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RE: **SUNFIELD DEVELOPMENT – FAST TRACK SUBSTANTIVE APPLICATION
IN RESPONSE TO ARDMORE AIRPORT SUBMISSION**

Ardmore Airport Limited (Ardmore Airport) provided a response to the Sunfield Development Fast Track Substantive application on 4 August 2025.

The Ardmore Airport response concludes that there is concern about the Sunfield Development that places a risk on the airport operations and economic viability of Ardmore Airport. Concerns raised generally related to safety risks to the public, aircraft and pilots. Reverse sensitivity and traffic issues are also raised and covered by others within the Sunfield Fast Track Substantive application team.

As noted in the L+R Airport Consulting *Proposed Sunfield Development – Ardmore Airport Safeguarding* March 2025 (L+R Safeguarding Report) which was submitted as part of the Sunfield Development – Fast Track Substantive Application, Ardmore Airport is recognised under the Auckland Unitary Plan (AUP) which provides for a Designation Schedule specific to Ardmore Airport. The Designation Schedule - Ardmore Airport Ltd the purpose of which '*is to provide for the efficient operation and growth of Ardmore Airport by enabling airport activities and flights while defining airport approach and land use controls*'. These conditions and restrictions specifically relate to development heights, land uses and various requirements relating aircraft noise and other airport operational matters.

The L+R Safeguarding Report addresses aviation safeguarding and compatibility of the proposed Sunfield development as it relates to Ardmore Airport. This airport safeguarding report was based on information within the AUP Designation Schedule 200. Where specific Auckland Unitary Plan provisions do not address all aspects which, in our experience, constitute sound airport safeguarding practice, reference has been made to the Australian National Airports Safeguarding Framework (NASF), in line with the guidance in the New Zealand Airports Association (NZAA) Airport Master Planning Best Practice Guide.

As noted in the L+R Safeguarding Report, the NASF is the accepted land use planning framework, in Australia, for the protection of airport operations from incompatible surrounding development. The NASF stated purpose "*...is to enhance the current and future safety, viability and growth of aviation operations...*". NASF includes nine (9) guidelines to guide decision makers in regulating and managing developments around airports, as follows:

- § Measures for managing intrusion by aircraft noise (Guideline A) (not addressed by L+R);
- § The risk of building generated windshear and turbulence at airports (Guideline B);
- § The risk of wildlife strikes in the vicinity of airports (Guideline C);
- § The risk of wind turbine farms as physical obstacles to air navigation (Guideline D);
- § The risk of distractions to pilots from lighting in the vicinity of airports (Guideline E);
- § The risk of intrusions into the protected operational airspace of airports (Guideline F);
- § Protection of on and off-airport Communication, Navigation and Surveillance equipment (Guideline G);
- § Protection of strategically important helicopter landing sites (Guideline H); and
- § Public safety areas at the end of runways (Guideline I).

The L+R Safeguarding Report evaluates the proposed development against the AUP Designation Schedule, specifically the height and land use restrictions, as follows:

- § Buildings are proposed to remain below the height restrictions within the AUP; and
- § The Rural Aerodrome Protection Areas are identified in the Designation as areas that may be adversely affected by aircraft noise or which may detrimentally affect the safe operation of aircraft. The Sunfield Master Plan does not propose any development within the Rural Aerodrome Protection Areas, notwithstanding any structures up to 4 m high as is permitted in this area.

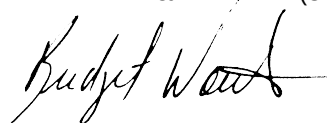
Ardmore Airport have raised, specifically, the risk of aircraft having failure or sudden lack of engine performance, with this more likely to happen during take-off over the Sunfield Development. This matter is factored into the airport safeguarding and the AUP restrictions, specifically the Rural Aerodrome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

In Australia, there are several similar airports to Ardmore Airport, which host movement numbers in excess of 200,000 per year with a flight training focus include Moorabbin, Jandakot, Archerfield, Parafield and Bankstown Airports. These airports co-exist successfully with their surrounds including substantial light industrial and residential development within the circuit and final approach areas.

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

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

Yours faithfully,
For and on behalf of
LAMBERT & REHBEIN (SEQ) PTY LTD



B. WOUTS
PRINCIPAL CONSULTANT
AVIATION