
MINUTE 2 OF THE EXPERT PANEL

Invitation to comment
Sunfield [FTAA-2503-1039]

7 July 2025

- [1] This minute addresses invitations to comment on the application under section 53 of the Fast-track Approvals Act 2025 (the Act).
- [2] The Expert Panel (**Panel**) records that it undertook a site visit on Wednesday, 2 July 2025. The Panel confirms that it undertook its site visit prior to finalising the invitations to comment on this application.
- [3] In accordance with section 53(2) of the Act, the Expert Panel must invite comments from persons listed in sections 53(2) (a) to (n), where relevant. The Panel records that sections 53(2)(d) to (g) are not relevant to this application. **Appendix 1** provides the list of prescribed persons relevant to this project.
- [4] Auckland Council has been identified as the relevant local authority pursuant to section 53(2)(a) of the Act. For completeness, the Expert Panel invites comments from all relevant parts of Auckland Council and relevant Council Controlled Organisations including (but not limited to) Watercare Services Limited, Healthy Waters, and Auckland Transport.
- [1] Section 53(2)(h) and (i) state that the owners and occupiers of land to which the substantive application relates, and the land adjacent to that land, must be invited to comment. The Application included an appendix (*Appendix 47: Details of Each Landowner Adjacent to Sunfield*) that identified the names and addresses of owners and occupiers of the land that the Applicant considered to be adjacent to

the site. The EPA has also provided its advice to the Panel based on the Guidance Note entitled: *FTA Guidance Material Identifying Adjacent Land*.

[5] The word “adjacent” is not defined in the Act. Nor has it been the subject of judicial consideration under the Act. And so, the meaning of “adjacent” must be ascertained from its text, and in the light of its purpose and its context.¹

[6] “Adjacent” is defined in the Cambridge dictionary as meaning “*very near, next to, or touching, and in the Merriam Webster as meaning “not distant”*”. Therefore, “adjacent” connotes “nearness”, but does not require a thing (land in this instance) to be physically adjoining. Rather, for land to be “adjacent”, it must be adjoining or nearby.

[7] It is comparatively easy to identify land that is adjoining. That is land that is touching and shares a common boundary. It is more difficulty to identify land that is “nearby”.

[8] And so, what is meant by “nearby”? That will necessarily be informed by the context within which the word is used. Here, the context is informed by the purpose of the Act, as set out in section 3:

The purpose of this Act is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.

[9] Relevantly here, the focus of the purpose of the Act is the *facilitation* of the *delivery* of development projects with significant regional or national benefits. The use of the words “facilitation” and “delivery” in this purpose support an interpretation of “nearby” that is relatively constrained.

[10] Section 10 is also of assistance. It sets out the procedural principles that

¹ Legislation Act 2019, s 10.

apply to persons performing functions and duties and exercising powers under the Act. Relevant here are the requirements to take all practicable steps to use timely, efficient, consistent, and cost-effective processes that are proportionate to the functions, duties, or powers being performed or exercised.

[11] The context also includes the context of the project itself, and the application's site. Here, there is land nearby the application site separated only by a public road. The Panel considers that land to be adjacent to the application site.

[12] The panel has also identified some land that that is separated from the application site by a reserve, or a reserve and a road. The Panel considers that that land is also adjacent to the application site. The owners and occupiers of that land will be invited to comment, accordingly.

[13] The list of land parcels whose owners and occupiers will be invited to comment pursuant to section 53(2)(h) and (i) of the Act is included in **Appendix 2**.

[14] Under section 53(3) of the Act, the Panel also has discretion to invite comments from any other person the panel considers appropriate. Whilst the discretion is broadly framed, the Panel must exercise its discretion in a principled way. The Panel has considered the following matters when deciding whether to invite other parties to provide comments:

- a. the purpose of the Act and the procedural principles set out in section 10;
- b. any relevant aspect of the public or community interest that requires consideration, including Treaty interests and tikanga;
- c. the comprehensiveness and quality of the applicant's technical information and how the applicant has addressed the issue of consultation;

- d. the likely extent of local authority participation in the application process;
- e. whether the activity would otherwise be prohibited under relevant legislation; and
- f. whether the application is likely to involve novel or contentious legal or disputed factual issues

[15] Having considered these matters, the Panel has identified the following other persons from whom it invites comments:

- a. New Zealand Transport Agency | Waka Kotahi (**NZTA**)
- b. Papakura Marae
- c. Greencare Aviation Limited

NZTA

[16] By letter dated 25 June 2025, NZTA wrote to the Panel advising that a notice or requirement was given to Auckland Council on 13 June 2025 for the Takanini section of the Mill Road Project. The notice of requirement includes land on the application site. In its letter, NZTA requested that it be invited to comment on the application to enable the transportation effects of the development and its interface with the Takanini section of the Mill Road Project to be adequately considered.

[17] The Panel considers that, in this context, NZTA represents a relevant part of the public interest that requires consideration, and so invites comment from NZTA.

Papakura Marae

[2] Papakura Marae is an urban marae for the Takanini, Papakura, Ardmore, and Drury areas. The Panel considers that the Marae represents a relevant part of the community interest, and invites comment from the Marae.

Greencare Aviation Limited

- [18] Greencare Aviation Limited jointly owns Ardmore Airport, together with Ardmore Airport Limited. Ardmore Airport Limited is the requiring authority with respect to Designation 200 under the Auckland Unitary Plan. Ardmore Airport Limited is invited to comment pursuant to section 53(2)(l) of the Act. The Panel considers that Greencare Aviation Limited, the joint owner of the land parcel on which the Ardmore Airport is situated should also be invited to comment on the basis that it too represents a relevant part of the public interest that requires consideration, and does so accordingly.

897 Alpha Limited and Shu-Cheng Chen

- [19] By letter dated 3 June 2025, the solicitor for 897 Alpha Limited and Shu-Cheng Chen wrote to the EPA requesting that her clients be invited to make comments on the Application.
- [20] 897 Alpha Limited and Shu-Cheng Chen own the land situated at 897 Papakura Clevedon Road, and 382 Airfield Road.
- [21] The land at 897 Papakura Clevedon Road has already been identified as adjacent land in Appendix 2, and so the owners and occupiers of that land will be invited to make comments on the Application.
- [22] The land situated at 382 Airfield Road has not been identified as adjacent land and so the owners of that land parcel will only be invited to make comments if the Panel exercises its discretion and invites them to do so pursuant to section 53(3) of the Act.
- [23] The panel declines to exercise its discretion to invite comments from the owners of 382 Airfield Road. It does so for the following reasons, and

records for completeness that it viewed this site when undertaking its site visit:

- a. It does not consider that the land situated at 382 is sufficiently “nearby” the application site to be considered “adjacent” to it.
- b. It does not consider the site to be within the context of the site on the basis that it is within the same stormwater catchment. Flood plain, nor that it is within the area of roading upgrades that the Application has identified as being required by the Proposal;
- c. None of the matters identified at paragraph [15] support inviting comments; and
- d. Inviting comments would not be consistent with the purpose of the Act, nor the procedural requirements set out in section 10 of the Act.

[24] The invitation to comment is dated 7 July 2025 and the due date for comments is 20 working days after this date (section 54 of the Act), namely, **4 August 2025**.

[25] Comments must be filed with the EPA no later than **11:59pm on 4 August 2025** via:

- a. email to substantive@fasttrack.govt.nz;
- b. by post to Private Bag 63002, Wellington 6140 New Zealand; or
- c. in person to Stewart Dawson's Corner, 366 Lambton Quay, Wellington 6011



Philip Maw

Sunfield Expert Panel Chair

Appendix 1 – Parties invited to Comment under section 53(2) of the Act

53(2)(a) relevant local authorities

53(2)(a)	Relevant local authorities	<ol style="list-style-type: none"> 1. Auckland Council (which includes Watercare Services Limited, Healthy Waters, and Auckland Transport).
53(2)(b)	Relevant iwi authorities	<ol style="list-style-type: none"> 2. Ngāti Tamaoho Settlement Trust 3. Te Ākitai Waiohua Waka Taua Inc 4. Ngāi Tai ki Tāmaki Trust 5. Ngāti Maru Rūnanga Trust 6. Ngāti Paoa Iwi Trust 7. Ngāti Tamaterā Settlement Trust 8. Ngaati Whanaunga Incorporated Society 9. Ngaati Whanaunga Ruunanga Trust 10. Hako Tūpuna Trust 11. Ngāti Te Ata Claims Support Whānau Trust 12. Te Whakakitenga o Waikato Limited
53(2)(c)	<p>any relevant Treaty settlement entities, including, to avoid doubt,—</p> <p>(i) an entity that has an interest under a Treaty settlement within the area to which the substantive application relates; and</p> <p>(ii) an entity operating in a collective arrangement, provided for under a Treaty settlement, that relates to that area</p>	<ol style="list-style-type: none"> 13. Ngāti Tamaoho Settlement Trust 14. Ngāi Tai ki Tāmaki Trust 15. Tūpuna Taonga o Tāmaki Makaurau Trust/Whenua Haumi Roroa o Tāmaki Makaurau Limited Partnership 16. Te Ākitai Waiohua Settlement Trust 17. Ngāti Paoa Iwi Trust 18. Ngāti Maru Rūnanga Trust 19. Ngāti Tamaterā Settlement Trust 20. Ngaati Whanaunga Ruunanga Trust 21. Hako Tūpuna Trust 22. Taonga o Marutūāhu Trustee Limited/Marutūāhu Rōpū Limited Partnership 23. Te Whakakitenga o Waikato Incorporated

		<p>24. Ngāti Te Ata Claims Support Whānau Trust</p> <p>25. Ngāti Koheriki Claims Committee</p>
53(2)(d)	any protected customary rights groups and customary marine title groups whose protected customary rights area or customary marine title is within the area to which the substantive application relates	N/A
53(2)(e)	any applicant group under the Marine and Coastal Area (Takutai Moana) Act 2011 that is identified in the report prepared under section 18 or 49 and seeks recognition of customary marine title or protected customary rights within the area to which the substantive application relates	N/A
53(2)(f)	ngā hapū o Ngāti Porou if the area to which the substantive application relates is within or adjacent to, or the activities to which it relates would directly affect, ngā rohe moana o ngā hapū o Ngāti Porou	N/A
53(2)(g)	the tangata whenua of any area within the area to which the substantive application relates that is a taiāpure-local fishery, a mātaihai reserve, or an area that is subject to bylaws or regulations made under Part 9 of	N/A

	the Fisheries Act 1996	
53(2)(h)	the owners of the land to which the substantive application relates and the land adjacent to that land	See Appendix 2
53(2)(i)	the occupiers of the land to which the substantive application relates and the land adjacent to that land unless, after reasonable inquiry, an occupier cannot be identified	See Appendix 2
53(2)(j)	the Minister for the Environment and other relevant portfolio Ministers	<ul style="list-style-type: none"> 26. Minister of Housing 27. Minister for Infrastructure 28. Minister for Auckland 29. Minister of Education 30. Minister for Treaty of Waitangi Negotiations 31. Minister for Social Development and Employment 32. Minister for Conservation 33. Minister for Building and Construction 34. Minister for the Environment 35. Minister for Regional Development 36. Minister for Seniors
53(2)(k)	relevant administering agencies	<ul style="list-style-type: none"> 37. Auckland Council 38. Ministry for Environment
53(2)(l)	any requiring authority that has a designation on land to which the substantive application relates or on land adjacent to that land	<ul style="list-style-type: none"> 39. Auckland Council 40. First Gas Limited 41. Ardmore Airport Ltd
53(2)(m)	<p>if the approvals sought in the substantive application include—</p> <p>(i) an approval described in section 42(4)(a) or (d) (resource consent or designation), the</p>	42. Director-General of Conservation

	<p>persons and groups listed in clause 13 of Schedule 5:</p> <p>(ii) an approval described in section 42(4)(e) (concession), the persons listed in clause 5 of Schedule 6:</p> <p>(iii) an approval described in section 42(4)(g) (conservation covenant), the persons listed in clause 44 of Schedule 6:</p> <p>(iv) an approval described in section 42(4)(h) (wildlife approval), the persons listed in clause 4 of Schedule 7:</p> <p>(v) an approval described in section 42(4)(k) (marine consent), the persons listed in clause 5 of Schedule 10:</p> <p>(vi) an approval described in section 42(4)(l) or (m) (access arrangement), the persons listed in clause 5 of Schedule 11</p> <p>(vii) an approval described in section 42(4)(n) (mining permit), the person listed in clause 18 of Schedule 11.</p>	
53(2)(n)	any persons or groups specified by the Minister under section 27(3)(b)(iii)	N/A

Appendix 2 – Land parcels whose owners and/or occupiers are invited to comment

Legal appellations are used where no address is known				
119A Cosgrave Road, Papakura	121A Cosgrave Road, Papakura	123 Cosgrave Road, Papakura	101 Cosgrave Road, Papakura	103 Cosgrave Road, Papakura
119 Cosgrave Road, Papakura	131 Cosgrave Road, Papakura	143 Cosgrave Road, Papakura	279 Airfield Road, Papakura	526 Mill Road, Papakura
143 Hamlin Road, Papakura	2 Village Way, Papakura	269 Airfield Road, Papakura	196 Old Wairoa Road, Papakura	323 Airfield Road, Papakura
53 Cosgrave Road, Papakura	347 Airfield Road, Papakura	125 Hamlin Road, Papakura	20 Village Way, Papakura	22 Village Way, Papakura
18 Pukeroa Place, Papakura	24 Village Way, Papakura	26 Village Way, Papakura	22 Pukeroa Place, Papakura	28 Pukeroa Place, Papakura
1/36 Pukeroa Place, Papakura	2/36 Pukeroa Place, Papakura	Airfield Road - Lot 2 DP 109061	4 Village Way, Papakura	196A Old Wairoa Road, Papakura
155 Hamlin Road, Papakura	135 Hamlin Road, Papakura	99 Corsair Lane, Ardmere	42A Pukeroa Place, Papakura	2/42 Pukeroa Place, Papakura
48 Pukeroa Place, Papakura	54 Pukeroa Place, Papakura	6 Village Way, Papakura	60 Pukeroa Place, Papakura	62 Pukeroa Place, Papakura
31 Pukeroa Place, Papakura	29 Pukeroa Place, Papakura	27 Pukeroa Place, Papakura	8 Village Way, Papakura	Pukeroa Park - Lot 48 DP 76159
10 Village Way, Papakura	12 Village Way, Papakura	14 Village Way, Papakura	16 Village Way, Papakura	18 Village Way, Papakura
321 Airfield Road, Papakura	897 Papakura-Clevedon Road, Papakura	95 Hamlin Road, Papakura	115 Hamlin Road, Papakura	237 Airfield Road, Papakura
105 Bellbird Street, Papakura	328 Airfield Road, Papakura	205 Old Wairoa Road, Papakura	521 Old Wairoa Road, Papakura	2 Taiaha Street, Papakura
32 Hoia Street, Papakura	50 Hoia Street, Papakura	70 Survila Street, Papakura	35 Wellfield Drive, Papakura	20 Taiaha Street, Papakura
12b Bliss Court, Takanini	52 Survila Street, Papakura	539 Mill Road, Papakura	12a Bliss Court, Takanini	12 Bliss Court, Takanini

30 Hoia Street, Papakura	10a Bliss Court, Takanini	10b Bliss Court, Takanini	33 Wellfield Drive, Papakura	22 Taiaha Street, Papakura
48 Survila Street, Papakura	50 Survila Street, Papakura	31 Wellfield Drive, Papakura	24 Taiaha Street, Papakura	28 Hoia Street, Papakura
507 Old Wairoa Road, Papakura	499 Old Wairoa Road, Papakura	501 Old Wairoa Road, Papakura	503 Old Wairoa Road, Papakura	505 Old Wairoa Road, Papakura
46 Survila Street, Papakura	509 Old Wairoa Road, Papakura	511 Old Wairoa Road, Papakura	26 Taiaha Street, Papakura	26 Hoia Street, Papakura
65 Okawa Avenue, Papakura	24 Hoia Street, Papakura	44 Survila Street, Papakura	22 Hoia Street, Papakura	42 Survila Street, Papakura
2 Minhas Road, Papakura	67 Okawa Avenue, Papakura	30 Ancroft Street, Papakura	20 Hoia Street, Papakura	40 Survila Street, Papakura
207 Old Wairoa Road, Papakura	18 Hoia Street, Papakura	38 Survila Street, Papakura	16 Hoia Street, Papakura	14 Hoia Street, Papakura
68 Survila Street, Papakura	519 Old Wairoa Road, Papakura	4 Taiaha Street, Papakura	20a Survila Street, Papakura	48 Hoia Street, Papakura
13 Ancroft Street, Papakura	16a Bliss Court, Takanini	519 Mill Road, Papakura	11 Sapwood Crescent, Takanini	12 Hoia Street, Papakura
36 Survila Street, Papakura	13 Sapwood Crescent, Takanini	10 Hoia Street, Papakura	15 Sapwood Crescent, Takanini	8 Hoia Street, Papakura
21 Sapwood Crescent, Takanini	17 Sapwood Crescent, Takanini	6 Hoia Street, Papakura	34 Survila Street, Papakura	2 Hoia Street, Papakura
30 Survila Street, Papakura	4 Hoia Street, Papakura	32 Survila Street, Papakura	23 Sapwood Crescent, Takanini	31 Sapwood Crescent, Takanini
508 Old Wairoa Road, Papakura	85 Hamlin Road, Papakura	101 Cosgrave Road, Papakura	80 Hamlin Road, Papakura	55 Cosgrave Road, Papakura
209 Old Wairoa Road, Papakura	25 Sapwood Crescent, Takanini	27 Sapwood Crescent, Takanini	29 Sapwood Crescent, Takanini	12b Bliss Court, Takanini

46 Hoia Street, Papakura	497 Old Wairoa Road, Papakura	517 Old Wairoa Road, Papakura	6 Taiaha Street, Papakura	35 Sapwood Crescent, Takanini
39 Sapwood Crescent, Takanini	66 Survila Street, Papakura	529 Mill Road, Papakura	33 Sapwood Crescent, Takanini	26 Survila Street, Papakura
56 Cosgrave Road, Papakura	28 Survila Street, Papakura	54 Cosgrave Road, Papakura	41 Sapwood Crescent, Takanini	58 Cosgrave Road, Papakura
45 Sapwood Crescent, Takanini	43 Sapwood Crescent, Takanini	24 Survila Street, Papakura	112 Bellbird Street, Papakura	49 Sapwood Crescent, Takanini
18 Survila Street, Papakura	60 Cosgrave Road, Papakura	47 Sapwood Crescent, Takanini	62 Cosgrave Road, Papakura	53 Sapwood Crescent, Takanini
14 Survila Street, Papakura	64 Cosgrave Road, Papakura	51 Sapwood Crescent, Takanini	16 Survila Street, Papakura	515 Old Wairoa Road, Papakura
8 Taiaha Street, Papakura	84 Cosgrave Road, Papakura	211 Old Wairoa Road, Papakura	41 Pakaraka Drive, Papakura	64 Survila Street, Papakura
55 Sapwood Crescent, Takanini	10a Bliss Court, Takanini	22a Survila Street, Papakura	44 Hoia Street, Papakura	61 Sapwood Crescent, Takanini
63 Sapwood Crescent, Takanini	12 Survila Street, Papakura	57 Sapwood Crescent, Takanini	10 Survila Street, Papakura	69 Sapwood Crescent, Takanini
308 Airfield Road, Papakura	14 Bliss Court, Takanini	65 Sapwood Crescent, Takanini	67 Sapwood Crescent, Takanini	42 Hoia Street, Papakura
62 Survila Street, Papakura	213 Old Wairoa Road, Papakura	513 Old Wairoa Road, Papakura	10 Taiaha Street, Papakura	12 Taiaha Street, Papakura
40 Hoia Street, Papakura	19 Sapwood Crescent, Takanini	37 Sapwood Crescent, Takanini	215 Old Wairoa Road, Papakura	14 Taiaha Street, Papakura
38 Hoia Street, Papakura	60 Survila Street, Papakura	32 Pakaraka Drive, Papakura	217 Old Wairoa Road, Papakura	16 Taiaha Street, Papakura

36 Hoia Street, Papakura	58 Survila Street, Papakura	2 Charles Henry Way, Papakura	219 Old Wairoa Road, Papakura	34 Hoia Street, Papakura
54 Survila Street, Papakura	56 Survila Street, Papakura	221 Old Wairoa Road, Papakura	18 Taiaha Street, Papakura	2 Tumu Road, Papakura
1 Tumu Road, Papakura	280 Airfield Road, Papakura	52 Cosgrave Road, Takanini	28 Ancroft Street, Papakura	7 Sapwood Crescent, Takanini
30 Pukeroa Place, Papakura	34 Pukeroa Place, Papakura	3 Pukeroa Place, Papakura	4 Pukeroa Place, Papakura	197 Old Wairoa Road, Papakura
4 Bliss Court, Takanini	6 Bliss Court, Takanini	8 Bliss Court, Takanini	10 Bliss Court, Takanini	10A Bliss Court, Takanini
360 Airfield Road, Papakura				