

17th February 2025

Attn: Sunfield Expert Panel
c/o Environmental Protection Agency (EPA)

Response to Minute 25 – Comments on Draft Conditions (Section 70 of FTAA)

The below table provides an overview of the comments from the Applicant on the draft conditions distributed on 11 February 2026, attached to Minute 25 from the Panel. **Attachment A** provides the Applicant's feedback in a 'tracked change' version of the draft set of conditions, using the version attached to Minute 25 as the baseline document.

This memorandum and the draft conditions contained in **Attachment A** have focussed on the matters outlined in paragraphs [5] to [7] of Minute 25, noting:

- The list of plans and technical documents in Condition 3 have been updated and checked. The approach to updating Condition 3 was to list documentation that outlined the scope and parameters of the proposal, including mitigation measures. Aspects such as peer reviews, statutory assessments e.g. PC120, case studies and detailed responses to comments from invited parties were not listed in Condition 3.
- The lot numbers throughout the document have been checked and updated, including condition [193A]. In many instances, it was considered that more general terminology could be used which would ensure clarity, whilst not creating possible errors due to the number of lots impacted. Some lot numbers were also not identified on the basis that confirmation as to whether particular lots are to be vested is still to be determined.
- The cross referencing of the conditions has been checked and updated as required. It is noted that conditions [46] to [63] regarding groundwater monitoring have been updated with appropriate cross references to reflect that these respective conditions are dependent on the findings of condition [45A].

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- The text highlighted yellow has been reviewed and confirmed where necessary, however it is recognised that there are some highlights which remain, as these relate to an Auckland Council monitoring fee and Auckland Council reference numbers for the respective consents. The monitoring fee has been left blank, but it is noted that a \$3,000 monitoring fee appears to have been used for other Fast-track approvals, noting that monitoring charges will be on-going as the development proceeds.

The above, which address paragraph [848] of the draft decision, have not been referenced in the below table, however, comments are made within **Attachment A** to outline some of the changes. The below table focusses on the matters raised within paragraphs [843], [845], [846], [849], and [850] of the draft decision.

A meeting was held with Auckland Council and Auckland Transport on the 16th February 2026 to discuss the transport related conditions, primarily conditions [114], [120], [123] and [127]. The outcomes of this meeting are outlined in the below table.

The references in the below table are cross referenced to the respective paragraph in the Panel’s draft decision.

Applicant Comments			
Ref.	Condition	Feedback / Direction	Applicant Response
[843](d)	[19]	The Panel requested additions to the Construction Management Plan (CMP)	The condition has been updated accordingly.
[849]26 and [850]	[27AB]	The Panel has incorporated a new Drainage Management Plan (DMP) condition which addresses the farm drains to the north.	The Applicant accepts the intent of the condition put forward by the Panel, however, has made amendments to the proposed condition as contained within Attachment A to ensure greater certainty and clarity of scope, referencing the particular properties to the north of Sunfield.
[843](b)	[32]	The Panel requested the purpose and certification requirements of the Waste Management Plan (WMP) be provided in the condition.	The condition has been updated accordingly.
[843](a)	[46]	The Panel requested objectives be added to the Groundwater and Settlement Monitoring and Contingency Plan (GSMCP).	Objectives have been added.
[843](e)	[90]	The Panel requested changes to the Lizard Management Plan (LMP) to avoid repetition.	The condition has been updated accordingly.

[843](f)	[92A]	The Panel queried the reference of a Native Fish Capture and Relocation Plan as opposed to a Native Fish Management Plan (NFMP)	This was an error in referencing, with the condition being updated to incorporate the correct terminology, being a NFMP.
[843](c)	[95E]	The Panel requested objectives be added to the Fish Passage Monitoring and Maintenance Plan (FPMMP).	Objectives have been added.
[849]7	[110-112]	The Panel have invited comment on AT's proposed condition (f) regarding leasing land on the Employment Precinct. <i>'There shall be no carparking provided for residential uses formally or informally in the employment precinct unless otherwise agreed to by the Council in writing.'</i>	This condition is accepted by the Applicant, and has been incorporated as condition [110B].
[846](a)	[112A] and [112B]	Conditions regarding a parking maximum for office activities of 1 space per 300m ² of GFA and warehousing activities of 1 space per 500m ² of GFA within the Employment Precinct.	<p>The Applicant has provided an assessment from Commute regarding these conditions at Attachment B. Attachments C and D are also provided, which contain letters from Mike Bayley (Bayley Corporation Limited) and Chris Meehan (Winton Land Limited) respectively, outlining the real world challenges of securing tenants to lease these spaces, and in turn the viability of the Employment Precinct.</p> <p>On top of the design philosophies of the overall Masterplan and a reduction on the reliance of motor vehicles with homes being accessible to the Employment Precinct on foot, active modes and public transport (Sunbus), the consent conditions, when considered in the round, adequately control traffic generation from the Employment Precinct.</p> <p>This includes condition 112C which requires parking surveys to be undertaken within the surrounding streets to see if parking overflow occurs as a result of unanticipated traffic generation. It is noted that the Applicant largely accepts the condition as worded by Mr Harries.</p>

			<p>Condition 114 and the Public Transport (Sunbus) Operational and Implementation Plan (PTOIP) will ensure an efficient and effective public transport system.</p> <p>Whilst conditions [112A] and [112B] are very clear, they are also a little blunt for a large integrated and masterplanned development, with a range of land-use and activity types interacting with one another. Condition 123A is a traffic monitoring condition, which measures the performance of the network at various trigger points, including the intersections in the wider area not initially being upgraded and the public transport system.</p> <p>Conditions 112C, 114, and 123A ultimately require a baseline measurement, provide clear objectives and on-going monitoring, and stipulate that mitigation is required if certain triggers / criteria are not met. This may or may not include parking restrictions at that time.</p> <p>I note that the Applicant is also accepting of the amendments to condition [130] and the Travel (Demand Management) Plan which give it 'more teeth', as recommended by Mr Harries.</p> <p>Notwithstanding the above, as outlined within the Commute memorandum (Attachment B), the Applicant considers that market standard ratios should be used, being 1 parking space per 30m² of GFA for offices, and 1 parking space per 250m² of GFA for warehouse / industrial. The conditions within Attachment A are updated to this effect.</p>
[846](b) and [849]9	[112C]	Parking Monitoring to occur in neighbouring streets, with the Panel preferring the condition of Mr Harries.	The Applicant accepts the condition of Mr Harries, with some minor recommendations to ensure clarity.
[846](c)	[112D]	The requirement of an ITA should the parking ratios of conditions 110, 111, 112, 112A or 112B be exceeded.	This condition is not supported, as it is effectively a double up of the condition 112C which requires an ITA and mitigation measures if certain thresholds are met

			<p>following the parking survey. Condition 112C is also to be read in conjunction with condition 114 and 123A with the traffic environment being considered holistically. These above mentioned conditions also trigger the requirement of an ITA and consideration of mitigation measures due to an effect on the environment, not the exceedance of a required parking ratio which may cause no effect.</p> <p>The current condition also appears difficult to implement and monitor as it does not stipulate what is to be done if the road network cannot accommodate the travel demand, or factor in the nuance of timing.</p>
[849]10	[114]	The Public Transport Operations and Implementation Plan (PTOIP). The Panel invites AT and the Applicant to liaise with an aim of agreeing this condition.	<p>The Applicant and AT met to discuss the condition. The condition has been updated to reflect the Applicants preference; this is to provide a dedicated Sunfield transport service to preserve the efficiency of a rapid transit link to the local rail stations. Council's preference is to allow the general public access to the Sunbus service along the proposed route which the Applicant believes will compromise the efficiency and integrity of the service.</p> <p>AT outlined that a further standalone condition is proposed which will detail requirements and expectations for the upgrades to the Takanini and Papakura Train Stations. This condition has not been reviewed, and feedback will be provided by the Applicant in the final review of conditions.</p>
[849]11	[120]	The Panel invites AT and the Applicant to liaise to gain mutual understanding, with intersection D and E proposed by the Applicant. Auckland Transport have queried the required upgrades for intersections D, E and F.	The Applicant and AT met to discuss this matter, with this being considered an oversight from AT. It was agreed that the Applicant's proposal for intersections D, E and F is clear, and that no amendments to the condition is required.
[849]13	[123]	The Panel invites AT and the Applicant to liaise to gain mutual understanding, with intersection D and E proposed by the	The Applicant and AT met to discuss this matter, with this being considered an oversight from AT. It was agreed that the Applicant's proposal for intersections D, E and F is

		Applicant, and the requirement for Intersection F. Auckland Transport have queried the required upgrades for intersections D, E and F.	clear, and that no amendments to the condition is required.
[846](d)	[123] and [176]	The requirement to upgrade the cycleway and footpath along Cosgrave Road to Airfield Road, as opposed to Walters Road.	The Applicant has accepted this change and has amended the table to clarify that both 1a <u>and 1b</u> are required to be provided.
[846](d)	[123] and [176]	<i>'Upgrade, in consultation with AT, the southern side of Airfield Road from the northern-most corner of the site to the northwestern corner of 139 Airfield Road.'</i> <u>Trigger</u> <i>'Prior to the occupation of any businesses within the Employment Precinct.'</i>	The Applicant has accepted this requirement, however, has added line item 2 to the table, which is consistent and marries up to the Plan referenced and illustrated in the condition.
[846](d)	[123] and [176]	<i>'Develop and agree with AT a level of service plan for the Sunbus that addresses bus numbers and frequencies in relation to levels of demand to ensure that at all stages of development, bus travel remains the most convenient and attractive travel option.'</i> <u>Trigger</u> <i>'To be developed and active prior to 890 dwellings being constructed.'</i>	The Applicant is not supportive of this additional line item as it has the potential to cause inconsistency and uncertainty, with condition 114 providing the basis of the public transport requirements.
[846](e) and [849]12	[123A]	Trip Generation Monitoring 1. Additional stage for monitoring as recommended by Mr Harries. 2. Auckland Transport have recommended changes which, in particular, increase the number of triggers and frequency for when monitoring is undertaken. The Panel has invited the applicant to comment on this proposed condition.	Mr Harries suggested an additional stage for monitoring within this condition, which was incorporated into the applicant's condition set of 19 th December, with a trigger of 2,700 residential dwellings being added. Both conditions aim to follow a sequential structure to ensure monitoring and implementation is easier, largely being: 1. Outlining the requirement of the applicant to provide an ITA at certain trigger points. 2. Outlining the purpose of the ITA to assess the traffic generation and public transport system recognising the two are linked.

			<ol style="list-style-type: none"> 3. Outlining the assessment to be undertaken and requirements of the ITA. 4. Outlining the intervention thresholds (degree of saturation and Level of Service). 5. Outlining that mitigation measures are required and provides examples of possible considerations, and sets expectations as to when these should occur. 6. The advice note also references other conditions to acknowledge the that the traffic network is to be considered holistically. <p>Below is the condition put forward by AT with the applicant's comments in red.</p> <p>All practicable measures must be undertaken to ensure that the trip generation rate of the Sunfield development does not exceed 1100 peak hour vehicle trips. The consent holder must in consultation with the road controlling authority install infrastructure that effectively measures all vehicle trips entering or exiting the Sunfield development. [This appears to require on-going monitoring with traffic counts at certain locations, noting this would include construction traffic which would form a large part of vehicle movements – this is not supported as part of the condition, with the triggers below being more appropriate]</p> <p>The consent holder must provide an integrated transportation assessment (ITA), prepared by a SQEP approved by the Council [the inclusion of preparation from a SQEP is supported, although having them approved by Council is not preferred], to Council for certification no later than 8 weeks after any of the following triggers:</p> <ul style="list-style-type: none"> • At every interval of 445 dwelling occupied (inclusive of dwellings in any retirement village); or [Following a meeting with AT, it was outlined that monitoring could occur at intervals of 900 dwellings, effectively monitoring at 900; 1,800; 2,700; and 3,600 dwellings being occupied – The applicant agrees to these triggers, on the basis of monitoring infrastructure not being required] • Whenever the applicant has identified that a single week's (weekday only) average peak hour vehicle trip generation rate is or was on average more than 1100; or
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			<p>[This is presumably based on the monitoring infrastructure, which appears the same as bullet point three and a potential double up]</p> <ul style="list-style-type: none"> • Upon request from Council based on Council's review of the trip generation rate ascertained from the trip measuring infrastructure provided at the access points to Sunfield a single week's average (weekday only) peak hour trip generation rate is or was more than 1100 on average. <p>[This is not supported, and it is considered that the four trigger points are appropriate and provide the necessary coverage. Additionally, it must be recognised that the infrastructure upgrades are linked to traffic modelling of 3,000vph therefore impacts on the network are unlikely to be seen until the second half of the development when at least two ITA's have been generated.]</p> <p>The purpose of the ITA(s) is to:</p> <ul style="list-style-type: none"> • Determine whether the traffic generation associated with the Sunfield development is in accordance with the submitted ITA (1,100 vph for Sunfield in its entirety), • Determine the uptake and effectiveness of the public transport system as required by condition 114. • Identify measures required to reduce the trip generation of the development below 1100 peak hour vehicle trips. [This is only considered if thresholds are met] • Assess whether the methods identified have been successful in reducing the trip generation of the development below 1100 peak hour vehicle trips. <p>[This is only considered if thresholds are met and if methods have been utilised over and above those in the ITA, or is this the same as bullet point 1. It is a little unclear]</p> <ul style="list-style-type: none"> • Conclude whether any further occupation of dwellings must be ceased to ensure that the trip generation rate does not exceed 1100 peak hour vehicle trips. [This is jumping to expected outcomes and mitigation measures and is not considered the purpose of the ITA, noting this part of the condition is not supported] <p>To achieve the purpose of the ITA, at a minimum assessment of the following will be required:</p> <p>A. Assessment of all relevant intersections affected by the development including measurement of their performance, degree of saturation and level of service for the following intersections:</p> <ul style="list-style-type: none"> • Ranfurly Road / Alfriston Road roundabout • Walters Road / Porchester Road roundabout • Porchester Road / Kuaka Drive traffic signals
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			<p><i>management plans would be in place which have the possibility of distorting the overall use of the network. Given that construction traffic was not included in the modelling, this is not comparing like for like, recognising the assessment required and the effect on the environment, is based on the degree of saturation and Level of Service, not trip generation]</i></p> <p>Whilst the conditions are reasonably similar in intent, the Applicant's condition is preferred. Following discussion with AT, the Applicant has amended the triggers of the condition with ITAs having to be prepared prior to the occupation of 900; 1,800; 2,700; and 3,600 residential dwellings. There are, however, three areas of key disagreement being:</p> <ul style="list-style-type: none"> • The requirement of traffic monitoring infrastructure for continuous monitoring seems excessive given the four triggers put forward and that this doesn't correlate to an effect. • The ceasing of development if trip generation triggers from the monitoring infrastructure are exceeded, again noting trip generation doesn't necessarily equate to an effect on the network. • Construction traffic should not be referenced, noting the modelling undertaken did not include construction traffic given it is a temporary activity recognising the multiple stages of development in different parts of a very large site.
[846](f)	[130]	The Panel have suggested changes to the Travel (Demand Management) Plan, as per the recommendations of Mr Harries.	The Applicant has accepted these changes.
[849]11	[120]	The Panel invites AT and the Applicant to liaise to gain mutual understanding, with intersection D and E proposed by the Applicant. Auckland Transport have queried the required upgrades for intersections D, E and F.	The Applicant and AT met to discuss this matter, with this being considered an oversight from AT. It was agreed that the Applicant's proposal for intersections D, E and F is clear, and that no amendments to the condition is required.

[849]13	[123]	The Panel invites AT and the Applicant to liaise to gain mutual understanding, with intersection D and E proposed by the Applicant, and the requirement for Intersection F. Auckland Transport have queried the required upgrades for intersections D, E and F.	The Applicant and AT met to discuss this matter, with this being considered an oversight from AT. It was agreed that the Applicant's proposal for intersections D, E and F is clear, and that no amendments to the condition is required.
[849]15	[127]	Proximity to the nearest Local Hub. The Panel invites AT and the Applicant to liaise with an aim of agreeing this condition.	The Applicant and AT met to discuss the condition. Minor amendments to the condition have been agreed as contained within Attachment A .
[845]	[145] to [149]	The Panel raised a query regarding duplication of conditions [33] and [147] and the requirement of a pre-commencement meeting.	This matter has been reviewed, and a new condition [145] is proposed to cross reference conditions [18], [19], and [33 to 35], with conditions [146 to 149] proposed to be deleted.
[849]25A	<i>Advice Notes</i>	The Panel invites the Applicant to comment on the Advice Notes recommended by AT.	<p>The advice notes put forward by AT are helpful, however, they do appear quite detailed. Given the duration of the consent, and length of time taken to complete the development, it is considered that the advice notes could be shortened significantly to capture the key point, so further investigation can occur at the time of construction or when the approval is required. For example:</p> <p>Corridor Access Requirements</p> <p><i>The consent holder will need to obtain a Corridor Access Request approval from the road controlling authority for any proposed works in, or occupation of, in the existing road reserve.</i></p> <p>Encroachment Licences</p> <p><i>Encroachment Licences will be required for any proposed private infrastructure within the public legal road corridor e.g. bus stops, bus shelters.</i></p> <p>Works that require a Resolution</p>

			<p><i>Permanent traffic controls such as but not limited to and parking controls, bus stops, or intersections are subject to a Resolution approval from Auckland Transport. The resolutions, prepared by a qualified traffic engineer, will need to be approved so that the changes to the existing legal road reserve can be legally implemented and enforced.</i></p> <p>Hamlin Road Stopping</p> <p><i>The consent holder has proposed works that require the permanent removal of legal road status from a portion of land (Hamlin Road). Under the Local Government Act 1974 and Auckland Transport’s statutory responsibilities as the Road Controlling Authority, any road stopping must follow the prescribed legal process. The consent holder cannot undertake works that remove or obstruct legal road without formal road stopping approval.</i></p> <p>Note these have not been added to the conditions set contained in Attachment A.</p>
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Yours faithfully,



Ian Smallburn – Planning Consultant, Tattico Limited