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Mr S Ash
Chief Operating Officer
Winton

17 July 2025

Copy via email: [redacted]

Dear Simon,

SPECIALIST COMMENTS RESPONSE – SUNFIELD DEVELOPMENTS LIMITED RESPONSE TO AUCKLAND COUNCILS MEMORANDUM

Further to your recent instructions, we have reviewed Auckland Council comments dated 16 June 2025 and have responded to the transport matters raised.

1 TRANSPORT

1.1 ITEM 2.1.1 – MILL ROAD

Request:

The Sunfield proposal does not account for the proposed Mill Road 'road of national significance' project, and this proposed road alignment would have a significant impact on the proposal and hence it would also significantly impact the potential delivery of the project. Consequently, the proposal's roading network does not reflect or integrate with the anticipated Mill Road corridor. The following information gaps are identified:

a) *An assessment is required against the Mill Road Notice of Requirement (NOR) that was lodged by NZTA on Friday 13 June 2025 and for which the designation has interim immediate effect and now forms part of the receiving environment. This should include an assessment of traffic conditions around the site.*
b) *The existing transport assessment should be updated to consider the Mill Road NOR in the design of the proposed internal roads and in terms of the assessment's underlying assumptions. For instance:*

- *Whether an arterial road through the development has any impact on the transport assessment's intention of a 'car-less' development, particularly on active mode and connections to the employment areas; and*
- *Whether the road would affect the envisaged employment district and the trip generation and network assignment assumptions; and*
- *Whether Mill Road could impact the proposed idea of the Sunfield 'loop' road and connections to adjoining AT road networks; and*
- *Any other implications for proposed network and land use activities and travel demand measures; and*
- *Any changes to offered conditions of consent including those relating the staging of development and networks.*

c) *The consultation summary should be updated to include any consultation between the applicant and NZTA with regards to the Mill Road project.*

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Note: We recommend the Panel considers issuing a direction for the Applicant to arrange conferencing between themselves, AT, Auckland Council and NZTA to discuss the implications of the Mill Road NOR to Sunfield.

Commute response:

In terms of item A and B we note that the ITA was produced before the lodgement of the NoR on 13 June 2025 and Commute had no knowledge of the imminent NoR lodgement when their fast-track application was lodged.

We do however agree that the ITA / transport assessment will require some amendments / updating to account for the NoR. In this regard, there have been subsequent discussions with NZTA and their consultants in regards to updated traffic modelling which NZTA consultants are currently undertaking. The results will be reported back to the panel asap however in general:

- The NoR (four lane arterial) will have an impact on the local road network in the area;
- It will provide significantly increase traffic capacity and network connectivity both in the local area but also regional connectivity; and
- It will generally reduce levels of traffic from the local area intersections.

In terms of the consultation summary, prior to lodging the Sunfield Fast-track application, SDL endeavoured to engage with NZTA but with limited success. Lodgement of the NOR – Mill Road Stage 2 was made on the 13th June 2025. Engagement between SDL and NZTA has occurred at meetings on four occasions since the 28th of May 2025, subsequent meetings took place on the 18th June, 23rd June and 2nd July 2025.

1.2 ITEM 2.2.1 – TRIP GENERATION AND MODELLING

Request:

The Applicant should provide assessment for various sensitivity test scenarios to provide more confidence that the network can respond to a range of possible future scenarios and still function. Auckland Transport (AT) recommends that the Applicant undertake transport modelling for at least two scenarios where the proposed methods to reduce trip generation are less effective. This should include scenarios where lower internal employment rates are assumed. The following is requested with regard to transport modelling:

a) *AT notes the 0.65 trip generation figure used in the transport assessment for 'standard' residential developments might be higher. An updated modelling assessment should relate this figure back to relevant trip generation standards or other development. In this regard AT notes other Commute transport assessments have noted up to 0.85 residential trip generation rates.*
b) *The transport assessment notes that the underlying assumptions need to be in place to achieve the mode share proposed and that "planning provisions" are important in delivering this mode share. The updated transport assessment needs to clarify what these planning provisions are and how they will be effective.*
c) *Clarify if and how the proposed internalisation (50%) of trips affects their assumed vehicle trip distribution assessment.*
d) *Clarify why 10 years was used for transport modelling when the proposed development is intended to take 15 years.*
e) *Confirm if the provision of car share parking spaces (ratio of 1:11.5) has been accounted for in the trip generation rates assumed.*
f) *The Cosgrave Rd/ Walters Rd/ Hamlin Rd intersection appears incorrect in terms of the land configuration. Confirm if the layout of this intersection as used in the transport model is correct.*

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Commute response:

In general, we note that due to the imposition of the proposed Mill Road Stage 2 (MR2), the project traffic modelling will require to be reviewed and updated. Commute are currently liaising with NZTA over the traffic modelling data.

MR2 will have wide reaching effects on the Sunfield proposal and the adjoining transport network, these effects will need to be carefully considered and understood. The applicant is happy to work through any external impacts (intersection, cycle, micromobility, pedestrian and road upgrades) identified through the subsequent update of the Sunfield ITA.

Specifically:

Item (a)

The traffic generation rates have been further reviewed to check their appropriateness. In this regard:

- Commute have used 0.85 trips per dwellings for other sites however these are typically for sites with limited public transport, not close to employment and single dwellings (not large developments).
- A rate of 0.65 trips per dwelling has been used in the ITA analysis for the AM and PM peak (RTA guideline for 3+ bedrooms in medium density residential flat building medium density housing).
- The RTA guide has recently been updated by the TfNSW Guide to Transport Impact Assessment (November 2024)
- The TfNSW suggests the following trip generation rates for medium density residential dwellings (Regional) based on 2012 surveys in Australia:
    - AM peak – 0.41 per dwellings
    - PM peak – 0.60 per dwellings

This is likely due to changes in work habits since the original RTA surveys in 2002 including, wider congestion in Auckland (peak spreading) and the ability for workers to more easily remotely work / work from home.

As such the rates in the ITA are considered appropriate.

Item (b)

We agree with the comment re underlying assumptions in regard to mode share.

Item (c)

The 50% proposed internalisation essentially means 50% of the employees in Sunfield also live in Sunfield and as such do not generate any external traffic.

Item (d)

10 years is a typical period used in large development sites. The 15-year time period is an estimate of full build-out. The 10-year period is slightly more conservative.

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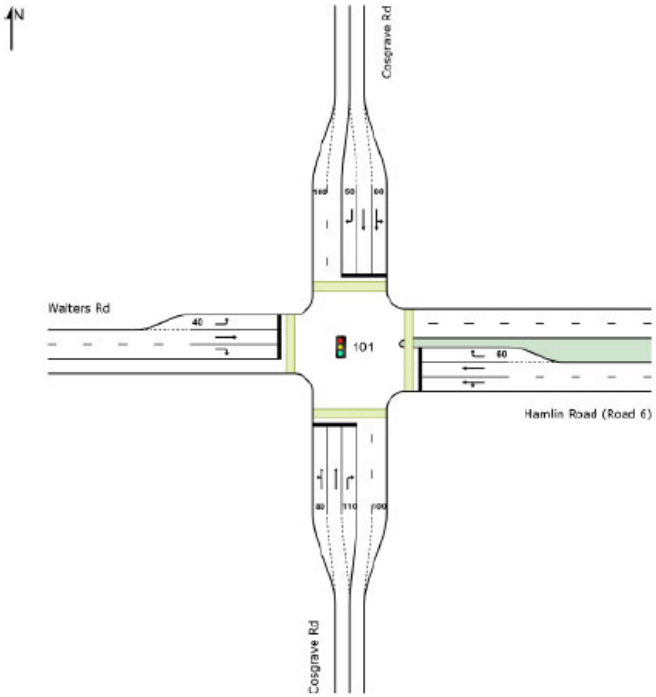
Item (e)

A number of car-less measures including the provision of car share parking spaces, has been used in the assumed reduction in overall trip generation.

Item (f)

We are unsure of the exact question / comment. However, the Cosgrave Road/ Walters Road/ Hamlin Road intersection has been modelled as per Table 9-2 of the ITA (shown below)

Cosgrave Road / Walters Road / Hamlin Road (Road 6)



1.3 ITEM 2.2.2 – MONITORING

Request:

The ITA states that continuous monitoring is recommended to ensure the desired modal share is achieved. It is recommended that a robust set of monitoring conditions are provided by the Applicant to ensure that caps are in place when the number of trips exceed the trip generation anticipated in the ITA. The monitoring conditions may be similar to other locations where the number of vehicle trips are restricted such as Auckland's Wynyard Quarter or the Beachlands South Precinct Plan (Precinct I458 in the Auckland Unitary Plan).

Commute response:

The applicant is open to collaboratively drafting a monitoring condition to ensure the desired modal share is achieved.

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1.4 ITEM 2.3.1 – CAR OWERNSHIP

Request:

The measures to avoid car ownership include preventing homeowners from owning a car(s) through covenants or similar (see 12.3 of the ITA) as well as significant physical parking restrictions are questioned. Aside from the fact that the Applicant's draft conditions do not appear to implement this proposal, the Applicant should in any event provide further evidence as to the legality, enforceability and effectiveness of the mechanisms they have proposed, and other potential mechanisms should the proposed solutions be determined to be unable to be implemented.

Commute response:

The measures proposed to support a car-less outcome for the Sunfield development include:

1. Design led restrictive pavements – Pavement surfaces will be designed to avoid facilitating car parking spaces within the residential areas.
2. Road marking and signage – no stopping marking and signage will be implemented in areas of no parking.
3. Residents Society – there will be an over aching resident's society that will have the power to enforce parking restriction and remove parked vehicles from restricted areas.
4. Incorporated Societies – each COAL will have an Incorporated Society attached that will have the power to enforce parking restriction and remove parked vehicles from restricted areas.
5. Alternative mode support – alternative modes of transport will be provided or supported. There is a loop road within the centre of the development that supports a dedicated bus lane and provides links to the local transport hubs in Papakura and Takanini. There are local hubs that provide ride share pick up and drop off locations along with charging and storage stations for micro mobility and cycling modes.

1.5 ITEM 2.3.2 – PC79

Request:

No assessment of the proposal with regards to the Plan Change 79 accessible parking requirements has been provided.

Commute response:

See planners' response.

1.6 ITEM OTHER – PARKING MANAGEMENT

Request:

AT does not consider that implementing parking management in neighbouring suburbs as a result of the high level of spillover parking is viable. It is also not an easily supported solution for AT. The following is also noted by AT:

a) *Parking restrictions within the Site and adjacent neighbourhoods would require significant resources for AT to continually enforce (and physically maintain). Essentially the Applicant will require AT to ensure the feasibility of the Applicant's proposal with regard to the proposed lower car ownership. This approach is generally not supported by AT.*
b) *AT can also note that the proliferation of parking restrictions can lose its adherence value over time as resident becomes overwhelmed and frustrated by significant number of parking rules.*

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c) *The legality and enforceability of banning car ownership is also questioned. This also does not seem to be a condition of the proposal due to sheer number of infringements.*
d) *Limited consideration is given to factors such as rain, wind or people requiring medical visits that make it difficult to walk or access amenities/bus stops if car ownership is only at 10%.*
e) *Plan Change 79 is now operative and the applicant should include an assessment against its provisions.*

Commute response:

Acknowledging these statements which are addressed following, point (e) Plan Change 79 has been addressed within the covering summary table.

a) As per the response in 2.3.1, the applicant is not proposing AT enforce the parking restrictions within the proposed Sunfield development.
b) Parking restrictions will be made clear to residents from the outset. SDL has a significant vested interest in adherence to the parking restrictions and will therefore be focused on monitoring the success of these.
c) There is no proposal to "ban" car ownership. What is being proposed is to provide credible alternative forms of transport so that car ownership is not required.
d) The bus stops, local hubs and neighbourhood service hubs will provide adequate shelter from the elements to accommodate alternative forms of transport other than private motor vehicle.

1.7 ITEM 2.4.1 – SUNBUS THRESHOLD

Request:

The draft conditions state that the Sunbus service be provided with the completion of 890 dwellings on site. However, the transport assessment notes that with the completion of 890 lots a frequent transit service is required between the site and the Papakura Town Centre and that it is recommended as a joint venture between AT and the Applicant. Clarification of this discrepancy between these two documents should be provided.

Commute response:

The transport assessment should read '890 dwellings'.

1.8 ITEM 2.4.2 – EARLY STAGES PT

Request:

Information on how the development will be serviced with public transport and internal employment in early stages of the proposal (including prior to 890 dwellings constructed) should be provided. There should also be an assessment as to whether this could cause earlier residents to remain reliant on private transport as they will have external jobs..

Commute response:

The development will be serviced by existing public transport options prior to the construction of the initial 890 dwellings. These services are outlined within section 4.5.2 of the Integrated Transportation Assessment Report.

- The first stages of development are to be in the southern portion of Sunfield, which will be within walking distance of Bus Route 372, a connection service to the wider network. Takanini will also have a dedicated local bus from April 2026, being Bus 364.

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- Several neighbourhood service hubs will be constructed and will provide storage and charging for micro mobility transport along with limited parking for private vehicles.
- The local hub will initially provide an at grade car park for private vehicles until the point that the internal public transport network is available.

1.9 ITEM 2.4.3 – OTHER TRANSPORT

Request:

Clear information on how the development will be serviced with other transport (i.e. private) during different stages of development without relying on AT to mitigate the effects should be provided.

Commute response:

This is considered to be outlined within the subject application and the responses in 2.3.1 and 2.4.2 and including the proposed conditions of consent regarding staging.

1.10 ITEM 2.4.4 – SUNBUS FUNDING

Request:

Additionally, the Applicant has not provided a funding mechanism to demonstrate that the proposed Sunbus service will continue to function.

Confirm how it will be managed in perpetuity and indicate the consequences or measures to ensure that the service does continue.

Commute response:

The Sunbus automated bus service will be initially funded by SDL and subsequently managed by a dedicated Incorporated Society.

The proposed Ohmio bus service 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 etc.

1.11 ITEM 2.5.1 – LINKING TO RAIL

Request:

The ITA states that part of the vision includes linking the site with Papakura town centre and rail station, and Takanini town centre and rail station. However, the draft conditions only include cycle facilities (shared path) on Cosgrove Road between Walters Road and Clevedon Road, and there are no requirements or triggers for wider network upgrades. This will not achieve the vision as the necessary connections are not made, and the proposed shared paths are not suitable for commuter cycling as these cyclists often prefer the road to shared paths. Thus, cycle uptake will not be effective in contributing to the necessary lower car trip rate. AT also highlights that shared path are generally only acceptable for short sections as they present a safety issue due to cyclist speeds.

Commute response:

This is generally a statement. Council has not requested any information.

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There are cycling upgrades proposed in the implementation plan of the ITA being "*Connect the development site to key local destinations by providing improved active mode facilities on Cosgrave Road between Walters Road and Clevedon Road*" which are proposed "*To be completed as part of the Stage 2 works*".

It is noted that the development site will connect to the future cycling network with the upgrades proposed. Figure 7-2 of the ITA shows the intended upgrades proposed by the development on Auckland Transport's Cycling and Micromobility Programme Business Case (CAM-PBC) map in the wider Takanini area (noting that these are future proposed link).

1.12 ITEM 2.5.2 – SHARED PATHS

Request:

AT also requests that the Applicant provide further justification for providing shared paths instead of separated walking and cycling facilities.

Commute response:

Shared paths are considered to have appropriate design treatments especially along roads which will have limited / no driveways (eg Cosgrave Road / arterial roads).

1.13 ITEM 2.5.3 – CYCLING CONNCTIONS

Request:

The transport assessment only assesses the site and three limited cycling connections from the site on the network. Additional assessment and likely, additional walking and cycling upgrades must be provided by the Applicant on the roads adjacent to their site but also on the wider network.

Commute response:

It is considered that the appropriate cycle connections have been addressed as part of the transport assessment given the nature of the surrounding transportation network and destination points. There will likely be other private connection (eg the school on Cosgrave Road) in additional to those shown in Figure 7.2 of the ITA. It is noted that Figure 7.2 of the ITA does not show a forth connection which is proposed being Road 6 (Hamlin Road) which is proposed to have 3m shared paths on both sides of the road.

1.14 ITEM 2.6.1 – LOOP ROAD

Request:

The application documents refer to a loop road which is a circular road within the development that allows vehicles and the proposed Sunbus to circle around the neighbourhood, the transport assessment indicates this on multiple plans. However other plans including the Engineering Plan – Proposed Roading External Intersection Overview Plan – M-C341 show that this loop has a gap and does not complete full circle. Confirm the roading layout and if the route is not continuous assess what implication this has for the proposed public transport route as well as walking and cycling.

Commute response:

The applicant does not own all of the land subject to the Sunfield FTAA application, the Masterplan has shown the preferred outcome for the Sunfield Loop road through neighbouring properties under different ownership.

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The Engineering Drawings have however shown there will be the ability for turnaround at the terminus of any roads where the loop road cannot be connected.

1.15 ITEM 2.6.2 – PUBLIC ROADS

Request:

It is also unclear from the scheme plans and transport assessment exactly what roads are proposed to be vested as public roads. It is requested that a specific scheme plan be provided that clearly indicates all roads and accessways to be vested.

Commute response:

The Sunfield Scheme Plan document lodged with the substantive application indicates which parcels of land are to vest as Public Roads and which are to remain in private ownership.

1.16 ITEM 2.6.3 – LOOP ROAD CONSTRUCTION

Request:

Indicate when the loop road will be built in relation to when the proposal will require this to be functional.

Commute response:

The loop road will be constructed in stages as the development progresses.

1.17 ITEM 2.6.4 – MANAGEMENT OF PARKING

Request:

Provide detailed information on how exactly parking will be managed on internal roads, especially given wide berms and wide road reserves.

Commute response:

Please see the response in Item 2.3.1.

1.18 ITEM 2.6.5 – FLUSH MEDIAN

Request:

Clarify why a flush median is proposed on the internal roads if the trip generation rate assumed is very low.

Commute response:

Flush medians are proposed as a safety measure to allow refuge for turning vehicles especially in the industrial areas and to provide flexibility in detailed design.

1.19 ITEM 2.6.6 – LOOP ROAD REQUIREMENTS

Request:

Clarify why the proposed bus lane within the Sunfield 'loop' is required if the trip generation rate assumed is very low.

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Commute response:

The trip generation is low due to the provision of the Sunbus, which is considered to require a separated bus lane for efficiency and safety.

1.20 ITEM 2.6.7 – TRIP GENERATION

Request:

The bus lane also includes 'car parking' – this should be clarified.

Commute response:

For clarity parking is not proposed in the bus lanes.

1.21 ITEM 2.6.8 – EAST-WEST LINKS

Request:

Comment on the future volume of the east-west links through the site with wider future growth and how this could affect the proposal.

Commute response:

The east-west links are largely to service the internal requirements of Sunfield given rural land predominates to the east of the development. With the subsequent inclusion of the Mill Road corridor on the eastern boundary of the proposed development this will preclude any further east west links being considered. This is being reviewed with revised Mill Road modelling / design.

1.22 ITEM 2.6.9 – LOS LEVELS

Request:

The ITA states that movements at several intersections are expected to operate at a Level of Service (LOS) F, which is not considered acceptable particularly when it affects the through movement on a busy arterial road. It is recommended that the performance of any intersections that are assessed to operate at a LOS F should be remodelled with appropriate mitigation to ensure the intersection can operate within capacity.

Commute response:

Having LOS levels at F for single movements at intersections in peak hours is very common throughout Auckland. It is noted however that the modelling is being revised as noted previously.

1.23 ITEM 2.7.1 – INTERSECTION MITIGATION

Request:

A safe systems approach needs to be used by the Applicant in their internal road design, external upgrades, and effects on the wider road network. In this regard, AT considers that the Applicant needs to fully investigate the effects of their development on the safety of the adjacent road network and further investigate what interventions are required on the network to ensure safety based on the increase in trips. For instance, traffic calming adjacent roads, pedestrian crossings on adjacent roads, separating walking and cycling facilities, etc.

Commute response:

The safety of users has been considered in the road design / type (eg separate bus lanes, separated cycling lanes, flush medians), provision of signalised intersections with priority crossings. This will be refined at the detailed design stage.

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1.24 ITEM 2.7.2 – LOOP ROAD SAFETY

Request:

The Applicant also needs to assess the road safety elements of the internal loop road and how pedestrians can safely cross this wide road reserve including how they can safely cross the proposed bus lane.

Commute response:

This is a detailed design issue however the crossings are generally via signalised crossing points as shown in the Engineering Design drawings.

1.25 ITEM 2.8.1 – TRAVEL DEMAND

Request:

More reliance and information on travel demand management plans are recommended for each component of the employment component. This should include further conditions on travel demand management plans and also provide draft travel demand management plans for AT's review.

Commute response:

A Draft Travel Demand Management Plan has been developed for the site. Proposed condition 130 outline travel plan requirements.

The applicant is happy to provide a draft travel demand management plan for review.

1.26 ITEM 2.8.2 – TRAVEL DEMAND ENFORCEMENT

Request:

The Applicant should also comment on who will be responsible for enforcing and travel demand management plan(s).

Commute response:

As per proposed condition 130, a travel plan for the Employment Precinct is required to be provided for each business prior to occupation of the building. This is to be submitted and approved by Council. It will therefore be the responsibility of the employer to uphold the travel plan and have their own internal policies and procedures for managing compliance. Given this is a proposed condition of consent, it will ultimately be enforced by Council.

1.27 ITEM 2.8.3 – CONDITION 128

Request:

The proposed Travel Plan in draft Condition 128 promotes measures to reduce reliance on private vehicle use. This is not considered sufficient to ensure the significant reduction in car use anticipated by the development. It is recommended that all employment and industrial activities include comprehensive and robust measures to ensure the modal share and peak time truck bans are adhered too. This could be in the form of conditions imposed on the resource consents.

Commute response:

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Proposed condition 130 relates to employment and industrial activities, which requires maximising other forms of transport and promoting vehicle movements for warehouse distribution to off-peak hours.

1.28 ITEM 2.9.1 – EARTHWORKS

Request:

Provide more details on construction and earthwork traffic which include the proposed numbers of trucks and their routes.

Commute response:

Given the request to have flexibility around delivery staging it is difficult to provide the level of detail requested. It is considered that the draft management plans provided with the submitted application, and the respective proposed conditions regarding updated management plans being submitted, provides an appropriate level of detail for the proposal (which is in line with standard practice).

1.29 ITEM 2.9.2 – HEAVY VEHICLE ROUTES

Request:

Identify whether the routes to be used by the heavy vehicles can withstand the proposed heavy vehicle trips and what mitigation is proposed to prevent damage to the roads.

Commute response:

As with the response to 2.9.1, given the request to have flexibility around delivery staging it is difficult to provide the level of detail requested. However, the applicant would expect that the level of service of existing roads would be adequate to provide safe access to land in areas of growth. It is considered that the draft management plans provided with the submitted application, and the respective proposed conditions regarding updated management plans being submitted, provides and appropriate level of detail for the proposal which is in line with standard practice.

1.30 ITEM 2.9.3 – PAVEMENT

Request:

A pavement impact assessment condition should be provided.

Commute response:

Not considered a traffic engineering issue (pavement being a roading engineering issues).

It is unclear which pavement is in question here. However, if there is an assessment required of any existing pavements then the applicant would expect this is a function carried out by the applicable roading authority.

1.31 ITEM 2.10.1 – CAR PARKNIG ENFORCEMENT

Request:

We are concerned that the low provision of car parking may lead to problems for accessing the site, including for emergency services. This issue has been encountered in the adjacent "Addison" subdivision and is discussed in Auckland Council's research report "Living in Addison: An investigation into the lived experience of a master planned housing development in Auckland", November 20191. It is recommended that the Applicant identify how the issues identified in Council's review of the Addison development will be avoided for the Sunfield development.

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Commute response:

The design of all private and public access will allow for the unrestricted passage of emergency services. The minimum pavement formation is 6m in width.

As per the response in 2.3.1, there are several mechanisms proposed that will ensure that adequate, safe access is provisioned for.

1.32 ITEM 2.10.2 – FIRE ACCESS

Request:

The ITA states that a house could be up to 135m from fire truck access. It is recommended that FENZ and other emergency responders such as Hato Hone St John provide input to confirm compliance and practicality.

Commute response:

FENZ regulations have been addressed as part of the initial submission. As with response to 2.10.1, adequate access will be ensured.

The applicant is happy to liaise with medical providers to confirm any access requirements.

1.33 ITEM 2.10.3 – PC79

Request:

No assessment against the Plan Change 79 standards has been provided with regards to the clear legal and physical width requirements for emergency access where pedestrian-only access is provided.

Commute response:

See the covering summary table regarding Plan Change 79.

1.34 ITEM 2.10.4 – TRAFFICABLE LANEWAYS

Request:

More information is needed on the usage of the trafficable laneways. The Masterplan documents suggest that vehicles can access most laneways including emergency services and moving trucks. The ITA suggests that servicing and loading is limited to the service hubs. If the 6m trafficable lanes are open to vehicles, what measures will be in place to ensure households do not use the lanes to access and park closer to their house. If obstructions are proposed to limit vehicle access, for example bollards, how will access be enabled for emergency services and moving trucks?

Commute response:

Please refer to the response in 2.3.1 and Figure 10-4 of the ITA (repeated below)

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With the car-less design proposed, the lanes around the residential dwellings will not be required to cater for typical residential traffic. Rather the residents that have a car will park in areas around "hubs" and walk to their dwelling. As a result, the laneways will only need to cater for weekly rubbish collection and emergency access (fire / ambulance). Figure 10-4 shows a typical residential hub arrangement.

1.35 ITEM 2.10.5 – SERVICE HUBS

Request:

There is limited information on the proposed 'neighbourhood service hubs' that will cater for rubbish trucks and loading vehicles which are proposed to be located within 75m of each dwelling. No dimensions or vehicle tracking has been provided to show heavy vehicles can safely manoeuvre into and out of the hubs. In addition, the practicalities of moving furniture and other heavy items up to 75m from the service hub has not been addressed. Further, it is unclear how these hubs will be managed, particularly to ensure they are not used for parking for residents or visitors cars.

Commute response:

The applicant will provide vehicle tracking curves with the detailed design EPA level drawings.

The applicant has liaised with Rubbish Direct and confirmed the proposed private accessway layouts are amenable to smaller private sector rubbish collection.

Please refer to the response in 2.3.1 which addresses how parking restrictions will be managed.

Yours sincerely

Commute Transportation Consultants

Leo Hills

Director