriately mitigated. Ecology matters have been outlined and addressed within previously submitted information by the applicant, and additional information is provided within the Ecological Assessment prepared by Bioresearches in Attachment I. An updated set of proposed conditions are contained within Attachments B.
4.8	TAWST and TAWWTI	Cultural Values	Page 5 – Te Ākitai Waiohua has not committed to participating in the Mana Whenua Consultative Group and seeks to engage with SDL on an individual basis to ensure our mana motuhake and recognition of our association with the whenua. There is no one Mana Whenua voice as every iwi has its own whakapapa and pūrakau, which may not be fully reflected in a collective arrangement between six iwi groups. The proposed Wai Mauri Stream Park is recognised as an opportunity to restore and enhance te taiao and protect the wai mauri. Te Ākitai Waiohua seeks ongoing engagement on the integration of cultural narratives into this landscape because of our strong association with Takaanini. Te Ākitai Waiohua request that the applicant fully develops Wai Mauri Stream Park, including the establishment of planting through at least 5-year monitoring, prior to vesting to Auckland Council. This project should be commenced immediately in terms of iwi engagement in design to ensure it is established prior to residential areas being occupied.	The importance of the area to Te Akitai Waiohua is acknowledged. Engagement with Mana Whenua is outlined and clarified within the memo provided by Navigator in Attachment V2 and an updated set of proposed conditions are contained within Attachment B.
4.9	TAWST and TAWWTI	Consent conditions	The draft conditions have been reviewed and specific comments provided in Attachment 1 to this letter. It is critical that the conditions incorporate opportunities for Te Ākitai Waiohua to exercise kaitiakitanga and mana motuhake within this significant area of our rohe. Te Ākitai Waiohua seeks the opportunity to work through the conditions with SDL to ensure the issues raised have been fully addressed.	The proposed amendments by TAWST and TAWWTI to the offered conditions have been considered accordingly and an updated set of proposed conditions are contained within Attachment B.

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5.	Te Akitai Waiohua Settlement Trust (TAWST) and Te Akitai Waiohua Waka Taua Incorporated (TAWWTI)			
5.1				
6.	Peter and Natalie Mackenzie – [REDACTED] (external neighbour)			
6.1	Peter and Natalie Mackenzie	Development and construction effects	Para 2 – Our Opposition We oppose this Application which will cause severe impacts on our home, land and Personal safety for both ourselves and any livestock we may possess during development and construction phases	The construction effects have been addressed in the original application, noting a number of conditions and management plans have been proposed to ensure the effects from construction and earthworks activities are appropriately managed, in line with best practice.
6.2	Peter and Natalie Mackenzie	Industrial Activity	Para 3 – We also oppose the plan to build an Industrial complex on our southern boundary. This will completely change our rural outlook. May we suggest that the industrial complex be built on Airfield Road frontage as there is better access to various road directions.	As outlined within the original application, it is considered that there is an appropriate buffer to the eastern properties with the open space network located in between. It is noted that the Mill Road Stage 2 Corridor is also now located along this boundary providing a greater setback. The Employment (industrial) Precinct has frontage and access onto Airfield Road.
6.3	Peter and Natalie Mackenzie	Flooding	Para 4 – Our property is a designated flood plain. So far this winter we have had 5 floods through our land, the most severe, causing deep, swift water flooding across Hamlin road and needing road monitoring to slow and caution drivers. This flood was also after dark, around midnight. The Mill Road end of Hamlin Road has had over the past few years, water-logged paddocks and drains so full that the water laps the edge of the tarseal most of the winter. There does not appear to be any attempt to rectify the drainage problem and the road which sits on peat, is likely to break up due to volumes of heavy traffic. Storm water and flooding solutions are paramount and need to be designed and tested before serious changes are made to the land surface especially if land reformation raises levels and prevents flood water escaping.	Flooding and stormwater matters have been outlined and addressed within previously submitted information by the applicant, and additional information is provided within the Stormwater and Flooding Response Report prepared by Maven in Attachment N .
6.4	Peter and Natalie Mackenzie	Dust	Para 4 – We stress the need to control all dust associated with earthworks. Our property is North of the Sunfield proposal, and therefore down wind of the prevailing Southern wind and South Westerlies. Peat dust is very fine in the summer time when dry and is a serious health hazard due to its acidity. Also as we are dependant on clean rain water gathered from roof-tops, for both our livestock and ourselves, this would create a further major health hazard. Peat Dust settling in our hay paddocks during summer would have a detrimental effect to the health of us all.	The construction effects have been addressed in the original application, noting a number of conditions and management plans have been proposed to ensure the effects from construction and earthworks activities are appropriately managed, in line with best practice.
6.5	Peter and Natalie Mackenzie	Construction Hours and Activities	Para 6 – We request that noise from machinery be restricted to “normal” work hours without weekends, Public Holidays, or during the hours of darkness, while being carried out. We are concerned that constant vibration from construction activities could cause brickwork on our house to crack and fail.	The construction effects have been addressed in the original application, noting a number of conditions and management plans have been proposed to ensure the effects from construction and earthworks activities are appropriately managed, in line with best practice.

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7.	Aaron Paap – no address given (external neighbour)			
7.1	Aaron Paap	Flooding	Reviewing the documentation provided as part of the fast track application, I appreciate the work that has taken place to evaluate the impacts this development may have on the surrounding and development areas. I do however have concerns of the site management plan and do not deem the ground and rain water management plans sufficient for an area that is flood prone. If not monitored and managed appropriately, there is an increased risk of flood damage to surrounding properties and their inhabitants.	Flooding and stormwater matters have been outlined and addressed within previously submitted information by the applicant, and additional information is provided within the Stormwater and Flooding Response Report prepared by Maven in Attachment N .
7.2	Aaron Paap	Noise	Furthermore, I note the assessment for noise management in the area for Ardmore airport but there are no plans to manage the noise levels for both the airport and surrounding residents. These are key examples of details lacking in the plan but may not necessarily include all missing details that may impact on the surrounding area.	As outlined within the original application, it is considered that there is an appropriate buffer to the eastern properties with the open space network located in between. It is noted that the Mill Road Stage 2 corridor is also now located along this boundary providing a greater setback, and potentially greater noise. Proposed conditions 14 to 17 will mitigate effects associated with construction noise.
8.	Minister for Seniors			
8.1	Minister for Seniors	Housing Provision for Older People	I am supportive of projects that increase the supply of housing, particularly housing options appropriate for older New Zealanders, and those that improve the provision of aged residential care facilities. I endorse older people being able to live independently and to 'age in place' for as long as possible. This is made possible by developments that consider their location within communities and that support access to home and community support services. Regarding the Sunfield Project, many of the features of the development do indeed reflect age friendly principles and actively support residents to 'age in place'. The proposed retirement village developments will contribute to the supply of housing for older people in the area, where there is a demand for retirement village living. The proposed village design is well appointed, located to be accessible to both local amenities and to transport to those further afield. It is pleasing to see the inclusion of universal access standards in this project, and I encourage these to be considered throughout the buildings and wider development.	These comments are noted.
9.	Jessica Swales – [REDACTED] (external neighbour)			
9.1	Jessica Swales	Access to Amenities	It's important that local residents like ourselves have ease of access into the development area, so we too can benefit from the new infrastructure and services.	These comments are noted, with the Mill Road Stage 2 corridor a matter to be considered through the NoR process as this is out of the Applicant's control.
9.2	Jessica Swales	Visual and Environmental Impact	We would appreciate a substantial green buffer or open space between our existing rural properties and the new development to help maintain our current views and reduce visual impact. The original Sunfield plans we have been aware of appeared to show a green space or setback between our boundary and the start of the development, which we supported if done right. However, under NZTA's latest Mill Road proposal, that area is now shown as a major arterial road, which would sit between our property and the development — a significant and less-than-ideal change. Also noting the more recent concept design for Sunfield also appears to come right up to our boundry which from previous plans did not appear to do so. A lot of the propsed 'open-spaces' appear to be designed for stormwater management which makes us question how useable for recreation these spaces will be and what negative impacts they will bring to our area - mosquitos, rats, smells etc.	As outlined within the original application, it is considered that there is an appropriate buffer to the eastern properties with the open space network located in between. It is noted that the NZTA proposed Mill Road Stage 2 Corridor is also now located along this boundary providing a greater setback. The effects of the location of the Mill Road – Stage 2 corridor are a matter to be considered through the NoR process as this is out of the Applicant's control.

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9.3	Jessica Swales	Construction Effects	We are concerned about the extent and duration of construction-related disruptions such as noise, dust, and heavy traffic near our homes and how these will be managed and monitored.	The construction effects have been addressed in the original application, noting a number of conditions have been proposed to ensure the short-term effects from construction and earthworks activities are appropriately managed, in line with standard practice.
9.4	Jessica Swales	Transport and Mill Road Implications	We are particularly concerned about the NZTA's recent Mill Road proposal, which poses a significant impact on our property and the surrounding area — including the proposed route that goes directly past our land. We would like to understand whether the Sunfield development has the potential to influence or support an alternative route that reduces this impact. It's important that the planning for Sunfield is integrated with broader transport decisions to avoid compounding negative effects on local residents. We also have concerns that the Sunfield car-lite idea will force car owners to park on surrounding streets like ours.	Whilst the Sunfield Fast-Track application predates the lodgement of the NZTA Mill Road – Stage 2 NoR, following lodgement of the NoR by NZTA an amended proposal has been developed which factors in the Mill Road – Stage 2 corridor. This has included input from NZTA regarding the layout of the Sunfield development, traffic impacts and an integrated stormwater solution. The amended proposal has been outlined within the section 55 Planning Response Report and Masterplan documents. The effects of the location of the Mill Road – Stage 2 corridor are a matter to be considered through the NoR process as this is out of the Applicant's control.
10.	Watercare			
10.1	Watercare	Alignment to Growth Strategies	Para 18 – Watercare's bulk infrastructure programme is planned, funded, and sequenced in line with the Auckland Plan 2050, the Auckland Council Development Strategy (previously the Future Urban Land Supply Strategy 2017 and more recently the FDS), the Auckland Council Growth Scenario (previously i11v6 and more recently AGS23v1) (AGS), and the AUP(OP). Para 19 – The Sunfield FTAA is predominantly located beyond the RUB, incorporating only a small area of FUZ land which is programmed for 2050+. Therefore, it is not anticipated for development by the AUP(OP), the FDS, or the AGS. Para 20 – Watercare plans for and supports areas of urban growth identified by the Council, which excludes rural zoned land, in accordance with our obligations.	Wastewater and water supply matters have been outlined and addressed within previously submitted information by the applicant, and additional information is provided within the Water Supply and Wastewater Response Report prepared by Maven in Attachment N .
10.2	Watercare	Alignment to Growth Strategies	Para 23 – 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 environmental impacts (e.g. from a wastewater perspective, increased frequency and volume of untreated wastewater overflows and from a water perspective, levels of water pressure below adequate levels of service for key purposes such as firefighting). Para 25 – Funding on its own does not ensure certainty of providing bulk infrastructure earlier than planned. Other matters such as resourcing, statutory approvals, and construction timeframes constrain the ability to bring forward bulk infrastructure ahead of the planned programme. Given the fundamental trade-offs involved, it is not always possible to reallocate or bring forward investment to these areas. Inevitably, to reallocate investment to a FUZ area ahead of schedule, other projects such as infrastructure for other growth areas, or renewals and upgrades required to ensure level of service and/or improved environmental outcomes would need to be deprioritised. Where connections are granted, infrastructure capacity may	Wastewater and water supply matters have been outlined and addressed within previously submitted information by the applicant, and additional information is provided within the Water Supply and Wastewater Response Report prepared by Maven in Attachment N .

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			be taken up faster than planned, resulting in constraints to growth in live zoned areas (i.e. areas with operative urban zoning). This would place Watercare in an unacceptable position.	
10.3	Watercare	Water Capacity (Bulk Supply Point – BSP)	Para 28 – Both the Airfield Road BSP and Porchester Road BSP identified by the Applicant are at full capacity and cannot accommodate new connections. Para 47a) – Maven states that “a detailed assessment be undertaken to confirm the actual available capacity within the existing Bulk Supply Points (BSPs) and to determine whether these BSPs can be upgraded to accommodate additional flows”. Watercare’s S67 memo and these comments confirm that the two BSPs proposed by the Applicant are currently operating at full capacity and cannot support additional development. Para 47b) – Maven states that access constraints are readily resolved through “Developer-funded interim BSPs or live-tap connections that do not require watermain shutdowns”. Live-tap solutions are not acceptable on strategic transmission infrastructure such as the Waikato-1 Watermain due to unacceptable risk of failure. Further all new BSPs on major transmission watermain must be accompanied by a new line valve to provide operational flexibility for these major assets. Installation of a line valve is not possible when installing a live-tap BSP.	Wastewater and water supply matters have been outlined and addressed within previously submitted information by the applicant, and additional information is provided within the Water Supply and Wastewater Response Report prepared by Maven in Attachment R .
10.4	Watercare	Water Capacity (Bulk Supply Network)	Para 29 – A preliminary assessment undertaken by Watercare indicates that there is sufficient capacity within the bulk water supply network to supply development of the 57 hectares of FUZ only without precluding development of existing live zoned land. However, the challenge at this location relates specifically to limitations in accessing the transmission capacity.	Wastewater and water supply matters have been outlined and addressed within previously submitted information by the applicant, and additional information is provided within the Water Supply and Wastewater Response Report prepared by Maven in Attachment R .
10.5	Watercare	Water Supply – Shutdown of Waikato-1 Watermain	Para 30 – 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 will not allow any further shutdowns of the Waikato-1 Watermain until the Waikato-2 Watermain is operational. Para 31 – An operational decision has since been made to defer all non-essential shutdowns for the Waikato-1 Watermain until the Waikato-2 Watermain is commissioned. Para 32 – The Waikato-2 Watermain is currently in the feasibility stage, with construction anticipated to commence in 2030 and commissioning by the end of 2034. However, there is uncertainty associated with this completion date as various project stages, such as concept design and securing of designations and resource consents, have not yet been completed.	Wastewater and water supply matters have been outlined and addressed within previously submitted information by the applicant, and additional information is provided within the Water Supply and Wastewater Response Report prepared by Maven in Attachment R .
10.6	Watercare	Infrastructure Funding	Para 33 – As such, while there is theoretically capacity to service the FUZ component of the Sunfield FTAA with potable water, that capacity cannot be realised without the completion of the Waikato-2 Watermain and developer funding of a new BSP from the new Waikato-2 Watermain connecting to the Sunfield FTAA. If the Application were to proceed on this basis, the cost of this infrastructure would need to be borne by the Applicant (in around 2034) and subject to an Infrastructure Funding Agreement with Watercare.	Wastewater and water supply matters have been outlined and addressed within previously submitted information by the applicant, and additional information is provided within the Water Supply and Wastewater Response Report prepared by Maven in Attachment R .

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			Para 44 – The scale and cost of infrastructure that would be required to be expedited by any infrastructure agreement to enable the Sunfield Project is anticipated to be substantial, and significantly more than the Applicant has identified. Given the scale, complexity and likely significant cost of the bulk infrastructure upgrades required to support development of the Site, an infrastructure funding agreement to support this Application is unlikely to be feasible or beneficial.	
10.7	Watercare	Wastewater Upgrades	Para 35 – 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. These upgrades are not planned or funded in Watercare’s 10 year AMP and would be dependent on the South-West Interceptor Duplication, which is a planned upgrade but is scheduled for delivery in the late 2030s.	Wastewater and water supply matters have been outlined and addressed within previously submitted information by the applicant, and additional information is provided within the Water Supply and Wastewater Response Report prepared by Maven in Attachment R .
10.8	Watercare	Wastewater – Low Pressure Sewer (LPS)	Para 36 – Watercare considers the Applicant’s proposed LPS to manage the significant wastewater load to be unacceptable. Watercare’s Code of Practice (COP) stipulates that servicing should predominantly rely on a gravity network unless specific conditions apply. The COP on page 56 under C5.3.12.3.1 states: <i>“A low pressure sewer system should in general be considered as limited for up to 50 dwelling units due to system risk to customer service under power failure. A combination of systems or a gravity system with pump station may be more practical.”</i> Para 37 – The proposed development includes 3,854 dwellings, plus industrial, commercial, and school connections. This far exceeds the recommended LPS threshold and introduces significant operational risk. The documentation provided by the Applicant lacks adequate justification for the proposed use of an LPS over a gravity solution. Moreover, it appears unlikely that an LPS would sufficiently reduce flow from the site to negate the need for upgrading the downstream infrastructure. The LPS system is therefore highly unlikely to be accepted for vesting by Watercare. Para 46a) – Maven states that <i>“The Applicant proposes the implementation of a Low Pressure Sewer (LPS) system, a proven and Watercare-accepted solution particularly well-suited to the Site’s flat topography, high water table, and low-strength peat soils.”</i> The Council’s section 67 memo dated 16 June 2025 (prepared with input from Watercare) and these comments are clear that an LPS at the scale proposed is unacceptable, as per Watercare’s CoP. Furthermore, the Applicant has also failed to provide adequate justification as to why a gravity sewer system or on-site (private) servicing is not feasible.	Wastewater and water supply matters have been outlined and addressed within previously submitted information by the applicant, and additional information is provided within the Water Supply and Wastewater Response Report prepared by Maven in Attachment R .
10.9	Watercare	Wastewater Treatment Plant (WWTP)	Para 38 – A further constraint on wastewater servicing is wastewater treatment capacity. The ability for the Mangere Wastewater Treatment Plant (WWTP) to service out of sequence and unanticipated growth is constrained by the existing resource consent which includes as a condition an average daily flow limit. The existing resource consent expires in 2032. Watercare will need to reconsult the discharge, which will need to provide for future growth	Wastewater and water supply matters have been outlined and addressed within previously submitted information by the applicant, and additional information is provided within the Water Supply and Wastewater Response Report prepared by Maven in Attachment R .

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			in line with Council's growth forecast. This process will also confirm the discharge location and effluent quality which will inform any future upgrades. There are no upgrades, outside those planned for treating flows from the Central Interceptor, anticipated between now and the end of the existing consent. A new discharge consent will determine future scale and timing of wastewater upgrades. Additional unanticipated wastewater flows as described in this PPC may require upgrades to be brought forward, which would need to be done in accordance with the existing and future discharge consent. Para 46b) Maven's assumption that the downstream wastewater treatment plant (WWTP) can accommodate approximately 4,000 additional DUEs is unsubstantiated. Watercare has not provided any advice regarding headworks requirements. Notably, Watercare is currently revising the Mangere WWTP catchment model, which only accounts for planned and existing urban development.	
10.10	Watercare	Veolia Correspondence	Para 45 – The correspondence from Veolia dated 12 April 2024 and attached to the July Maven Memo does not represent official Watercare advice. In addition, it concerns a separate matter—the withdrawn Private Plan Change (PPC) for 55 Cosgrove Road—and is not relevant to the current Application, particularly in relation to the 187 hectares of rural zoned land.	Wastewater and water supply matters have been outlined and addressed within previously submitted information by the applicant, and additional information is provided within the Water Supply and Wastewater Response Report prepared by Maven in Attachment R .
10.11	Watercare	Private Servicing Solutions	Para 52 – Given that connections to the public wastewater and water supply networks will not be available for the FUZ land at the earliest until the late 2030s – and even then, remain uncertain due to the planning and funding status of the required projects and reliance on Applicant-funded bulk wastewater upgrades – and because the 187 hectares of rural land will not be able to be provided with connections, Watercare may refuse any requests for water supply and wastewater connections for the proposal. The Applicant will therefore need to demonstrate clear, technically robust, and sustainable permanent private servicing solutions for both potable water and wastewater. The Application should not be approved on an assumption of public capacity being available.	The applicant is not considering a private servicing solution for the proposed Sunfield development.
10.12	Watercare	Consent Conditions	Para 54 – If the Application is granted notwithstanding Watercare's opposition, Watercare recommends the decision includes conditions requiring a permanent private water supply and wastewater servicing solution and that the current conditions relating to public servicing are removed. Amendments to the Proposed Conditions are annexed to these comments and made without prejudice to further comments which may be made if the Panel decides to circulate draft conditions for comment. Watercare emphasises that it will not accept any private infrastructure / assets for vesting.	The applicant is not considering a private servicing solution for the proposed Sunfield development. Note that an updated set of proposed conditions are contained within Attachment B .
11.	Rosanne Wills - [REDACTED] (external neighbour)			
11.1	Rosanne Wills	Traffic	Traffic issues would be exacerbated in neighbouring streets like Old Wairoa Road. Already in the more recent subdivisions (I live in one) there are vehicle movement issues especially when cars are parked on either side of the road. There remains room for only one vehicle to move through. Drivers today don't know how to navigate a situation like this. Developers are being allowed to plan roads in new subdivisions with a minimal road width which I offer is not	Transportation matters, including parking matters and the concept of a car-less community have been outlined and addressed within previously submitted information by the applicant, and additional information is provided within the Transportation Response Report prepared by Commute in Attachment H .

Comment No.	Comment From	Theme	Comments	Applicant Response
			sufficient. This is happening in many subdivision around Auckland today, I offer very poor planning. How do emergency vehicles navigate this situation? 'Car-less' living - this proposed development is approximately three plus kilometres from my address (513 Old Wairoa Road) to the Papakura Train/Bus station. This development would be ideal if located beside the Auckland rail system. My concern is most Auckland properties have multiple vehicles which get parked on the road, as garages today are being used for many other uses than parking a vehicle, e.g home gym, cooking, storage. What is the proposed transport to this development? (sorry I haven't researched) The development is advertised as a 'self-contained suburb' will this mean that everyone with a vehicle will park within the development? I suggest it's not a totally self-contained suburb, this is an inaccurate description, what about a hospital, a cemetery, churches, tertiary education to name a few?	
11.2	Rosanne Wills	Mill Road	Commenting on Mill road - the establishment of the whole of the Mill Road corridor remains uncompleted. Without the new Mill Road being established I suggest what Winton Land Limited is proposing aligns with poor infrastructure planning and a significant detriment to existing residents.	Whilst the Sunfield Fast-Track application predates the lodgement of the NZTA proposed Mill Road – Stage 2 NoR, following lodgement of the NoR by NZTA an amended proposal has been developed which factors in the Mill Road – Stage 2 corridor. This has included input from NZTA regarding the layout of the Sunfield development, traffic impacts and an integrated stormwater solution. The amended proposal has been outlined within the section 55 Planning Response Report and Masterplan documents. The effects of the location of the Mill Road – Stage 2 corridor are a matter to be considered through the NoR process, and this is out of the Applicant's control.
11.3	Rosanne Wills	Wastewater and Water Capacity	Wastewater and water capacity - under Veolia I read 'Veolia has reviewed the wastewater approach proposed by Maven Associates for the Sunfield development and, subject to confirmation of adequate capacity from Watercare.' Has Watercare advised there is the capacity?	Wastewater and water supply matters have been outlined and addressed within previously submitted information by the applicant, and additional information is provided within the Water Supply and Wastewater Response Report prepared by Maven in Attachment R.
12.	Minister of Education			
12.1	Minister of Education	Education Activities	The Ministry of Education is aware of the proposed Sunfield development and advises me that a new primary school will be required to accommodate the additional demand as there will be insufficient capacity in the current school network. While the proposed development has an identified site for a new school, as the site is approximately 350m from an existing state school it is not considered an appropriate location and the Ministry of Education would not develop a new school on the site currently proposed. The Ministry of Education is open to having a discussion with the Applicant regarding alternatives within the development. I note that the provision of any new school to serve the catchment area will be based on the Ministry's network analysis, standard site evaluation methodology and will be subject to future prioritisation and budget approval processes.	The Applicant acknowledges the confirmation from the Ministry of Education ('MoE'), through the comments received in relation to the Sunfield development Substantive Application, that there is insufficient capacity in the current school network to cater for the projected increased school demand as a result of the Sunfield development and that additional primary provision would be required if the development proceeded as intended. The Applicant and MoE have met to discuss the comments provided by the MoE, during which: - the Applicant outlined why it believes that the proposed location for the school is the logical location within the Sunfield development, based on the characteristic of the site (specifically relating to the noise contours associated with Ardmore Airport); - MoE advised that: - there is no statutory requirement for a new school to be located more than 350 meters from an existing state school;

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				– the MoE acknowledged that school site location within residential developments typically presented benefits when compared to locations outside of these developments but would be required to administer its own assessment of site suitability – the proposed location for the school within the Sunfield development, being in close proximity to the existing Kauri Flats school which caters for year 0 to 8 and a preschool, presents an opportunity to consider different models including split campuses (subject to consultation); and – if a new school was constructed within the Sunfield development then consideration could be given to include provision for specialist learning requirements due to demand and forecast capacity limitations in the local network. Both parties have agreed to continue their ongoing relationship in relation to the provision of a school site within the Sunfield development.
12.2	Minister of Education	Conditions Construction Management	– To manage effects on the nearby schools the following amendment is requested to proposed condition 21: <i>21. The CTMP must include specific details relating to avoiding, remedying or mitigating adverse effects on the environment from demolition, earthworks, construction and management of all works associated with this development, and setting out procedures to be followed which ensure compliance with the conditions of consent, as follows:</i> <i>...I. Identification of haulage routes with Council and Auckland Transport prior to commencement of works, including any specific non-working or non-movement hours to manage vehicular and pedestrian traffic near educational facilities, particularly during peak pick up and drop off times.</i>	The conditions have been updated to reflect this proposal.
13.	John Cheng - 119 Cosgrave Road (neighbour within Sunfield)			
13.1	John Cheng	General	We have owned and operated from this site for nearly 30 years and are generally supportive of initiatives that bring long-term benefits to the local area—such as increased housing supply, infrastructure improvements, employment creation, and a more sustainable model for urban growth. At the same time, we are mindful of our property's proximity to this particular development and the potential implications arising from future staging, design integration, and interface treatments.	Noted
13.2	John Cheng	Interface Opportunities	Our property lies directly within one of the planned residential precincts, adjacent to the key corridor of Cosgrave Road. Assuming the project proceeds, we are interested in how the interface between existing properties and the development will be handled—particularly in relation to: • Future road or laneway connections • Visual buffers or boundary planting • Pedestrian or greenway linkages	The masterplan has recognised the landowners in the central area of Sunfield may not want to develop their landholdings in line with the current masterplan, therefore the masterplan accommodates both a developed and non-developed outcome for the central area. Proposed individual property boundaries, proposed roads and laneways as well as pedestrian links all align or are commensurate with existing property title boundaries. Refer updated Masterplan and Engineering Drawings in Attachments C1 and E

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			Access to essential services such as power, water, and wastewater during and after construction Each of these elements could significantly impact both our current use and any future plans for the site.	
13.3	John Cheng	Stormwater and Ground Conditions	As a neighbouring property, we seek assurance that stormwater and drainage from the development will be managed to avoid downstream flooding or adverse impacts on subsurface stability. While our land has not previously experienced flooding (beyond minor pooling in low paddocks during cyclone Gabrielle), we consider it important that any ground disturbance or dewatering activity is carefully planned and monitored to avoid unintended consequences beyond the development boundary.	Flooding and stormwater matters have been outlined and addressed within previously submitted information by the applicant, and additional information is provided within the Stormwater and Flooding Response Report prepared by Maven in Attachment N. A number of conditions have been put forward (38-71) regarding geotechnical and groundwater monitoring.
13.4	John Cheng	Construction Effects	We anticipate that construction and infrastructure works may increase activity in the area. We would appreciate being kept informed of staging timelines—particularly for early works occurring near our property. In particular, we are interested in: - Any rezoning request and decisions that may affect our property - The scope and duration of any earthworks - Expected noise and visual impacts - Traffic disruptions or changes in access to our property - Any mitigation or rectification measures being proposed	The proposed fast-track application provides information on the scope and parameters of the proposal. In line with standard practice, the requirements of the Construction Noise Management Plan and Construction Traffic Management Plan require acknowledgement and provision for addressing effects on neighbouring properties.
13.5	John Cheng	On-Going Engagement	As a neighbouring landowner, we are open to ongoing engagement with the panel and project team. We also wish to highlight that the scale and long-term nature of this project means that development may unfold over many years. This inevitably creates a degree of uncertainty for landowners like us who sit adjacent to the site but outside current ownership. Regular communication and clarity around staging, infrastructure timing, and future intentions would help provide more certainty and support constructive engagement as the process advances.	Noted. The Applicant is committed to continuing ongoing stakeholder engagement for the Sunfield development.
14.	Xian Zhang - 279 Airfield Road (external neighbour)			
14.1	Xian Zhang	Stormwater	After reviewing the Sunfield development files, we had some understanding about development, especially the neighbor property (279 Airfield Rd) is planned for employment zone. We want to know how the development might impact on the current flooding/stormwater in the area. We are doing market gardening, this is important to the current activity. At the same time, we want to know the possibility of Sunfield to include the property as part of their development.	Flooding and stormwater matters have been outlined and addressed within previously submitted information by the applicant, and additional information is provided within the Stormwater and Flooding Response Report prepared by Maven in Attachment N.
15.	MC Investments (NZ) Limited - 119A Cosgrave Road (neighbour within Sunfield)			
15.1	MC Investments (NZ) Limited	General Support	We own the property located at 119A Cosgrave Road through our company, MC Investments (NZ) Ltd.	Noted.

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			Our property is 1 of the 8 privately owned properties within the proposed Sunfield Development. In Wintons Substantive Application these 8 properties are known as Super Lots 23, 24 and 25. We are supportive of Winton's vision for the Sunfield proposal, which will be a great asset for the area. Our dealings with Simon Ash have been excellent and Winton has been accommodating with our requests to date. This included discussions around the ultimate layout of the Masterplan, and how it affected our property.	
15.2	MC Investments (NZ) Limited	Staging	Bullet Point 1 – Winton have stated in the Substantive application the Land they don't own will be developed last as proposed for Super Lots 23, 24 and 25 (out of 25 Super Lots) . These properties are within the middle of the Sunfield proposal, where it would be unreasonable for the current Landowners to be surrounded by a construction zone for 10 years. If the Fast-Track application is successful our preference would be to work with Winton earlier than 10 years.	These aspirations are noted, recognising that the proposed staging plan does have flexibility in terms of sequencing and the ability to undertake stages concurrently.
15.3	MC Investments (NZ) Limited	Stormwater	Bullet Point 2 – The stormwater from our home roof and paddocks feed into the southern open drain which borders Winton's Super Lot 2. Our understanding is this open drain will be removed/filled in for Super Lot 2. What would happen to our stormwater once development commences for Super Lot 2. Bullet Point 5 – The Sunfield Development area is on a 100 year flood plain. In our 17 years here, flooding has never been an issue. During Cyclone Gabrielle parts of Clevedon and Drury flooded, but we saw no flooding in the proposed Sunfield Area apart from a small low lying area down towards the corner of Mill and Hamlin Roads. Paddocks do flood down closer to the Papakura Stream but these are well outside the proposed Sunfield area.	The stormwater catchment for all of the area within the Sunfield development and the upstream catchment will be managed through the implementation of a pipe network, open channels, flow paths and swale drains. Flooding and stormwater matters have been outlined and addressed within previously submitted information by the applicant, and additional information is provided within the Stormwater and Flooding Response Report prepared by Maven in Attachment N.
15.4	MC Investments (NZ) Limited	Stormwater	Bullet Point 3 – Construction for the 57 hectares zoned as Future Urban Zone (FUZ) for Super Lots 1, 2 and 3 cannot commence until the Awakeri Stormwater channel is extended under Cosgrave Road. What is the traffic proposal for Cosgrave Road during the construction of the culvert for the extension of the Awakeri Wetland? The 2 options from around 10 years ago, were a temporary road in the paddocks on the eastern side of Cosgrave Road or full closure of Cosgrave Road for a significant period of time (est. 3 to 6 months). Cosgrave Road traffic volume has significantly grown in that time and is now a major South Auckland corridor – clarity of the traffic solution will be of high interest to those that use the road on a regular basis.	The regulatory approvals for Stage 2 and 3 of the Awakeri Wetland (underneath Cosgrave Road) have been granted. A Traffic Management Plan is required which proposes a full road closure for the duration of the Stage 2 culvert construction project. It is acknowledged that the respective Construction Traffic Management Plans will need to be aligned as staging progresses.
15.5	MC Investments (NZ) Limited	Proximity to Ardmore Airport	Bullet Point 4 – We have read a lot of negative comments in the media and online re the proximity of the proposed Sunfield development to Ardmore Airport. We have lived here for 17 years and enjoy watching the Planes and Helicopters. It's always a treat to see and hear the Harvard's. A lot of people who live in the area actually like seeing and hearing Aircraft especially on Warbird days. There is a very simple answer to those that may be concerned with Aircraft noise – don't buy in the area. There are plenty of other areas in Auckland to buy a home.	These comments are noted, and it is agreed that prospective purchases have the opportunity to make personal choices.

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15.6	MC Investments (NZ) Limited	Mill Road	Bullet Point 6 – After many years of the Mill Road Corridor being a political football, NZTA have now finally given clarity on Stage 1 and 2 routes. With the investment in this alternative road into Auckland, it only makes sense to use the nearby land to improve housing supply and employment opportunities in South Auckland.	The amended proposal has been outlined within the section 55 Planning Response Report and Masterplan documents.
16.	897 Alpha Limited - [REDACTED] (external neighbour)			
16.1	897 Alpha Limited	General Support	Para 3 – 897 Alpha’s position is that the wider Papakura / Takanini Area to the east existing Takanini urban area, (including both the Sunfield Site and the 897 Alpha Property) is suitable for urban development. Accordingly, 897 Alpha is generally supportive of the urbanisation of the area, including the Sunfield Site.	Noted.
16.2	897 Alpha Limited	Fast Track Process	Para 4 - However, 897 Alpha considers that before such urbanisation occurs the area should go through a structure planning process and plan change processes in the usual way. Plan change processes to rezone land to FUZ and relocate the RUB would provide an opportunity to identify how environmental constraints (particularly in relation to stormwater, traffic) and the timing and delivery of infrastructure will be addressed. Para 5 – The resource management system uses a system of temporal and spatial hierarchies to co-ordinate urbanisation across the region and avoid ad-hoc development. This sequential process is well known, and is initiated by structure or master planning, followed by plan changes to settle zoning and determine where and how infrastructure will be delivered, and then resource consent applications once this wider framework is settled. The framework for urbanisation in the Takanini / Papakura area has not been settled. Para 6 – The Application is for a comprehensive, large scale and intense, urban development in the MRZ outside of the RUB in advance of wider strategic and urban integration issues for the Takanini / Papakura area being resolved. Significant infrastructure upgrades are required to service the wider Takanini / Papakura area and mitigate the adverse effects of development and these are presently unplanned or unfunded. Para 7 – 897 Alpha considers that if the Sunfield Site is to be developed as proposed by the Applicant then the best planning and environmental outcomes would be achieved by the RUB being relocated to the North -South Leg of Hamlin Road (which would create a defensible boundary) and the land between MRZ land within this boundary rezoned to FUZ to enable comprehensive structure planning to be carried out and infrastructure holistically and appropriately planned for. Para 8 – 897 Alpha acknowledges that this is not something that can be achieved through the Application because it seeks only resource consents rather than the plan change that would be required to relocate the RUB or change the zoning.	This comment is directed more at the intent and processes outlined within the Fast-Track Act, which is out of the control of the Applicant. A fast-track application process is a legal and legitimate way to consent development. The proposed servicing of Sunfield has been addressed both by the three waters strategy report and the integrated traffic assessment as part of the originally submitted application.

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			Para 9 – 897 Alpha therefore considers an equivalent of a structure planning and plan change process needs to be achieved through this Fast-track process and conditions on the consents sought, to ensure that the Application will not result in significant adverse effects on the environment and potentially foreclose on, or limit, future urban development opportunities in the wider area. Such an ad-hoc outcome would fail to properly deliver the regional economic benefits that are fundamental to purpose of the FTAA.	
16.3	897 Alpha Limited	Legislative Framework	Para 18 (to 56) – While the Panel will need to comprehensively consider the legislative framework under the new Fast-track Act, the key framework issues relevant to 897 Alpha's comments are: (a) The extent to which the Panel may set conditions on the Application to address the wider strategic planning and urban development issues raised by Application. (b) Whether the Panel may decline the Application (i.e. to allow those wider issues to be addressed through other planning processes).	The legislative framework is addressed within the memorandum of Bronwyn Carruthers KC.
16.4	897 Alpha Limited	Development Integration and Planning	Schedule One – Development Integration	The comments provided within Schedule One relate to two main matters being the Takanini Structure Plan and the proposed NZTA Mill Road – Stage 2. In respect to these matters the following points are made: - The Takanini Structure Plan is a document that was created under the legacy Papakura District Plan. This District Plan is no longer in use and has been superseded by the Auckland Council Unitary Plan: Operative in Part, meaning the Takanini Structure Plan is no longer of relevance. - Whilst the Sunfield Fast-Track application predates the lodgement of the proposed NZTA Mill Road – Stage 2 NoR, following lodgement of the NoR by NZTA an amended proposal has been developed which factors in the Mill Road – Stage 2 corridor. This has included input from NZTA regarding the layout of the Sunfield development, traffic impacts and an integrated stormwater solution. The amended proposal has been outlined within the section 55 Planning Response Report and Masterplan documents. The effects of the location of the Mill Road – Stage 2 corridor are a matter to be considered through the NoR process as this is out of The Applicant's control.
16.5	897 Alpha Limited	Stormwater and Flooding	Schedule Two – Flooding and Stormwater	Flooding and stormwater matters have been outlined and addressed within previously submitted information by the applicant, and additional information is provided within the Stormwater and Flooding Response Report prepared by Maven in Attachment N .
16.6	897 Alpha Limited	Transportation	Schedule Three - Transportation	Transportation matters have been outlined and addressed within previously submitted information by the applicant, and additional information is provided within the Transportation Response Report prepared by Commute in Attachment H .
17.	Auckland Council			
17.1	Auckland Council	Funding and Financing	Annexure 1: Funding and Financing	Please refer to the section 55 Planning Response Report, and referenced attachments.
17.2	Auckland Council	Economics	Annexure 2: Economics	Please refer to the Economic Review Response Report prepared by Property Economics within Attachment G .

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17.3	Auckland Council	Stormwater and Flooding	Annexure 3: Healthy Waters and Flood Resilience Memo	Flooding and stormwater matters have been outlined and addressed within previously submitted information by the applicant, and additional information is provided within the Stormwater and Flooding Response Report prepared by Maven in Attachment N .
17.4	Auckland Council	Stormwater Discharge	Annexure 4: Stormwater (Regional Discharge Permit)	Flooding and stormwater matters have been outlined and addressed within previously submitted information by the applicant, and additional information is provided within the Stormwater and Flooding Response Report prepared by Maven in Attachment N .
17.5	Auckland Council	Wastewater and Water Supply	Annexure 5: Watercare Services Limited	Wastewater and water supply matters have been outlined and addressed within previously submitted information by the applicant, and additional information is provided within the Water Supply and Wastewater Response Report prepared by Maven in Attachment R .
17.6	Auckland Council	Wastewater and Water Supply	Annexure 6: Veolia Letter	Wastewater and water supply matters have been outlined and addressed within previously submitted information by the applicant, and additional information is provided within the Water Supply and Wastewater Response Report prepared by Maven in Attachment R .
17.7	Auckland Council	Transportation	Annexure 7: Auckland Transport	Transportation matters have been outlined and addressed within previously submitted information by the applicant, and additional information is provided within the Transportation Response Report prepared by Commute in Attachment H .
17.8	Auckland Council	Transportation	Annexure 8: Transport (Auckland Council)	Transportation matters have been outlined and addressed within previously submitted information by the applicant, and additional information is provided within the Transportation Response Report prepared by Commute in Attachment H .
17.9	Auckland Council	Parks and Open Space	Annexure 9: Parks Planning	Please refer to additional information in Attachment C , particularly C4 .
17.10	Auckland Council	Development Engineering	Annexure 10: Development Engineering	Please refer to the section 55 Planning Response Report, and referenced attachments.
17.11	Auckland Council	Contamination	Annexure 11: Land Contamination	Please refer to the section 55 Planning Response Report.
17.12	Auckland Council	Earthworks	Annexure 12: Regional Earthworks	An Earthworks Response Report prepared by Maven is contained in Attachment U .
17.13	Auckland Council	Ecology	Annexure 13: Ecology and Streamworks	Ecology matters have been outlined and addressed within previously submitted information by the applicant, and additional information is provided within the Ecological Assessment prepared by Bioresarches in Attachment I .
17.14	Auckland Council	Groundwater	Annexure 14: Groundwater	Groundwater has been addressed within the LDE geotechnical report within Attachment L and in turn reviewed by Earthtech within Attachment M .
17.15	Auckland Council	Lighting	Annexure 15: Lighting	No further comment – minor update to relevant proposed condition of consent.
17.16	Auckland Council	Productive Land	Annexure 16: Highly Productive Land	Productive Land and Land Use Capability have been addressed within the memorandum from Landsystems (Attachment S) and the NPS-HPL Assessment prepared by AgFirst (Attachment T)
17.17	Auckland Council	Productive Land	Annexure 17: Soil and Land Use Capacity	Productive Land and Land Use Capability have been addressed within the memorandum from Landsystems (Attachment S) and the NPS-HPL Assessment prepared by AgFirst (Attachment T)
17.18	Auckland Council	Urban Design	Annexure 18: Urban Design	Please refer to additional information in Attachment C , particularly C4 .
17.19	Auckland Council	Landscape / Visual	Annexure 19: Sally Peake	No specific response considered to be required, with general commentary within the section 55 Planning Response Report.
17.20	Auckland Council	Noise and Vibration	Annexure 20: Noise and Vibration	Acoustic impacts have been addressed within the Noise Response Report prepared by the Styles Group contained in Attachment K .
17.21	Auckland Council	Waste Management	Annexure 21: Waste Planning	No specific response considered to be required, with general commentary within the section 55 Planning Response Report.

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17.22	Auckland Council	Air Quality	Annexure 22: Air Quality	No specific response considered to be required, with general commentary within the section 55 Planning Response Report.
17.23	Auckland Council	General	Annexure 23: Papakura Local Board	No specific response considered to be required, with general commentary within the section 55 Planning Response Report.
17.24	Auckland Council	General	Annexure 24: Franklin Local Board	No specific response considered to be required, with general commentary within the section 55 Planning Response Report.
17.25	Auckland Council	Legal	Sunfield – Auckland Council Family Legal Memorandum	The legislative framework and legal considerations are addressed within the memorandum of Bronwyn Carruthers KC.
17.26	Auckland Council	Planning	Strategic and Planning Memo	The planning considerations are addressed in the document entitled 'Applicant Section 55 Planning Response Report – Sunfield Substantive Application – FTAA-2503-1039.
18.	Rimu Family Trust - [REDACTED] (external neighbour)			
18.1	Rimu Family Trust	Mill Road	1. Approximately how much of the land at [REDACTED] is proposed to be acquired for the new road? 2. Our client requests that a gate allowing vehicle access be installed on one side of the new road, along with an assigned street number and a suitable fence. 3. Due to the construction of the new road and the Sunfield development, our client requests that [REDACTED] be connected to and benefit from the new road and Sunfield's reticulated water supply and drainage system.	Queries 1 and 2 relate to the proposed NZTA Mill Road – Stage 2 corridor. These queries are best addressed through the NoR process for Mill Road – Stage 2 as this is out of the Applicant's control. As to query 3, the Applicant does not propose to connect this property to the Sunfield's reticulated water supply and drainage system contemplated by the application.
19.	Auckland Transport			
19.1	Auckland Transport	Future Development Strategy	Para 6 – Council's FDS, excludes the majority of this land from the strategy, with the exception of the southwestern corner. As such the majority of this land is not considered developable, at least for the duration of the strategy, which is up to 2050+. The FDS notes that both New Zealand Transport Agency Waka Kotahi's (NZTA) Mill Road and a Frequent Transit Network (FTN) are required before the development can proceed on this land. Similarly, it is also considered that the site should not be developed without the required transport upgrades in place. At a high level, these include: a) The NZTA Mill Road Project, adjacent to the site (as per Figure 2 below), and its previous stages to the north towards Redoubt Road. b) Active modes related infrastructure that connects the site to Clevedon Road, Walters Road, and both the Takanini and Papakura rail stations. c) A Frequent Transit Network operating in close proximity to the site. d) Capacity upgrades at key intersections throughout the wider area, including those along Great South Road. Refer to Figure 2 below for the locations of these intersections. e) Significant stormwater works to ensure no adverse flooding effects on the site and on adjacent neighbourhoods.	The FDS has been assessed within the original application, particularly the Substantive Application Planning Report section 9.2. It is noted that only Mill Road and the Takaanini Frequent Transit Network are the infrastructure prerequisites highlighted in the FDS needed for future urban growth in the Takaanini area.

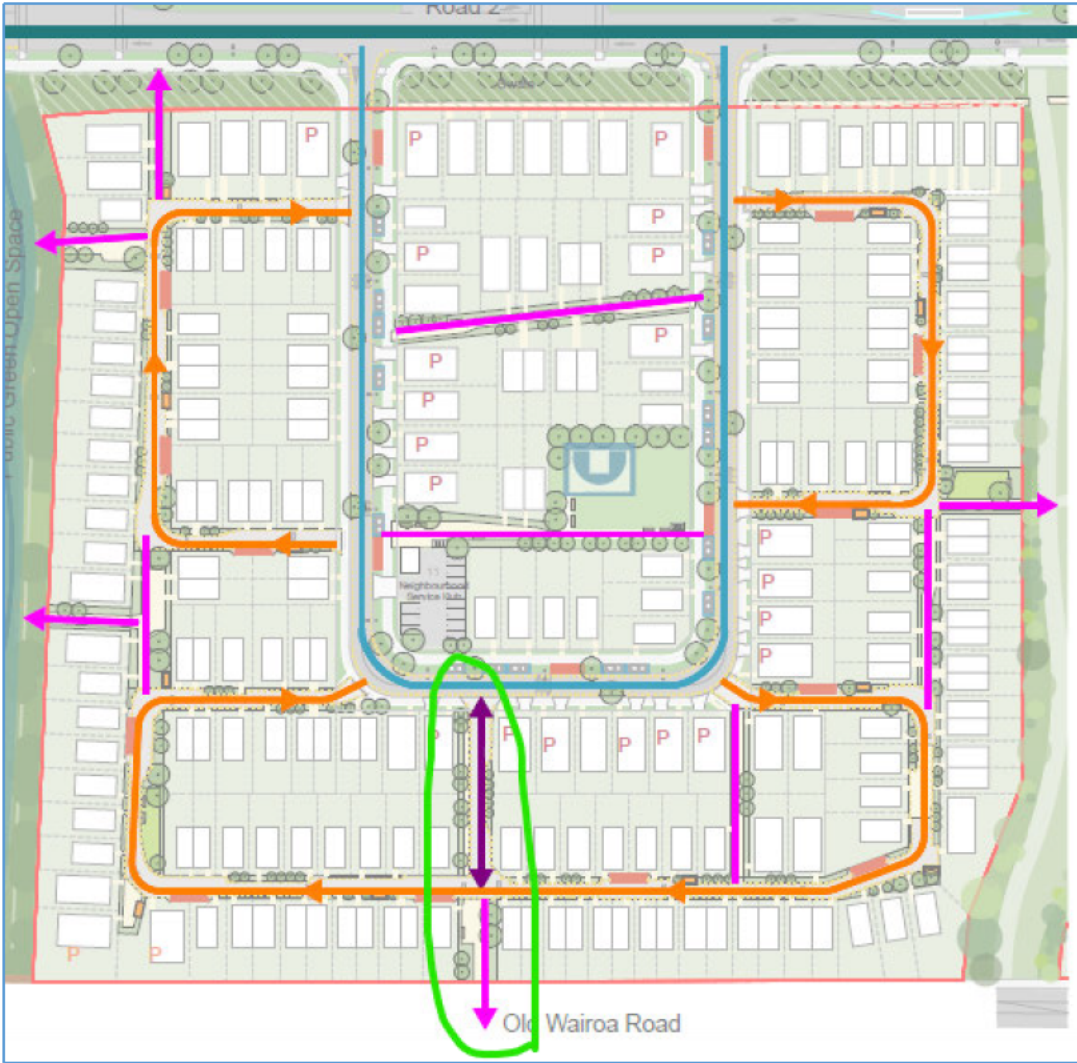
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			Para 7 – There is a concern that enabling development in an area earmarked for development more than 25 years in the future could potentially undermine planning and investments already underway for development areas with nearer-term development horizons.	
19.2	Auckland Transport	Adverse Impacts v National and Regional Benefits	Para 9 – It is considered that the proposed development would result in significant adverse impacts that are disproportionate to its benefits (regional or otherwise) and cannot be adequately avoided, remedied, mitigated, offset, or compensated through conditions or modifications. Independent modelling by Beca and modelling collaboration between Beca and the Auckland Forecasting Centre confirms that if more realistic trip generation rates eventuate, significant additional intersection upgrades will be required beyond those proposed by the applicant, with some requiring land acquisition outside current road reserves. Therefore, under section 85(3) of the Fast-track Approvals Act 2024 (FTAA), the Panel should consider declining consent. The Applicant has overstated the regional benefits, and development ahead of supporting infrastructure is likely to lead to poor transport outcomes both in this area and in other areas where development is expected but might be delayed if this proposal proceeds. Key adverse impacts include reduced productivity and efficiency of the surrounding road network, especially the Cosgrave Road – Mill Road corridor and associated intersections, as well as key linkages along Great South Road leading to the Takanini rail station, the Papakura rail station, and the State Highway 1 interchange. This productivity reduction will affect both freight and commercial vehicles as well	Notwithstanding that it is considered that the adverse transportation effects can be appropriately mitigated, assessing the adverse impacts and their proportion to the national and regional benefits is wider than transportation matters. This has been addressed within the section 55 Planning Response Report.
19.3	Auckland Transport	Trip Generation	Para 10, Bullet Point 1 – The underlying assumptions, specifically the trip generation rate relied on in the Commute transport assessment, are considered aspirational and unlikely to eventuate. The result is the applicant underestimating the infrastructure required to support this proposal, specifically active modes and intersection upgrades. Although the applicant proposes some intersection upgrades, AT expects significant future congestion on existing roads and intersections that do not anticipate future traffic from this development. For more information, please refer to Annexure 1 – Beca report.	These matters have been addressed within previously submitted information by the applicant, and within the additional information contained within the Transportation Response Report prepared by Commute attached as Attachment H .
19.4	Auckland Transport	Private Public Transport	Para 10, Bullet Point 2 – Concerns with the operation of a large, privately funded public transport service that is required to ensure the feasibility of the proposal. Concerns with the ability of the existing public transport service to cater to the demand of the proposal before a frequent service is in place.	The Applicant, is a 100% subsidiary of Winton Land Limited. Winton Land Limited is a NZX and ASX listed developer of significant financial capability. Winton will engage an established public transport operator and fund the purchase, operation and maintenance of a fleet of Sunbuses as required to cater for demand at Sunfield. The Applicant is dedicated to the provision of the Sunbus as evidenced by the dedicated bus lane incorporated into the design for the development. 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. The infrastructure i.e. a bus lane will be in place in perpetuity and therefore this allows for contingency or supplementary measures to be implemented such as public transport/buses.

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19.5	Auckland Transport	Stormwater	Para 10, Bullet Point 3 – Major gaps in the stormwater and flooding assessment provided by the applicant. AT’s concern is road safety and asset damage, flooding effects both within the site and on adjacent neighbourhoods.	Flooding and stormwater matters have been outlined and addressed within previously submitted information by the applicant, and additional information is provided within the Stormwater and Flooding Response Report prepared by Maven in Attachment N .
19.6	Auckland Transport	Detailed Design	Para 10, Bullet Point 4 – Detailed engineering design issues that must be addressed as part of the Fast Track application in order to avoid significant future delays and potential required amendments to the application. More details on these are provided in the Progressive Transport Solutions report included as Annexure 2 .	These matters have been addressed within previously submitted information by the applicant, and within the additional information contained within the Transportation Response Report prepared by Commute attached as Attachment H .
19.7	Auckland Transport	Mill Road – Stage 2 and Amended Proposal	Para 10, Bullet Point 5 – The transport assessment has not been updated since the applicant acknowledged the proposed alignment of NZTA’s Mill Road Stage 2.	Whilst the Sunfield Fast-Track application predates the lodgement of the proposed NZTA Mill Road – Stage 2 NoR, following lodgement of the NoR by NZTA an amended proposal has been developed which factors in the Mill Road – Stage 2 corridor. This has included input from NZTA regarding the layout of the Sunfield development, traffic impacts and an integrated stormwater solution. The amended proposal has been outlined within the section 55 Planning Response Report and Masterplan documents.
19.8	Auckland Transport	Adequacy of Transportation Assessment	Para 11 – In the absence of a proper plan change process to address zoning, land use, and infrastructure services, it is expected that the development should address larger cumulative issues and effects resulting from the development. In this case, however, the proposal has not addressed major concerns in relation to the provision of appropriate infrastructure. Recommendations are made in the main body of this report for further assessment and modelling by the Applicant. The applicant’s s67 response dated 17 July 2025, provides brief responses to AT’s queries but does not provide additional assessment, including with regard to the matters noted in point 10 above. This response does not address the majority of AT’s concerns, and no changes are proposed to the application.	These matters have been addressed within previously submitted information by the applicant, and within the additional information contained within the Transportation Response Report prepared by Commute attached as Attachment H .
19.9	Auckland Transport	Mill Road – Stage 2 and Amended Proposal	Para 16 – The s67 response dated 17 July 2025 acknowledges that the application’s Transport Assessment needs to be updated with regard to Mill Road Stage 2’s layout. However, the s67 response (dated a month after the NoR lodgement) has not provided any updates on the matter. The effect of Mill Road Stage 2 on the proposal from a transport perspective remains unclear, especially on the following matters: Trip generation and internalisation due to the loss of sections of the employment precinct. Stormwater (specifically flooding) matters due to the loss of sections earmarked for stormwater purposes in the original proposal.	See comment 19.7 which recognises that the Sunfield Fast-track application predates the lodged NoR, and an amended proposal has been put forward.
19.10	Auckland Transport	Private Public Transport – Provision of Service	Para 22 – The Commute s67 response, section 1.10, indicates that the proposed bus service will be provided by a Winton subsidiary company Sunfield Development Limited (SDL), and then transferred to an incorporated society. No date for this transfer is provided and it is uncertain how the requirements of this service will transfer from SDL to the incorporated society. Para 23 – The Tattico s67 response, section 2.4.4 indicates that the bus service will be provided by Winton and managed by the applicant ‘SDL’. It is understood through the	See response to comment 19.4. The Applicant proposes to engage an established public transport operator (Kinetic, Go Bus, Ritchies etc) to manage the automated bus service.

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			applicant's Planning Report that Winton is the applicant and not SDL. An incorporated society is not mentioned in this s67 response. Para 24 – Proposed condition 114 indicates that the consent holder will be responsible for providing the bus service. This condition does not reference the incorporated society as noted in the Commute s67 response. Para 25 – There is concern with the informal manner in which such a significant public transport undertaking is proposed. Operating a public transport service requires specialised expertise and ongoing regulatory compliance. Concerns are raised that this undertaking is underestimated and not well considered by the applicant. Para 26 – Additionally, the Council may not be able to effectively monitor compliance or take enforcement action without a clear identification of the responsible party for each aspect of the service. Condition 114 does not provide any measures that must be undertaken by the applicant should the service not function at an acceptable standard. Para 27 – Any public transport service will require the relevant approvals under the Land Transport Management Act from the public transport service provider (currently AT) and will need to comply with the NZTA Requirements for Urban Buses (2024). Any service provided will need to be provided and maintained to AT's requirements/standards which includes a high level of bus punctuality and reliability as well as penalties for the operator for failure to reach certain metrics. Para 28 – It is recommended that the applicant provide concise information on the provision of public transport from one source that specifically indicates who will provide the service, when they will provide the service, to what standard of performance the service needs to operate (including what penalties will apply if this standard is not achieve) and how AT can have confidence that the service will be provided when required and function as intended. It is further recommended that Condition 114 be redrafted as a clear and enforceable condition or conditions (e.g., so that a particular stage of development cannot proceed until the service is established and operational). Contingency also needs to be added to the condition in the case of service disruptions.	
19.11	Auckland Transport	Private Public Transport – Timing of Service	Para 29 – The Commute transport assessment, at section 14, and condition 123 indicate that the service will be provided at 890 dwellings constructed (445 occupied), which is noted as the conclusion of stage 3. By contrast, the offered Condition 114 indicates that the service will be provided "as part of stage 4". Para 30 – It is considered that, to ensure the service is provided at the right time, the trigger should relate to a specific dwelling number and recommends that the occupation of dwelling	Condition 123 has been reviewed to ensure an appropriate trigger for when the Sunbus service or alternative Public Transport service will be provided which factors in staging, ease of monitoring / implementation, and mitigating adverse effects. It is therefore proposed to implement the service at the conclusion of 890 dwellings being constructed. Proposed condition 114d) outlines that a roll-out plan for the Sunbus EV Fleet or alternative in line with the Staging Plan for the project is required. This is anticipated to capture the level of service required for each respective stage of development.

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			445 be the trigger point for the requirement of this service to be functional as opposed to a stage. Para 31 – The information provided on this service does not indicate what level of service is required during various stages of the development. As currently presented, the full 44 bus service at a headway of 400m seems to be proposed for more than 890 (445 occupied) dwellings.	
19.12	Auckland Transport	Private Public Transport – Rail Station Integration	The Takanini and Papakura Rail stations’ capacity to accommodate additional bus services needs to be investigated. AT has not been consulted in this regard and notes that both these stations will have bus capacity issues in the peak hours. This matter must be discussed with AT, and the requirements for this investigation and the required upgrades must be secured through conditions.	Condition 114 has been updated to require the Public Transport (Sunbus) Operational and Implementation Plan to include details of the termination points at Takanini and Papakura rail stations.
19.13	Auckland Transport	Public Transport for Stages 1, 2 and 3	Para 35 – The Commute s67 response, at item 1.8, notes that the residents of the development, prior to 890 dwellings being constructed (445 occupied), will make use of the existing public transport. The response also mentioned AT’s planned service #364. It is acknowledged that this service is planned to be provided in 2026 and will be able to cater to some of the public transport demand from the site. However, this service can only serve dwellings in close proximity to the southwestern portion of the site and will require these residents to walk 650m–900m. This distance is considered on the cusp of an acceptable walkable catchment and will not encourage significant uptake in public transport for the residents of this site. The Commute s67 response notes that the first stages of the proposal are within this southwestern portion of the site. It is recommended that this be included as a condition of consent, i.e., that Stages 1, 2, and 3 must be completed before the occupation or use of any further stages. Para 36 – It remains unclear how residents of the initial 890 dwellings will travel, particularly if the development aspires to "car-less" living, given the initial lack of public transport and potentially inadequate walking and cycling facilities. Consequently, private vehicle trip rates are likely to be higher during initial development stages, making the applicant's aspiration of a 60%7 public transport mode share is unachievable for a long period of time.	Condition 1A outlines that the consent holder may stage the subdivision in any order. This condition has been amended to provide greater clarity, as have the transportation staging conditions (123 and 176) to provide greater certainty and to align with constructed dwelling numbers within the Sunfield development. Provision will be made for additional carparking in the first stages of the development to allow for private vehicle ownership ahead of the public transport option becoming available. The active modes network external upgrades will be implemented with the first stages, and the internal network will also be implemented with each new stage. Please refer to additional information in the Transportation Response Report prepared by Commute in Attachment H.
19.14	Auckland Transport	Active Modes	It is noted that the roading plans provided are large files, extensive that do not specifically focus on active modes to the extent expected for such a significant proposal. A dedicated active modes plan showing proposed upgrades on the periphery of the site and on the existing transport network is recommended. This plan should provide certainty on what exactly is proposed where and should ensure that the required upgrades are captured for delivery in subsequent stages.	The Engineering Plans provide this information, along with the Open Space Strategy Report, and Masterplan documentation which also provide information on the active mode connections. Proposed conditions 31, 163, and 165 in particular require detailed design to be provided prior to implementation. An Active Mode Plan has been prepared and is contained within Attachment C10.
19.15	Auckland Transport	Active Modes – Internal connections	Para 41 – Road to road vested active modes connections internal to the site do not seem to be provided. The application drawings seem to indicate certain locations where these are	Recognising that the proposal as lodged, and subsequently amended, is what needs to be assessed, it is considered that the proposal provides a well-connected development, with internal connections provided throughout Sunfield,

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			possible, but these are not labelled. Figure 4 below shows in red the locations where it is considered that vested road to road accessways should be provided as part of the road network. This is considered a requirement of any large subdivision application, especially since the proposal has significantly reduced reliance on general vehicle travel. The proposal, as presented, does not indicate an efficiently connected neighbourhood, rather isolated residential blocks that do not allow for a connected and efficient layout of street patterns (legally). Para 42 – In this regard 8m wide road to road accessways (as per AT’s design standards) is recommended. The recommended road to road accessway locations are provided in the red lines on Figure 4 below. The connections offer significantly reduced travel time around the neighbourhood and key destinations. The yellow lines in Figure 4 below indicate where these connections could be beneficial, where the applicant can investigate providing a connection through an accessway or easement. Para 43 – The missing link in the ‘Sunfield loop’ significantly detracts from achieving a connected development.	as illustrated within the Engineering Plans, Scheme Plans, Masterplan, and Precinct Plans, and outlined within the submitted application documentation. It appears that many of the connections recommended by Auckland Transport are proposed, however in order to provide further clarity, updated Neighbourhood Plans have been provided, with an example below for Neighbourhood 3. <u>AT Recommendations</u> 

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				Residential Precinct Plan 
19.16	Auckland Transport	Active Modes – External Upgrades	Para 45 – AT considers that the following active modes upgrades referenced in the below paragraphs need to be provided by the applicant. Para 46 – The transport assessment notes that the Takanini Train Station needs to be upgraded for sheltered bike storage. The draft conditions proposed by the applicant do not include this as a requirement, and the designs provided also do not seem to address this required upgrade as well. The transport assessment should identify the bike storage location and design (minimum number of bikes to be accommodated within the facility) and include its implementation as a condition. Para 47 – It is unclear to what extent the applicant proposes to upgrade the site’s frontage in terms of active mode upgrades. The applicant plans show limited sections of frontage upgrades – generally where the red dashed lines are presented in Figure 5 below. However, with the site not being earmarked for development, it is required that this site provide	Additional information on active mode provisioning is provided in the Transportation Response Report prepared by Commute in Attachment H, and as illustrated on the Active Mode Plan within Attachment C10.

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			upgrades along the entire site 'block' to connect the site to the surrounding network, as this is required but unlikely to be provided by any other parties. Para 48 – It is difficult to ascertain exactly what forms these upgrades should take. However, when attempting to link the development into the surrounding site, the following are recommended as a minimum: • Shared path on Airfield Road (3m wide minimum) • Separated cycling and walking facilities or shared path on Mill Road and Cosgrave Road. • Separated cycling and walking facilities on Old Wairoa Road is preferred and will need to link in with the proposed path on Okawa Avenue and the existing on-street cycleway in Old Wairoa Road north of PA karaka Drive. Para 49 – With regard to connecting the site to the wider road network from an active modes perspective, as mentioned above, the statement that the proposal attempts to align with AT's cycling strategy for the area is considered less relevant. Transport strategies for this area does not take into account that this (unanticipated) development will occur. Figure 6 below (Commute transport assessment figure 7-2) shows the proposed active modes links (dark orange dashed lines) provided by the applicant. In this regard, AT considers the following: a) The active modes links on Pakaraka Drive and Cosgrave Road are acceptable and considered to assist in integrating with the neighbourhoods to the south and west. Connecting to the Papakura Rail station is preferred, but extensive and not required. b) No active mode links are provided on the northern side of the site. It is assumed that this is the case due to the lack of existing infrastructure on that end of the site. However, as mentioned throughout this document, the lack of infrastructure is expected in this area as this site is not earmarked for development in Council's FDS. As such, the applicant should provide the infrastructure that would have been in place by the time this site becomes developable. c) Based on the above, it is required the applicant to ensure active mode connectivity between their site and Takanini Train Station. This must be provided to assist in the reduction of private vehicle reliance for the residential and employment precincts. d) The recommended upgrades include active modes facilities on Airfield Road (south side), along the site boundary up to the northwestern boundary of 139 Airfield Road, where this facility will link into existing facilities. e) The recommended upgrades also include active modes facilities on Mill Road, between Airfield Road and Walters Road.	
19.17	Auckland Transport	Parking Ratios	Para 51 – The proposal includes a parking ratio of approximately two spaces for every dwelling (one for residents and one for visitors) to align with the intention of creating a low vehicle trip generation development. The Commute transport assessment at section 12.2 identifies the potential for illegal parking and proposes three ways to mitigate this, see below: a) Design internal roads so that berm parking is impossible.	To clarify, the proposal includes an overall average parking ratio of 1 car-parking space for every 10 dwellings, and 1 visitor space for every 10 dwellings, as per proposed conditions 110 and 111.

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			b) Residential parking scheme to be implemented by Council. c) Imposing covenants on homeowners/residents that restrict private car ownership. However, the Tattico s67 section 2.3.2 (other) indicates that points b and c above as per Commute’s transport assessment are <i>not</i> proposed. The s67 response notes that design solutions include internal (body corporate) and external (Public Road) parking restrictions.	
19.20	Auckland Transport	Illegal Parking	Para 52 – Although it is noted that roads can be designed to prevent berm parking, it is expected that this will result in a significant increase in enforcement requirements from AT, at the general ratepayers’ expense. This is especially the case since typical and relatively wide berms of one or both sides of the proposed roads are provided. Measures to avoid berm parking are identified in the Commute Transport Assessment – sections 12.2 and 12.3 – including bollards, fences, planting, and parking restrictions. The Commute s67 response at item 1.4 expands this list by adding “design led restrictive” pavements and notes that this parking restriction will be enforced by the incorporated society that is formed for each individual Joint Owned Access Lot. None of the provided measures are detailed or indicated on the roading drawings in the application, nor secured via the draft conditions, and therefore considered not to be effective. Para 53 – The applicant also acknowledges that spill-over parking will likely occur in the adjacent neighbourhoods. The Commute transport assessment at section 12.2 notes that Council can look to implement residential parking restrictions. In this regard, AT considers that the applicant must mitigate the effects associated with spillover and not rely on Council or AT to do so. Furthermore, residential parking zones were largely discontinued in 2007 by the legacy Auckland Council. These zones were intended for areas adjacent to the city and locations that did not allow on-site car parking, such as heritage buildings. They are not intended for new greenfield developments, and it is unlikely that AT or the local residents of surrounding communities will agree to support such a proposal. If this development is reliant on restricting parking in other neighbourhoods, it is considered that the residents of these affected neighbourhoods are parties adversely affected by this proposal. It is not supported that a development mitigates its effects by creating adverse effects on other adjacent sites. Para 54 – Covenants were initially suggested by the Commute transport assessment but subsequently dismissed by the Tattico s67 response in section 2.3.1. Para 55 – It is considered that with the current draft conditions devoid of specific and restrictive car parking controls that can be enforced by AT, there is a high likelihood of uncontrolled parking creating safety and amenity effects on internal and nearby external roads. Furthermore, it is considered that the extent of parking restrictions required is unrealistic and would require substantial parking restriction infrastructure, operational expenditure (by AT) and commitment by private entities (individual incorporated societies) and monitoring review by the applicant and Council. It is not considered that the proposal	Please refer to additional information in the Transportation Response Report prepared by Commute in Attachment H .

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			could achieve the envisaged 1 car per 11.5 dwellings, regardless of the measure proposed by the applicant.	
19.21	Auckland Transport	Vehicle Trip Generation and Modelling	Para 56 – The transport assessment is predicated on an unprecedentedly low level of vehicle trip generation. It is considered (and both Beca and Progressive Transport Solutions have reached the same conclusion) that the trip generation assumptions provided in the Commute Transport Assessment – Section 9.1 to be aspirational and highly unlikely. AT has commissioned Beca to undertake a review of the application’s trip generation assumptions and subsequently investigate more realistic trip generation assumptions that are possible with robust mitigation and consent conditions. Please refer to Annexure 3 for this report. To summarise this Beca report, the lowest that the expected trip generation rate could be is approximately 3,000 peak hour trips. This figure is still considered less than half of what industry trip generation standards would suggest but is still significantly higher than the Commute rate of 1,100 peak hour vehicle trips. Para 57 – As noted above, applicant’s transport assessment is based on a single aspirational trip generation rate. The applicant has not accounted for or assessed any other potential future scenario should their given trip generation rate not eventuate. Based on the unprecedented low trip generation rate it is consider likely that future scenarios other than suggested in the transport assessment will likely occur. It is recommended that the applicant investigate these other potential scenarios, assess them in a systematic fashion and provide mitigation measures according to these scenarios to ensure that whatever trip generation scenario eventuates, its effects on the transport network is mitigated. Para 58 – In the absence of the applicant providing any assessments on alternative future scenarios, AT and the Auckland Forecasting Centre have undertaken a SATURN network related transport model to obtain some insight into what the effects on the wider transport network could be if a more realistic trip generation rate eventuates. This network model is based on the year 2041 And a 3000 peak hour vehicle trips trip generation rate identified by Beca - see Annexure 3. The Beca report in Annexure 1 assesses the findings of this network model and has subsequently undertaken individual intersection Sidra modelling for certain intersections to further understand the effects and infrastructure requirements of this development. Please refer to Annexure 1 for this report. Para 59 – In summary, the report highlights eight intersections significantly affected by the proposal. Five of these have not been assessed by the applicant but it is likely that these will require upgrades and must be investigate by the applicant, these five are summarised as: • Ranfurly Road / Alfriston Road, • Walters Road / Porchester Road – This intersection is likely to see significant performance issue regardless of what future trip generation scenario eventuates and would likely need to be signalised by the applicant,	These matters have been addressed within previously submitted information by the applicant, and within the additional information contained within the Transportation Response Report prepared by Commute attached as Attachment H. It is noted that a modelling memorandum is contained within the Transportation Response Report. Conditions (123 and 123A) have been amended and added to address the monitoring of trip generation and the potential for future intersection upgrades.

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			• Porchester Road / Kuaka Drive, • Mill Road / Popes Road – Beca has undertaken Sidra modelling of this intersection and additional lanes to the roundabout will likely be required, • Mill Road / Alfriston Road - Beca has undertaken Sidra modelling of this intersection based on the increase in traveling times shown by the SATURN model, additional lanes to the roundabout will likely be required. Three of the eight have been assessed by the applicant but have been identified in the Beca report as likely requiring further upgrades, these three as summarised as: • Mill Road / Airfield Road - Beca has undertaken Sidra modelling of this intersection indicates that it will likely require an additional western lane and widened intersection footprint (land), • Waters Road, Cosgrave Road - Beca has undertaken Sidra modelling of this intersection indicates that it will likely require an additional western lane and widened intersection footprint (land), • Old Wairoa Road / Pakaraka Drive - Beca has undertaken Sidra modelling of this intersection, and it is likely that a roundabout will be the required upgrade at this intersection. In addition to Beca’ finding it is recommended that the applicant investigate the feasibility of shifting this access to the Okawa Avenue intersection as the gradients, on-street parking, and direct connection to the Okawa Avenue/ Clevedon Road to-be-signalised intersection is better.	
19.22	Auckland Transport	Road Safety	Para 62 – The transport assessment identifies a relatively high record of crashes on the external road network, including serious and fatal crashes over the last five years (Section 4.6). There are limited recommended safety upgrades to address this issue. Trips from the development may be accessing an unsafe road environment and increasing the risk of crashes occurring on a similar trend in the future. The transport assessment should include recommendations to address safety deficiencies. Para 63 – The recommendation to provide traffic calming on Old Wairoa Road to lower speeds and improve cyclist safety (Section 7.1.2) has not been carried through into the implementation plan or draft conditions. Para 64 – A Safe Systems Assessment approach to road and intersection design is recommended. This will require the applicant to undertake Safe Systems Audits for all intersection upgrades, except when exempt by AT. It is recommended that the requirement for Stage 3 Safe Systems Audits is provided for in the conditions.	These matters have been addressed within previously submitted information by the applicant, and within the additional information contained within the Transportation Response Report prepared by Commute attached as Attachment H .
19.23	Auckland Transport	Road Design – Airfield Road / Mill Road, and Pakaraka Drive / Old Wairoa Road	Para 65 – Note* The Airfield Road / Mill Road intersection is included as a roundabout in the engineering drawings. It is understood that the applicant proposes to signalise this, and comments (this document and Annexure 1) are provided on the basis of signalisation.	This matter has been addressed within previously submitted information by the applicant, and within the additional information contained within the Transportation Response Report prepared by Commute attached as Attachment H . It is noted that a modelling memorandum is contained within the Transportation Response Report. Conditions

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			Para 67 – The Beca report (Annexure 1) indicates that two intersections proposed to be upgraded by the applicant will require additional land to ensure feasible upgrades. This includes the Airfield Road/ Mill Road signalisation, where more land is required on all approaches, specifically the eastern leg. The second intersection is the proposed signalisation of the Pakaraka Drive/ Old Wairoa Road intersection with proposed Road 1. This intersection is recommended to be a roundabout. Additionally, it is unclear why the Okawa Avenue/ Old Wairoa Road intersection is not used as an access point instead of Pakaraka Drive. Okawa Avenue provides a more level gradient and has no existing kerbside parking. It will also link in directly with the to be (future) signalised intersection with Clevedon Road. It is recommended that conferencing occur between AT's experts and the applicant's road designers to ensure that the consent allows for feasible solutions to be progressed at design stages. Para 69 – As per the Active Modes comments, significant concerns are raised regarding the ability of the proposed upgrades to allow sufficient land for active modes facilities and berms. For example, the Airfield Road/ Mill Road intersection will require more land (on all approaches) to cater for walking, cycling and berm requirements. AT is unlikely to accept intersections at design and traffic resolution stages that do not sufficiently cater for all modes of transport.	(123 and 123A) have been amended and added to address the monitoring of trip generation and the potential for future intersection upgrades.
19.24	Auckland Transport	Road Design – Okawa Avenue / Clevedon Road	Para 70 – AT is in the process of signalising the Okawa Avenue/ Clevedon Road intersection. This upgrade does not take into account the proposal and will not be able to cater for the additional traffic following the development. It is strongly recommended that the applicant engages with AT in this regard and looks to provide AT with certainty that this intersection will be upgraded within a certain timeframe. If this is not done, AT will likely upgrade the intersection, causing significant delays to the areas and then in a few years, the applicant will need to redo the upgrade at significant cost and more delays to the residents.	This matter has been addressed within previously submitted information by the applicant, and within the additional information contained within the Transportation Response Report prepared by Commute attached as Attachment H . It is noted that a modelling memorandum is contained within the Transportation Response Report. Conditions (123 and 123A) have been amended and added to address the monitoring of trip generation and the potential for future intersection upgrades.
19.25	Auckland Transport	Travel Demand Management	Para 73 – The Commute Transport Assessment at section 11.5 notes that a travel plan (Travel Demand Management Plan – TDMP) would be beneficial for the employment district within the site. The Commute s67 response at item 1.25 reiterates this. Although AT agrees, it is recommended that a wider TDMP be provided that includes each precinct proposed and not only the employment precinct. A TDMP will ensure that ongoing transport and mode choice education and advice are provided to all residents, school children and workers within the Sunfield development. Para 74 – AT requested that a draft TDMP be provided to AT for comments. The Commute s67 response at item 1.25 responds by saying that it can be done. However, a draft has not been received. It is recommended that the applicant provides TDMPs for all precincts and that the following be incorporated into the consent conditions, if the application is approved: Condition 193 offered by the applicant notes the establishment of an Incorporated Society or equivalent to own and manage community assets. AT recommends that this Incorporated Society is also a forum through which travel demand	This matter has been addressed within previously submitted information by the applicant, and within the additional information contained within the Transportation Response Report prepared by Commute attached as Attachment H , noting an amendment to condition 130 is proposed.

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			management initiatives across the area are coordinated and delivered. If there is an annual charge for residents, commercial tenants, etc., a portion of this charge could be ring-fenced to delivering sustainable travel initiatives and events. The annual charge could go towards paying for a travel management coordinator, for example. AT recommends that Condition 193 be expanded so that the Incorporated Society must contribute towards travel demand initiatives to reduce private vehicle travel. - Individual workplaces, schools, and retirement villages should develop their own travel plans, which are focused on managing travel demand from deliveries, visitors, etc. - Residential TDMP can support/incentivise local trip making, especially for new neighbourhoods such as this proposal, which is the ideal point for creating new behaviours and travel habits. - Providing welcome packs to new residents that include information about transport options and incentives for new residents to set up the right travel behaviours from the beginning will be key. For example, AT HOP cards with credit for new residents, free trials for different transport modes such as scooters, bikes or carshares. - Many people's travel decisions are based on household commitments. This will be a new way of living – the Commute Transport Assessment at section 3 provides context that this development is the first development of its kind – therefore, a large-scale, residential personal travel planning programme should be investigated. - Measures to ensure that plan remains effective. I.e., how will the plan be reviewed and monitored, especially if higher vehicle usage is identified.	
19.26	Auckland Transport	Construction Traffic – Pavement Assessment	Para 75 – Construction traffic effects have not been assessed in terms of potential impacts on the pavement condition of existing roads that will carry earthwork and construction related to heavy vehicles. Para 76 – The applicant proposes 30,000m³ of net fill of earthworks to be imported to the site and an additional 100,000m³ of imported fill based on preloading one superlot at a time. Assuming a standard truck load of 12m³, this requires approximately 11,000 truckloads of earthworks to be imported into the site across the 10+ years of construction. This excludes construction vehicle traffic, which does not seem to have an estimate in the application. Para 77 – Roads likely to be affected include Airfield Road, Walters Road, Old Wairoa Road and Clevedon Road. The roads in the vicinity of the site, especially adjacent to the site, have not been provided with the expectation that this site will be developed and have not necessarily been built to withstand a significant number of heavy vehicles. Superficial and structural damage is likely to occur on the road network based on the construction and earthwork traffic of this development. This matter has not been assessed in this application. Video surveys and Falling Weight Deflectometer tests are recommended prior to, during and	The Applicant is not proposing to have exclusive use of any public road and therefore any wear on public roads cannot possibly be fairly attributed to one party recognising past and current development in the area. It is widely accepted that the roads surrounding the Sunfield site are high-capacity roads and therefore have a large number of existing roads users.

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			post development to ascertain the damage caused by the construction and earthworks traffic of the proposal. These damages should then be rectified by the consent holder within a reasonable timeframe, depending on their severity or must be mitigated through a financial contribution appropriate to the damages to the road controlling authority. Para 78 – A pavement Impact Assessment (PIA) and subsequent reinstatement by the applicant are recommended as a consent condition to address these matters, if the application is approved. Reference is made to a previously approved Covid fast track development, "Upland Road Retirement Village". This approval includes the condition that pavement damage for a certain stretch of road due to earthworks and construction traffic must be surveyed and repaired by the applicant.	
19.27	Auckland Transport	Stormwater	Para 79 – Significant sections of the site are situated within a 1 in 100-year Flood Plain. Please refer to Figure 9 below, which shows the extent of the flood plan as per the Auckland Council GeoMaps. This indicates significant risk to all new roads proposed within the site as well as to existing roads downstream of the site. It is considered that the applicant has not demonstrated that adverse flooding issues will not occur on any new and existing roads and recommend that conferencing with the applicant, Healthy Waters and AT occur on this matter to ensure a safe roading environment and fit for purpose stormwater infrastructure is provided. Para 81 – It is understood that the Applicant's flood modelling was recently provided to Healthy Waters. However, as Andrew Chin notes in his memorandum for Healthy Waters, there has been insufficient time for Healthy Waters to conduct a detailed review of this flood modelling. The Healthy Waters memo also notes that the proposed corridor of the Mill Road NoR intersects the eastern portion of the Sunfield development site, overlapping a critical area of the proposed stormwater system intended to capture and convey flows from eastern catchments northward to the Papakura Stream. Mr Chin notes that this overlap necessitates a fundamental reconsideration of Sunfield's stormwater management approach.	Flooding and stormwater matters have been outlined and addressed within previously submitted information by the applicant, and additional information is provided within Attachment N. Whilst the Sunfield Fast-Track application predates the lodgement of the proposed NZTA Mill Road – Stage 2 NoR, following lodgement of the NoR by NZTA an amended proposal has been developed which factors in the Mill Road – Stage 2 corridor. This has included input from NZTA regarding the layout of the Sunfield development, traffic impacts and an integrated stormwater solution. The amended proposal has been outlined within the section 55 Planning Response Report and Masterplan documents.
19.28	Auckland Transport	Transportation - Monitoring and Review	Para 82 – The Commute transport assessment at section 11.6 suggests the monitoring of initial stages of the development to ensure the measures proposed have the desired result (reduce external and internal private vehicle travel). The report also notes that this "monitoring should measure the travel modes of residents / workers including a continuous traffic count of the external links to the wider roading network to ensure private car travel is minimised as planned." Para 83 – The provided conditions do not include a specific condition in this regard. Para 83 – It is recommended that a robust condition or conditions be imposed requiring measures to address deviations from the required level of vehicle trip generation rate.	This matter has been addressed within previously submitted information by the applicant, and within the additional information contained within the Transportation Response Report prepared by Commute attached as Attachment H. It is noted that a modelling memorandum is contained within the Transportation Response Report. Conditions (123 and 123A) have been amended and added to address the monitoring of trip generation and the potential for future intersection upgrades.

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19.29	Auckland Transport	Proposed Consent Conditions	Para 100 – Should the application be further considered by the Panel, AT provides the following high-level comments with regard to the conditions of consent. The provision of these comments should not be viewed as indicating support of the application, and AT kindly requests that they be included in any future discussions regarding transport related conditions.	The suggestions regarding consent conditions have been considered accordingly, and an updated set of proposed conditions are contained within Attachment B .
20.	Ardmore Airport Limited			
20.1	Ardmore Airport	Reverse Sensitivity	Page 3 – Reverse sensitivity is one of the most serious concerns of Ardmore Airport when accessing the proposed Sunfield development. There are examples of the existing rights and operations of an airport, or other facilities, that are reduced, restricted or stopped by special interest groups, new and established communities. There is also a risk of future residents and businesses finding the airport operations and noise surprising and/or annoying. The risk is that lobbying for the airport to be restricted or closed due to the high noise, repetitive aircraft movements and perceived risk of aircraft accidents and/or personal safety due to the proximity of aircraft to outdoor areas tops of buildings will most certainly occur. Residential development adjacent to airports can, and does, give rise to material constraints on airport operations because of reverse sensitivity effects. Such constraints threaten to undermine the current operations, future growth and development of the airport and airport businesses.	Please refer to the section 55 Planning Response Report, and referenced attachments.
20.2	Ardmore Airport	Regional and Airport Economic Activity	Page 3 and 4 – The airport has been in existence since the 1940's and has been undergoing a stage of renewal and growth over the last ten years. In a recent twelve month period over 785 different aircraft used Ardmore Airport and this number is expected to double in the next 5 to 10 years with helicopter activity already doubling in the last six years. This includes essential services including rescue helicopter, police, ambulance and coastguard. <i>Ardmore Airport Limited, PO Box 72253, Papakura, Auckland 2244 Tel: +64 9 298 9544 Fax: +64 9 298 6213 www.ardmoreairport.co.nz Email: reception@ardmoreairport.co.nz</i> The airport now has over 108 aviation tenants and by the end of 2025 this number will increase. These businesses rely on the airport remaining sustainable, open and unrestricted within its current operating consents. Any restriction to the airport and aviation operations places an enormous risk on these local businesses and their employee's. Due to Ardmore Airports presence in the national aviation infrastructure there is also a risk to the New Zealand aviation sector if restrictions occurred.	Please refer to the section 55 Planning Response Report, and referenced attachments.
20.3	Ardmore Airport	Infrastructure and Transport	Page 4 - The Sunfield proposal proposes to close and realign Hamlin Road which is a primary access road to Ardmore Airport. Closing Hamlin Road for any amount of time is unacceptable. Ardmore Airport requires full and unrestricted access 24 hours per day for emergency and business access. Ardmore Airport has substantial growth plans and transport is a key aspect of this. Ardmore Airport is also concerned about the new Notice of Requirement for Mill Road and how this will integrate with existing access and growth plans. A commitment to a working group to resolve these issues and wider infrastructure is required.	Hamlin Road west is not essential access to Ardmore Airport. There is suitable alternative access via Airfield Road and Corsair Lane. Hamlin Road south will also remain open and provide access to Ardmore Airport. The Applicant is open to discussing access arrangements and infrastructure provisioning with Ardmore Airport.

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20.4	Ardmore Airport	Safety Risks – Public, Aircraft & Pilot Consequences	Page 5 – The approach and take-off from the main runway has clearly defined minimum approach angles. These angles then dictate the allowable obstruction heights from the ground thus ensuring that aircraft have a safe clearance from ground obstructions such as trees, structures or buildings when on approach for landing or take-off from the airport. We are concerned that the Sunfield application does not appear to take into account the risk of an aircraft having any failure or sudden lack of engine performance. With a minimal buffer from the top of the proposed buildings and the predetermined approach and take-off angles the risk to pilots, public and residents is much higher with the proposed Sunfield development and a lack of safe land out areas. Aircraft can be affected by air turbulence, varying performance characteristics and either temporary or permanent engine failure. When these circumstances occur the time for pilots to respond is very short and they require options for emergency landings or sufficient height from obstacles to regain control. It is during this time when an aircraft is going through its initial power cycle that is most at risk. It is for this reason that all aviation students are taught simulated engine failures after take-off. These training sessions would take place over the Sunfield development and may prove disconcerting for residents and visitors. This is not only a safety risk but again introduces further risk of reverse sensitivity occurring. Residents and businesses living and working under low altitude aircraft undergoing standard training, approach or take-off procedures will soon give rise to safety concerns and actively lobby for the airport operations to stop or change.	This has been addressed within the original application, and the subsequent Airport Safety Memorandum prepared by L&R Airport Consulting contained in Attachment J .
20.5	Ardmore Airport	Effects on Residents, Health Care and Aged Care	Page 5 – To assess the effects of the airport operations on Sunfield residents, healthcare and aged care requires an understanding of the total number and variety of aircraft and flight paths. This includes the current aircraft movements (100,000 pa), future aircraft movement (up to 250,000 pa), aircraft noise, jet aircraft, warbirds, commercial, recreational and helicopter proximity and vibration. The resulting effects of indoor and outdoor aircraft noise, repetition and vibration may be untenable without appropriate mitigation and design. The airport is open 365 days per year and is available for aircraft 24 hours per day. Historical annual flight movements exceeded 180,000 annually.	Acoustic impacts have been addressed within the Noise Response Report prepared by the Styles Group contained in Attachment K .
20.6	Ardmore Airport	General	B&A Appendix – Page 1 – While the comments identify a range of issues, Ardmore Airport is not opposed to development and seeks to work constructively with the Applicant to ensure an appropriate range of mitigation measures.	Noted
20.7	Ardmore Airport	Planned Development at Ardmore Airport	B&A Appendix – Page 2 – Ardmore Airport is currently home to more than 100 businesses and over 600 employees. Ardmore is fast-evolving into one of Auckland's largest industrial developments, building on the rich aviation history – and laying the foundations for businesses of the future.	Noted, with the planned development at Ardmore Airport considered complimentary to the Employment Precinct within the Sunfield development. It is also recognised that Ardmore Airport will need to factor in the required safety measures for their respective development.

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			Ardmore Airports business and industrial development comprises 15ha of consented land in the western portion of the site designed to accommodate a mix of business and industrial activities, identified as “Stage 2” in Figure 1 below, along with an additional 22ha which is currently being consented for business and industrial development referred to as “Stage 3”. Development within Stages 2 and 3 will be a mix of aviation related and non-aviation related activities, and will accommodate approximately 82,000m² GFA of industrial and commercial activities and approximately 2,300m² of retail activities. A further Stage 4 is planned to the east of Stage 3, on the remaining parts of the second runway, but is yet to be consented.	
20.8	Ardmore Airport	Land Use Configuration	B&A Appendix – Pages 5 and 6 – Ardmore Airport generally supports the extent and location of the proposed Employment Precinct adjoining the Ardmore Airport southwestern boundary. The Employment Precinct is located within the Aircraft Noise Overlay (65dBA inner noise boundary) and will be subject to the most significant noise effects resulting from Ardmore Airports ongoing and established operations. Ardmore Airport does not generally support the proposed location of the Health Care land use, located within Aircraft Noise Overlay (60dB inner control boundary), noting that hospital and healthcare facilities with an overnight stay are defined as activities sensitive to noise. The preference of Ardmore Airport is to relocate the Health care land use to the north of the proposed development, and to bring some of the proposed employment land use that is located entirely outside the Aircraft Noise overlay down into the inner two contours of the Aircraft Noise overlay. Ardmore Airport does acknowledge proposed Condition 142 requiring all new activities sensitive to noise within the Aircraft Noise Overlay boundary to be designed, constructed and maintained with sound attenuation and related ventilation to achieve an appropriate level of acoustic amenity, however this will not manage all adverse noise effects, including effects in outdoor living spaces and with doors and windows open. Ardmore Airport notes that the Sunfield development proposes both residential and aged care land uses within the 55dB (outer noise boundary) of the Aircraft Noise Overlay, both of which are activities sensitive to noise. While this is not the most desirable proposed land use in the outer noise boundary, given this is a greenfield development, Ardmore Airport do acknowledge that activities sensitive to noise in this outer contour are a Restricted Discretionary activity, and Sunfield development has proposed a suite of conditions and measures to manage the adverse effects of Ardmore Airport’s ongoing and established operations.	A new condition has been proposed stating that no residential dwellings or healthcare facilities with overnight stays are to be located within the 60db to 65db Noise Contour Boundary.
20.9	Ardmore Airport	Planted Buffer along Ardmore Airport Boundary	B&A Appendix – Pages 5 and 6 – Ardmore Airport generally supports the proposed eastern greenway and northern greenway and associated buffer planting identified in the Masterplan along the Ardmore Airport property boundary.	Noted, with condition 31 proposed to ensure selected plant species and maintenance mitigate any potential effects on the operation of the airport through wildlife activity.

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20.10	Ardmore Airport	Noise and Reverse Sensitivity effects on Ardmore Airport	B&A Appendix – Pages 7 – The Sunfield development will be subject to frequent overflights of low flying aircrafts which, may result in adverse health effects for future residents and an increased risk of future restriction being imposed on Ardmore Airport. As noted in the letter of Ardmore Airport, the current flight numbers are permitted to more than double in the future. Proposed condition 142 goes some way to mitigating the potential adverse effects, however it may not resolve all the adverse noise effects, including effects in outdoor living spaces and with doors and windows open. Ardmore Airport supports the inclusion of proposed condition 141, noting that Activities Sensitive to Aircraft Noise within the 65dB Aircraft Noise Contour Boundary are prohibited. In addition, Ardmore Airport supports the no-complaints covenant proposed to be placed on all titles within the Sunfield development, enabling Ardmore Airport to conduct all approved activities in accordance with Designation 200 in the AUP(OP). This should extend to including appropriate notices to occupants and residents of care facilities located on one certificate of title.	The proposed conditions and the respective commentary are noted and an updated set of proposed conditions are contained within Attachment B .
20.11	Ardmore Airport	Coordination of Ardmore Airport Stages 2 and 3 and Mill Road Stage 2	B&A Appendix – Pages 8 and 9 – The traffic modelling set out in the Sunfield Transportation Assessment prepared by Commute, does not include the traffic generated by Stages 2 and 3 of the Ardmore Airport industrial development. Stage 2 is consented, however not yet operating, and Stage 3 has recently been lodged with Auckland Council and is currently being processed. Stage 4 should also be considered, to the extent that aviation related industrial activities are permitted in the Ardmore Precinct (I401.4.1). An integrated and comprehensive transport network needs to be established for this area, which also includes the traffic effects of the Mill Road Stage 2 NoR recently lodged by NZTA. Ardmore Airport consider there is a need to develop and agree a transport network for the wider area that integrates planned development at Ardmore Airport, Sunfield as well as the Mill Road Stage 2 project.	The proposal has been amended to take into account the Notice of Requirement for Mill Road – Stage 2, with the necessary assessments contained within these assessments. It is noted that the co-ordination of Ardmore Airport Stages 2 and 3 with Mill Road Stage 2 is primarily a matter to be considered through the NOR process for Mill Road Stage 2, as this is out of the Applicant’s control.
20.12	Ardmore Airport	Mill Road Stage 2	B&A Appendix – Pages 9 and 10 – The Mill Road Stage 2 NoR has been lodged with Auckland Council. It is important that the Sunfield development provides for integration with the proposed alignment of Mill Road Stage 2. Ardmore Airport seeks a new roundabout at the intersection of the new Mill Road Stage 2 corridor and the existing alignment of Hamlin Road is included in the Sunfield development. Ardmore Airport does not support a road network where Hamlin Road is terminated either side of the Mill Road Stage 2 alignment. Ardmore Airport requests that the Sunfield development incorporates a new roundabout at the intersection of the new Mill Road Stage 2 corridor and the existing alignment of Hamlin Road into their proposed transport network.	The proposal has been amended to take into account the Notice of Requirement for Mill Road – Stage 2, with the necessary assessments contained within these assessments. It is noted that the co-ordination of Ardmore Airport with Mill Road Stage 2 is primarily a matter to be considered through the NoR process for Mill Road Stage 2 as this is out of the Applicant’s control.

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			Ardmore Airport supports the new Mill Road Stage 2 / Airfield Road two-lane roundabout proposed in the Mill Road Stage 2 NoR. Ardmore Airport requests that the Sunfield development incorporates this intersection into their proposed transport network.	
20.13	Ardmore Airport	Access to Ardmore Airport	B&A Appendix – Page 11 – It is essential that access to and from Ardmore Airport for its staff and users / visitors is maintained and provided for along Hamlin Road and Airfield Road at all times to ensure business continuity and for emergency services using the airport.	See response to comment 20.3.
20.14	Ardmore Airport	Hamlin Road	The proposed realignment of Hamlin Road to provide an East-West link through the Sunfield development is generally supported. However, it is important that the staging of the realignment of Hamlin Road is clarified and any temporary effects on the transport network are understood and catered for. Currently the upgrade to Walter Road / Cosgrave Road / Hamlin Road intersection is required after the first 50 dwellings within the development site (proposed condition 176), however the timing of the Hamlin Road realignment is not clearly set out. The staging plan prepared by Maven as part of the Sunfield development application notes that the realigned Hamlin Road is required for Stage 8 of the Sunfield development, however it is Ardmore Airport's view that greater clarity needs to be provided around the required timing of the realigned Hamlin Road being constructed and operational.	NZTA has confirmed that Hamlin Road west of MR2 will be dissected and therefore no direct access from Hamlin Road west will be available to Ardmore Airport. This will primarily need to be a matter considered under the NoR process for Mill Road Stage 2 as this is out of the Applicant's control.
20.15	Ardmore Airport	Airfield Road	The Sunfield development proposes upgrades to the Mill Road / Airfield Road intersection. It is important that the design of this intersection takes into account Ardmore Airport traffic generation, as well as access to Ardmore Airport via Airfield Road being maintained during all stages of construction of the intersection upgrade. It is recommended that this is managed via a Construction Traffic Management Plan.	Noted.
20.16	Ardmore Airport	Consent Conditions	Ardmore Airport seeks the following conditions be amended, to ensure the matters raised above are appropriately managed.	The proposed amendments by Ardmore Airport to the offered conditions have been considered accordingly and an updated set of proposed conditions are contained within Attachment B .
20.17	Ardmore Airport	Noise Assessment	Marshall Day Acoustics	The matters raised within the Marshall Day Acoustics Report have been addressed within the Noise Response Report prepared by Styles Group attached as Attachment K .
21.	New Zealand Transport Agency (NZTA)			
21.1	NZTA	Amended Sunfield Proposal	Para 2.5 - Following lodgement of the NoR, Winton and NZTA have had initial discussions to explore how the Sunfield development may be modified to respond to the NoR. Discussions between NZTA and Winton are ongoing, and conceptually it appears that there may be a possible integrated solution from a stormwater perspective. Para 2.6 – Winton has not yet amended its application to reflect these discussions, nor has it provided information on what the proposal involves to the Panel. As such we anticipate that further work is required in order to assess the effects of the changes and amend the technical assessments. Consequently, NZTA is currently limited to commenting on the Application as	Whilst the Sunfield Fast-Track application predates the lodgement of the proposed NZTA Mill Road – Stage 2 NoR, following lodgement of the NoR by NZTA an amended proposal has been developed which factors in the Mill Road – Stage 2 corridor. This has included input from NZTA regarding the layout of the Sunfield development, traffic impacts and an integrated stormwater solution.

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			lodged, which, as previously noted, does not address the presence of the NoR. NZTA requests the opportunity to comment on the amended proposals once they are lodged with the Panel.	
21.2	NZTA	Requiring Authority – Written Approval	Para – 5.6 To date, Winton has not sought written approval from NZTA for these activities. In its current form, the proposed activities associated with the Sunfield development are conflicting with the NoR and would prevent and hinder the Mill Road Project. Accordingly, NZTA is not able to provide approval under s176/178 of the RMA to Winton in its current form.	A joint statement from Winton Land Limited and NZTA regarding recent engagement is contained within Attachment D .
21.3	NZTA	Transport Effects	Para 6.3 – Appendix 1 contains a technical note provided by Mr Andrew Murray, Technical Fellow – Transport at Beca. This technical note provides some preliminary comments relating to the potential impact of the Sunfield development on strategic components of the transport network (including State Highway 1 and the Mill Road Corridor). Para 6.4 – To summarise the key findings of the transport technical note: (a) – (k).	Appendix 1 and Paragraph 6.4 of the NZTA comments outline transport related concerns with the proposed Sunfield development. These matters have been addressed within previously submitted information by the applicant, and within the additional information contained within the Transportation Response Report prepared by Commute attached as Attachment H .
21.4	NZTA	Transport Conditions	Para 6.5 – Given the consequences of the site not delivering the assumed outcomes, Mr Murray recommends that: a) Enforceable staging and monitoring systems are used to manage the potential adverse effects including conditions relating to: i. Car ownership; ii. The provision of employment and service facilities in the development concurrently with residential dwellings; iii. The level of internalisation within the development; and iv. The provision infrastructure to support the mode shift assumptions including walking, cycling and bus services. b) Each stage of development be based on a new ITA, that considers the status of each of these important areas, along with the monitoring data on the observed outcomes for preceding stages.	The originally submitted application provided a set of proposed conditions to mitigate effects associated with staging. An updated set of proposed conditions following comments being received is contained within Attachment H , which includes conditions (123 and 123A) to address the monitoring of trip generation and the potential for future intersection upgrades.
21.5	NZTA	Stormwater Effects	Para 6.8 – A technical note has been provided by Mr Roger Seyb, Technical Fellow – Water Resources at Beca Limited. This technical note provides some preliminary comments relating to the potential impact of the Sunfield development on the management of stormwater and the implications on the Mill Road Corridor. The technical note is provided at Appendix 2 . Para 6.9 – To summarise the key findings of the transport <i>[stormwater]</i> technical note: (a) – (e). Para 6.10 – To ensure that stormwater is appropriately managed in an already sensitive and flood-prone area, Mr Seyb considers that the following information is required: a) Flood levels on the western boundary of the NoR; b) Detailed information about how the design of the proposed diversion channel provides for the loading of the future NoR embankment; c) Modelling results demonstrating that flood levels along the western NoR boundary will	Appendix 2 and Paragraphs 6.9 and 6.10 of the NZTA comments outline stormwater related concerns / queries with the proposed Sunfield development. These matters have been addressed within previously submitted information by the applicant, and within the additional information contained within the Stormwater and Flooding Response Report prepared by Maven attached as Attachment N .

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			not increase following bulk earthworks and drainage construction;	
21.6	NZTA	General Summary	Para 6.12 – In its current form, the proposed activities associated with the Sunfield development are conflicting with the NoR and would prevent and hinder the Mill Road Project. Accordingly, NZTA is not able to provide approval under s176/178 of the RMA to Winton. Notwithstanding this, collaborative discussions between NZTA and Winton are continuing, however, it is not clear when amendments to the application to reflect these discussions will be submitted to the Panel. Without this information, NZTA is unable to complete its assessment of the effects of the Sunfield development. Therefore, NZTA requests the opportunity to provide comment on any updated information provided by Winton to the Panel.	See response to comments 21.1 and 21.2.
22.	Ngāi Tai ki Tāmaki			
22.1	Ngāi Tai ki Tāmaki	General – Process / Flooding / Engagement	When this proposal was introduced to our team in I believe 2022, we had concerns at the ambitions under the UDA for the site, which we know to be peat-heavy, with a high intensification masterplan. The intention to fast track this process felt like a means to skip due process and the level of diligence that gives us confidence that the outcomes of a housing development will not only better the lives of those housed, but care for the environment through appropriate mitigations and all the attached reports were not done in 2022 when this process was first brought to us. We have since read the attachments, and while the reports are quality in and of themselves, as an iwi who has lived in close proximity to these floodplains for centuries, it is high risk to attempt to build such high density in this area. Based on this and the lack of reporting regarding consultation with our whanaunga iwi to reassure us someone representing te Ao Māori has been alongside this planning process, we cannot support this kaupapa.	The fast-track application intent and process is outlined within the Fast-Track Act, which is out of the control of the Applicant, with the application providing a fulsome assessment of the effects and statutory provisions. Engagement with Mana Whenua and flooding matters are outlined and addressed within previously submitted information by the applicant, which have been further outlined within the memo provided by Navigator in Attachment V.
23.	Te Whakakitenga o Waikato Incorporated (Waikato-Tainui)			
23.1	Waikato-Tainui	Engagement with Iwi	Para 14 – While Sunfield Developments Limited (SDL), via Navigator, contacted all 19 iwi authorities in March 2021 as part of its previous UDA application—and six iwi indicated their interest in the development—those same iwi were only advised in April 2024 of the shift to the Fast-track process. In our view, this change warrants a renewed opportunity for meaningful engagement and input. It is essential that whaanau are not constrained by the reduced timeframes characteristic of the Fast-track process when providing their feedback. Para 15 – At a minimum, there should be a revision of the iwi input provided to date. Feedback that may have been appropriate under the UDA may not fully capture iwi views in the context of the Fast-track process, which presents more limited avenues for participation. Iwi should	Engagement with Mana Whenua is outlined within the original application and clarified within the memo provided by Navigator in Attachment V. It is noted that iwi have provided feedback to the proposed conditions, and this feedback has been incorporated into an updated set of proposed conditions contained within Attachment B.

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			be given the opportunity to revisit their earlier positions and provide revised or additional input that reflects the current statutory framework. Para 16 – Waikato-Tainui will continue to monitor the inputs provided by our affiliated marae and hapuu to date and throughout the Fast-track process. We reserve the right to provide further iwi-specific feedback as necessary, particularly where we consider that our interests or those of our affiliated marae and hapuu have not been fully reflected or considered in the proposal or associated engagement processes. Where appropriate, we will also support the positions of mana whenua who hold direct interests in the site and whose views align with the protection of cultural values and responsibilities. Para 21 – We note the inclusion of cultural monitoring and mana whenua involvement in the draft conditions, which is positive in principle. However, at this point, it is unclear whether mana whenua have had sufficient time or capacity to review the latest version of the consent conditions in detail, or to assess whether their cultural and ecological concerns have been meaningfully incorporated into the design.	
23.2	Waikato-Tainui	Engagement with Auckland Council	Para 17 – Of particular interest is the limited level of engagement or response from Council on these matters. In our experience, Council typically maintains a strong interest in developments within flood-prone areas, particularly where public infrastructure, downstream capacity, or liability may be affected. The absence of clear Council involvement raises questions about whether there are unresolved concerns or gaps in information that have yet to be addressed. Para 18 – This leads us to ask: what aspects of the current proposal may be contributing to that disengagement? Is further work required to satisfy Council’s expectations around long-term resilience, asset ownership, or downstream impacts? From our position, these questions remain open, and a more transparent understanding of Council’s stance would support greater confidence in the development’s ability to manage flood risk over time.	Auckland Council are fully engaged in the process, with their feedback provided under Comment No. 17 and respective documents.
23.3	Waikato-Tainui	Potentially Productive Land	Para 23 – The Waikato-Tainui remains committed to the protection and retention of highly productive land within our rohe, consistent with our contributions to the development of the NPS-HPL and our broader responsibilities as kaitiaki. While we acknowledge that the Sunfield site may face limitations — including heavy clay soils, drainage constraints, and fragmented land ownership — we remain concerned that its classification as highly productive land under the NPS-HPL may be too easily set aside. Para 24 – In our view, the absence of LUC class 1 land does not, on its own, justify the conversion of this whenua from its productive potential to intensive housing and infrastructure use — particularly when other areas in the region with higher-quality soils remain under threat from development. The long-term value of retaining productive land must be assessed not only in economic terms but through a lens of intergenerational food security, resilience, and cultural significance. Accordingly, we advocate for a precautionary	Highly Productive Soils have been addressed within previously submitted information by the applicant, with additional information provided within the memorandums from Landsystems (Attachment S) and the NPS-HPL Assessment prepared by AgFirst (Attachment T).

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			approach and for the maximum retention of productive land where feasible, especially in areas where Maaori interests in land use and food systems remain active and enduring.	
23.4	Waikato-Tainui	Flood Risk	Para 25 – The site’s location within a floodplain is acknowledged, and it is noted that an engineering solution has been proposed to manage associated risks. From a governance and oversight perspective, further clarity may be needed on how that solution accounts for future climate projections, including increased frequency and intensity of rainfall events. Given the long-term nature of residential and community infrastructure, assurance around how flood risks will be managed over several decades is an important consideration. Para 26 – It may also be useful to understand the assumptions and margins built into the modelling to ensure the design remains effective as conditions change. For example, clarification on how extreme event thresholds, catchment changes, and projected urbanisation have been factored in would support confidence in the resilience of the proposed system. Para 27 – While the response refers to peer-reviewed stormwater modelling, it appears that the focus remains on technical compliance rather than broader long-term exposure to risk. A more detailed discussion of potential consequences if the mitigation does not perform as intended — particularly during high-impact weather events — could assist with risk transparency and planning. Para 28 – There is also limited discussion of the wider hydrological context. As stormwater systems extend beyond individual sites, a clearer picture of how downstream catchments, neighbouring properties, or public infrastructure may be affected — and how any risk is shared or managed — would be valuable. Para 29 – It is not clear whether the development intends to include long-term monitoring of flood performance or adaptation measures in the event conditions change. Some visibility of how performance will be tracked over time, and what triggers any future upgrades or interventions, would help ensure the system is not only compliant at the outset but continues to protect residents and infrastructure into the future.	Flooding and stormwater matters have been outlined and addressed within previously submitted information by the applicant, and additional information is provided the Stormwater and Flooding Response Report prepared by Maven in Attachment N .
23.5	Waikato-Tainui	General	Para 33 - Waikato-Tainui makes the following recommendations as a starting point for further engagement, clarification, and refinement of the proposal: • Enable iwi and hapuu to revisit their input under the Fast-Track process, at the applicant’s expense. • Ensure that cultural values are embedded in outcomes, not just acknowledged through process. • Provide clarity on Auckland Council’s position regarding flood risk and infrastructure delivery.	These matters have been addressed within previously submitted information by the applicant, within the attached summary table, and within the respective reports forming part of this section 55 response.

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			- Strengthen certainty around the implementation and long-term performance of stormwater infrastructure. - Reassess the treatment of productive land in line with the intent of the NPS-HPL.	