

16 February 2026

Expert Panel
Sunfield Fast-track Application
FTAA – 2503 -1039

Dear Expert Panel,

SUNFIELD [FTAA-2503-1039] – SUNFIELD EMPLOYMENT PRECINCT PARKING RATIOS

I, Leo Hills of Commute Transportation Consultants, confirm that this letter was prepared in accordance with the Environment Court Practice Note 2023 (Code of Conduct for Expert Witnesses). Details of my qualifications and relevant experience has been provided to the Expert Panel previously.

This letter relates to the potential provision of parking maximums within the employment precinct of Sunfield. I note there are two proposed conditions within the Expert Panel's draft decision for the Sunfield master planned community relating to parking maximums in the employment precinct. These state:

- [112A] Parking for office activities within the employment precinct shall be provided at a maximum of 1 per 300m² of gross floor area.
- [112B] Parking for manufacturing / warehouse / industrial activities within the employment precinct shall be provided at a maximum of 1 per 500m² of gross floor area.

In this regard the Commute Integrated Traffic Assessment February 2025 (the "ITA") (page 67) contained recommendations regarding parking maximums for the employment precinct which essentially match these draft conditions. I also note Mr Harries, in his transport review, has also recommended these conditions.

I have now also reviewed the letter from Mr Mike Bayley (Chairman and Managing Director of Bayley Corporation Limited). In this letter Mr Bayley states:

"I am aware of the proposed condition of consent relating to the maximum car parking ratios for the employment precinct at Sunfield. Based on my experience in the industrial sector, the proposed ratios of a maximum of 1 car park per 300m² for office activities and a maximum of 1 car park per 500m² for manufacturing / warehouse / industrial activities are too prohibitive and if implemented would have a detrimental effect on the ability of Winton to successfully develop the employment precinct at Sunfield".

From my review of this latest information and upon further consideration:

- I consider it imperative that the employment precinct is able to be successfully developed within the Sunfield master planned community. As noted in the ITA, the Sunfield master planned community includes provision of schools, town centre, local centres and an employment zone to enable and encourage residents to live, shop, play and work in the Sunfield master planned community.
- The employment precinct is essential in allowing residents who live in Sunfield to work locally and therefore reduce their external traffic outside Sunfield. Without its success, all residents will essentially need to travel outside of Sunfield thereby increasing trip rates.

- Section 9.6.1 of the ITA contained a spreadsheet of alternative mode share analysis of the site which assumed 50% of all employees in Sunfield live in Sunfield (regardless of mode). Without the success of the employment precinct, and the employment opportunities it will create, the vast majority (significantly over 50%) would need to leave the Sunfield area for employment.
- Following production of the ITA there has been further development in the traffic modelling including an assessment of a less constrained 3,000 vehicles per hour scenario which includes (among other things) traffic generation of the employment precinct which would not have such close interaction with the residential land and would not have any parking restrictions (see Commute's memo dated 12 November 2025).
- Also following production of the ITA, and in discussion with Auckland Transport and following questioning by the Panel at the hearing, a proposed monitoring / check condition of consent (123A) has been added. This ensures that in early / mid development stage, after 1,350 and 2,700 residential dwellings, the trip rates will be reviewed / monitored to determine if they are valid and if any additional physical mitigation and / or additional measures are needed to reduce trip generation. This includes an assessment of whether the traffic generation associated with the Sunfield development is in accordance with the submitted ITA (1,100vph for Sunfield in its entirety). This will necessarily include the external traffic generation of the employment precinct.
- Travel Plans for each business operating within the employment precinct are also required. The Travel Plan will set out the measures that each business must adhere to in order to:
 - Maximise the use of active transport modes, public transport, carpooling, ride sharing and micro-mobility.
 - Minimise private vehicle trips and private carparking availability.
 - For warehouse distribution operations, require 75% of related vehicle movements to be confined to off-peak hours only (i.e. outside the hours of 7-9am and 4-6pm Monday to Friday).

Essentially the suite of conditions now encourage and monitor traffic generation of the entire Sunfield master-planned community. If the actual traffic generation across the development is higher than originally assessed within the ITA, then additional mitigation measures will need to be implemented (as per the Commute memo dated November 2025 memo). Of significant note this includes traffic generation from the employment precinct.

Overall, it is my opinion that the success of the employment precinct is more important than including maximum parking rates within the employment precinct (especially if these maximum parking rates impact on the viability of the employment precinct).

The Sunfield conditions of consent are now significantly advanced from when the ITA was produced in February 2025. In my opinion there are appropriate and sufficient safeguards provided within the Sunfield conditions of consent that means that parking maximums within the employment precinct are now not specifically required.

Should the Expert Panel deem that parking maximums within the employment precinct are required, I would recommend market standard ratios of:

- Parking for office activities within the employment precinct shall be provided at a maximum of 1 per 30m² of gross floor area.
- Parking for manufacturing / warehouse / industrial activities within the employment precinct shall be provided at a maximum of 1 per 250m² of gross floor area.

Yours sincerely

Commute Transportation Consultants



Leo Hills

Director

