

29 January 2026

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

New and Amended National Instruments

On 18 December 2025, the Government introduced three new national instruments and amended seven existing national instruments, all of which came into force on 15 January 2026. In accordance with paragraphs 7 and 8 of Minute 22 from the Expert Panel, the below provides an assessment of these national instruments in the context of the Sunfield proposal. Whilst not specifically assessing the new and updated national instruments, the original application and previously submitted information address many of the themes and associated effects, with the below assessment to be read in conjunction with this information.

1. Resource Management (National Environmental Standards for Detached Minor Residential Units) Regulations 2025 (NES-DMRU)

1.1 Summary

The NES-DMRU introduces new standards for building detached minor residential units (commonly known as granny flats), with an internal floor area of up to 70m², without the need for resource consent. This may occur when certain requirements are met regarding building coverage, setbacks from boundaries and the distance of the detached minor residential unit from the principal residential unit. This NES complements recent changes to the Building Act 2004.

1.2 Assessment

The Sunfield application does not contain any 'minor dwellings', with only 'principal dwellings' being proposed. Accordingly, minor dwellings have not been applied for as a reason for consent. Therefore, the NES-DMRU is not relevant to the subject Sunfield Fast-track application.

2. National Policy Statement for Natural Hazards 2025 (NPS-NH)

2.1 Summary

The NPS-NH has been introduced to create national direction on managing natural hazard risk while the new planning and environmental management system (RMA Reform) is being developed and implemented. As outlined within the Ministry for the Environment factsheet¹ regarding the NPS-NH:

‘National reviews and recent severe weather events have shown that the current resource management system is not being used effectively to manage natural hazard risk. Development continues to occur in areas that are exposed to natural hazards and inappropriately risk-averse approaches to natural hazards can prevent much-needed new development.’

The only natural hazards that the NPS-NH applies to are flooding, landslips, coastal erosion, coastal inundation, active faults, liquefaction and tsunamis.

The Objective of the NPS-NH, as outlined at part 2.1, states:

‘Natural hazard risk to people and property associated with subdivision use and development is managed using a risk-based proportionate approach.’

Policy 1 (section 2.2) of the NPS-NH requires a risk assessment to be undertaken for new developments using a standard methodology. The subsequent policies require the proposed development response to be proportionate to the level of risk, and to consider the impact on neighbouring sites. Policies also outline that decisions must be based on the best available information and consider the potential impacts of climate change.

Section 3 of the NPS-NH outlines the implementation matters to be undertaken to give effect to the objectives and policies of the NPS-NH, particularly the development of a specific risk-based assessment.

2.2 Assessment

In accordance with Policy 1, Maven Associates have undertaken a risk-based assessment for the proposed Sunfield development regarding flooding and landslips. This is supplementary information to previously submitted information, and this assessment is contained in **Appendix A**.

¹ Updating National Direction: New National Policy Statement for Natural Hazards – Page 1, ‘Context’

2.2.1 Flooding

Given the scale of the development, this risk assessment breaks the Sunfield development down into six respective 'zones' which factor in the proposed land-use and the flood management strategy. This risk assessment is in accordance with Part 3 of the NPS-NH. The assessment is summarised below:

	Zone A: Residential Precincts	Zone B: Commercial, Industrial and Educational Precincts	Zone C: Road Network, Swales and Overland Flow Paths	Zone D: Stormwater Reserves and Dual Use Areas	Zone E: Downstream Properties (Papakura Stream Catchment)	Zone F: Downstream Properties (Pahurehure Catchment)
Likelihood	Rare	Rare	Possible	Almost Certain	Possible	Possible
Consequence	Moderate	Moderate	Negligible	Negligible	Negligible	Negligible
Risk Level	Low	Low	Low	Low	Low	Low

When considering the development as a whole, it is considered that the risk level resulting from the Sunfield development is **low**.

Based on this information, the following assessment against the policies of the NPS-NH has been undertaken.

Policy Number	Policy	Comment
1	When considering natural hazard risk associated with subdivision, use or development, the risk level must be assessed using the risk matrix.	An assessment of the flood hazard risk level has been undertaken by Maven Associates, which is contained within Appendix A . It is considered that the risk level associated with the Sunfield proposal from flooding is low .
2	Natural hazard risk associated with subdivision, use and development must be managed using an approach that is proportionate to the level of natural hazard risk.	The proposed Sunfield development manages the flooding hazard in a proportionate manner with the proposed stormwater management solutions, including stormwater channels and basins, being of an appropriate scale and design to mitigate stormwater and flooding effects and enabling the land to be appropriately developed. It should be noted that the proposed Sunfield stormwater strategy has been peer reviewed by two suitably qualified independent parties.

3	Where subdivision, use or development is assessed as having very high natural hazard risk, that risk must be avoided.	The risk associated with the proposed development and natural flooding hazard is not deemed to be 'very high'.
4	Where subdivision, use or development, including any associated mitigation measures, will create or increase significant natural hazard risk on other sites, that risk must be avoided or mitigated using an approach that is proportionate to the level of natural hazard risk.	<p>As outlined within the original application and previously submitted information the stormwater within the eastern catchment will discharge downstream (to the north) in a manner consistent with the existing scenario. Stormwater modelling indicates there is no increase in flooding downstream in terms of either peak flow, frequency, or duration.</p> <p>The modelling confirms for the entire Sunfield development there will be no additional flood risk to downstream properties. This is considered to be a proportionate response to the level of the natural hazard risk.</p>
5	Natural hazard risk assessment and decisions must be based on the best available information and must be made even when that information is uncertain or incomplete.	<p>It is considered that there is adequate information regarding stormwater and flooding effects, with significant information, including stormwater modelling, contained within the subject application and technical reports.</p> <p>The proposed Sunfield stormwater strategy has been peer reviewed by two suitably qualified independent parties.</p>
6	The potential impacts of climate change to at least 100 years into the future must be considered.	It is confirmed that climate change has been factored into the risk assessment (and previously submitted technical reports) with a conservative allowance for climate change, as per the Auckland Council Stormwater Code of Practice.

It is therefore considered that the Sunfield proposal meets the policies and over-arching objective of the NPS-NH, as outlined within the previous assessments, as the risks associated with flooding from the proposed Sunfield development can be appropriately managed, with the proposed mitigation measures being proportionate to the potential effects.

2.2.2 Landslips

Based on Auckland Council 'Geomaps', the shallow landslide susceptibility classification within the Sunfield development is predominantly 'very low' with a pocket of 'low' and 'moderate' classifications in the south-eastern corner of the site, as illustrated in **Figure 1** below. The pocket of land in the south-eastern corner is where the land rises with the majority of this land containing the Wai Mauri stream park. Therefore, based on the proposed land-use activity in this area, the proposed geotechnical conditions of consent and the generally low classification of the natural hazard, the resulting risk level is **low**.

Based on the above, it is considered that the proposal meets the policies of the NPS-NH regarding landslips, as the approach taken is proportionate to the natural hazard, and there will be no impacts on neighbouring sites or property.

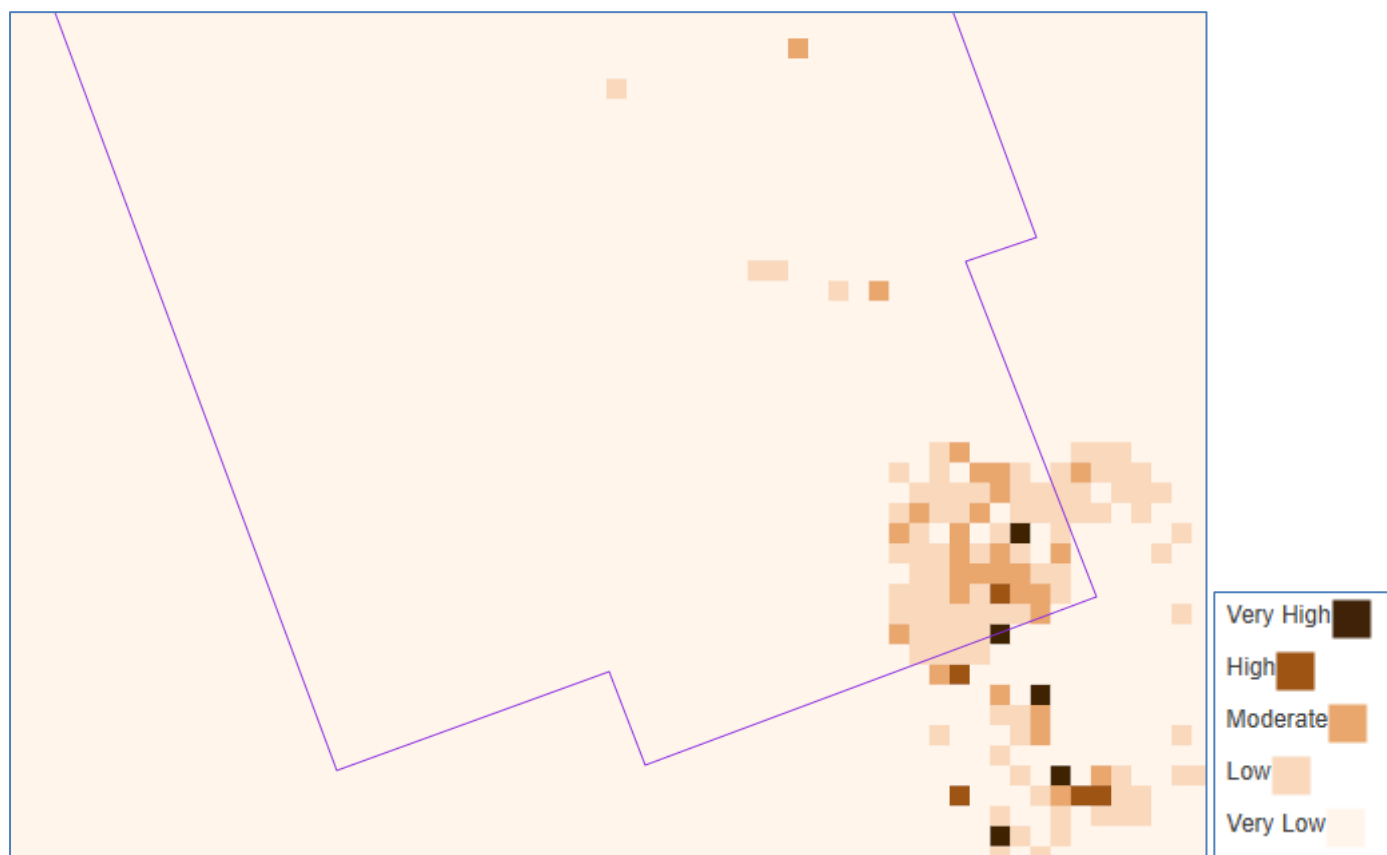


Figure 1: Shallow Landslide Susceptibility 2025 Analysis (Source: Auckland Council Geomaps)

3. National Policy Statement for Infrastructure 2025 (NPS-I)

3.1 Summary

The new NPS-I has been introduced to enable the efficient development and management of infrastructure. As outlined within the Ministry for the Environment factsheet² regarding the NPS-I:

‘The NPS-I requires decision-makers to recognise infrastructure as a matter of national significance under the RMA and provides policy to support its development, maintenance and upgrades while still addressing adverse impacts. Over time, it will support more consistent, coordinated planning and development of infrastructure that meets community needs and supports long-term planning and resilience from climate change.’

² Updating National Direction: New National Policy Statement for Infrastructure – Page 1, ‘Context’

The NPS-I applies to all decisions made under the RMA affecting the operation, maintenance, renewal and upgrade of existing infrastructure, as well as to the development of new infrastructure, with the exception of renewable electricity generation activities and the electricity transmission network.

The Objective of the NPS-I, as outlined at part 2.1, states:

The objective of this National Policy Statement is to:

- a. ensure the national, regional and local benefits of infrastructure are provided for;*
- b. enable infrastructure to support the social, economic and cultural wellbeing of people and communities and their health and safety;*
- c. enable infrastructure to support the development and change of urban and rural environments to meet the diverse and changing needs of present and future generations;*
- d. ensure infrastructure is well-functioning, resilient and compatible, as far as practicable, with other activities; and*
- e. ensure infrastructure is delivered in a timely and efficient manner while managing adverse effects from or on infrastructure.*

There are 11 detailed policies within the NPS-I, with an assessment of the Sunfield proposal against these provided below in section 3.2 of this memo.

3.2 Assessment

The 11 detailed policies are outlined below, with the assessment considering all relevant types of infrastructure activities and supporting activities associated with the Sunfield proposal, particularly those relating to the wastewater, water supply, stormwater and roading.

Policy Number	Policy	Comment
1	Providing for the benefits of infrastructure <ol style="list-style-type: none"> Decision-makers must ensure that the national, regional or local benefits of infrastructure, relative to any localised adverse effects on the environment, are recognised and provided for. Decision-makers must recognise that the benefits of infrastructure include: 	The proposed infrastructure upgrades associated with the Sunfield development will create significant regional benefits and allow for the creation of a well-functioning masterplanned urban environment, with the benefits having been outlined previously, primarily:

	<ul style="list-style-type: none"> a. providing for the social, cultural and economic wellbeing of present and future generations; b. creating, supporting and enhancing well-functioning urban and rural environments; c. supporting sufficient development capacity to meet demand for housing and business land; d. providing services that are essential to support human life and the development, growth and functioning of districts, regions, New Zealand and the economy; e. helping to protect and restore the natural environment; f. supporting New Zealand's emissions reduction targets and mitigating the effects of climate change; and g. reducing the risks from, and improving resilience to, natural hazards and climate change. <p>3. Decision-makers must recognise:</p> <ul style="list-style-type: none"> a. the significant risks to, and impacts on, public safety, the wellbeing of people and communities, and the environment that may occur when infrastructure services are compromised; and b. that infrastructure networks can be both independent and interconnected. 	<ul style="list-style-type: none"> a. A total economic impact on business activity within Auckland to 2044 estimated to be around 3.1 billion (Net Present Value). b. Around 24,000 full time equivalents employed over the development period to 2044. c. The creation of 3,854 much needed healthy homes in the southern Auckland market. d. The stormwater solution will provide areas of attractive public space and ecological benefits, and has factored in the potential impacts of climate change. e. Sunfield will provide a sustainable and environmentally friendly 15-minute neighbourhood, meeting the needs of communities with Sunfield considering all aspects of life and integrates housing, employment opportunities, amenity and open space to enable neighbourhoods to become more self-sufficient. f. Sunfield is a significant development which supports development capacity to meet the demand for housing and business land. g. The proposal promotes a reduction in greenhouse gases through: <ul style="list-style-type: none"> • The employment area, healthcare, schools, open spaces and local services all being easily accessible by walking, cycling and public transport. • Prioritising clean and affordable energy. The energy requirements of Sunfield will mostly be filled with onsite solar power and energy storage solutions throughout the community. • Low emission vehicles are promoted with community transport in Sunfield being provided by the Sunbus autonomous electric vehicle shuttle fleet. • A proposal and layout which substantially restrict private vehicle usage.
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		<ul style="list-style-type: none"> • A significant amount of planting is also proposed within the open space network. <p>The localised adverse effects are considered to be appropriately managed and mitigated through the proposed design of the masterplan and engineering solutions, and the proposed conditions of the consent.</p>
2	<p>Operational need or functional need of infrastructure to be in particular locations and environments</p> <ol style="list-style-type: none"> 1. Decision-makers must recognise that infrastructure may have an operational need or functional need to operate in, be located in, or traverse particular locations and environments. 2. Decision-makers must recognise that the operational need or functional need of infrastructure includes, but is not limited to, the need to: <ol style="list-style-type: none"> a. provide services to people and communities in a timely, effective and efficient manner; b. operate effectively and efficiently as linear and/or interconnected infrastructure networks within and across district and regional boundaries; c. access or connect to particular natural or physical resources, including other infrastructure; d. be accessible so infrastructure activities can be undertaken effectively and efficiently; e. locate where the services are required, including in areas at risk to natural hazards, whether the infrastructure has been spatially identified in advance; and f. manage risks from natural hazards. 	<ol style="list-style-type: none"> 1. The location of the proposed infrastructure has been considered based on the existing environmental context and the location of existing infrastructure. This has been factored into the design of the masterplan and the engineering solutions. For example, the stormwater catchments will be altered post development to better manage the existing flood risk downstream of Sunfield, which in turn impacts the locations of the stormwater ponds and channels. Likewise, Hamlin Road has been realigned to create a new intersection at Cosgrave Road / Walters Road / Hamlin Road which will create a more efficient and safer traffic environment. The proposed Sunfield stormwater strategy has been peer reviewed by two suitably qualified independent parties. 2. There is a functional need for the proposed linear infrastructure to connect to existing infrastructure within the regional and district boundaries. This will ensure that the solutions for stormwater, wastewater, water supply and roading are integrated and efficient. This includes natural and physical resources such as Awakeri Wetlands Stage 1, McLennan Dam, the Southern Interceptor and the surrounding road network. Conditions are proposed which will ensure that infrastructure is provided in an integrated and timely manner e.g. proposed conditions 27C, 117, 120 and 123.
3	<p>Considering spatial planning</p> <ol style="list-style-type: none"> 1. Decision-makers must: 	<p>The Future Development Strategy (2023) has been previously assessed, with it being concluded that the</p>

	<ul style="list-style-type: none"> a. have regard to the extent to which the infrastructure has been identified within a strategic planning document, while recognising that not all infrastructure can be spatially identified in advance; and b. consider relevant spatial plans and master plans prepared by the infrastructure provider and provided to the decision-maker. 	<p>deferral of this area being acceptable for urban growth is largely a financially driven decision, not a planning one, with this greenfield area being a logical location for urban growth, which is even more compelling given the recently announced alignment of the proposed Mill Road - Stage 2 corridor.</p> <p>As outlined within the original application and subsequent information, the identified infrastructure prerequisites for this area are being progressed (Mill Road and Takanini Frequent Transit Network). The applicant has also outlined its intention to fund all of the required infrastructure upgrades to enable Sunfield.</p>
4	<p>Enabling the efficient and timely operation and delivery of infrastructure activities</p> <p>1. Decision-makers must:</p> <ul style="list-style-type: none"> a. enable the efficient and timely delivery of infrastructure activities; b. enable cross-boundary infrastructure networks; c. provide flexibility for infrastructure providers to use new or innovative technologies and methods to improve the delivery of infrastructure services and/or improve environmental outcomes; d. enable opportunities to make more effective use of existing infrastructure; e. consider opportunities for continuous improvement in service delivery and environmental outcomes when renewing or replacing resource consents; and f. enable the upgrading of infrastructure where this will: <ul style="list-style-type: none"> i. improve the resilience of infrastructure to the risks from natural hazards and effects of climate change; 	<p>With regard to policy 4.1c, it is noted that decision makers must provide flexibility for new and innovative technologies and methods to improve the delivery of infrastructure services. It is proposed to utilise a low pressure sewer (LPS) for the wastewater system within the Sunfield development. This technology is considered to be fit for purpose and appropriate for the subject site and will significantly reduce wastewater flows from the development.</p> <p>In line with policy 4.1d, the proposal will make more effective use of existing infrastructure which will include an extension of the Awakeri Wetlands and the passive recreational opportunities for the community, as well as upgrading roading intersections, roading frontages with pedestrian and cycleway access, and better utilisation of the rail network through the Sunbus connections to Papakura and Takanini Rail Stations.</p>

	<ul style="list-style-type: none"> ii. maintain or improve its level of infrastructure service, including to meet increasing demand; or iii. improve environmental outcomes. <p>2. Decision-makers must:</p> <ul style="list-style-type: none"> a. recognise it is the role of the infrastructure provider to identify the preferred location for the infrastructure activity; and b. have regard to existing information and assessments undertaken by the infrastructure provider, including, but not limited to, information prepared using the Better Business Cases methodology developed by The Treasury New Zealand, infrastructure strategies prepared under the Local Government Act 2002, or the Infrastructure Priorities Programme developed by New Zealand Infrastructure Commission Te Waihanga 	
5	<p>Recognising and providing for infrastructure supporting activities</p> <p>1. Decision-makers must recognise and provide for the role of infrastructure supporting activities, including by:</p> <ul style="list-style-type: none"> a. recognising the importance of infrastructure supporting activities to enable the benefits of infrastructure activities to be realised; b. recognising the operational need or functional need of some infrastructure supporting activities, including supporting quarrying activities to operate in, be located in, or traverse particular environments and locations; and c. enabling the timely delivery of infrastructure supporting activities. 	There are not considered to be any infrastructure supporting activities associated with the subject proposal.
6	<p>Recognising and providing for Māori interests</p>	As outlined within the original application and previously submitted information, extensive engagement has been

	<p>1. Decision-makers must recognise and provide for Māori interests in relation to infrastructure activities and infrastructure supporting activities, including by:</p> <ul style="list-style-type: none"> a. taking into account the outcome of any engagement with tangata whenua on any relevant resource consent, notice of requirement, or request for a private plan change; b. recognising the opportunities tangata whenua may have in developing and operating their own infrastructure at any scale or in partnership; and c. local authorities: <ul style="list-style-type: none"> i. providing opportunities for tangata whenua involvement where infrastructure and infrastructure supporting activities may affect a site of significance or issue of cultural significance to Māori; and ii. operating in a way that is consistent with any relevant iwi participation legislation or Mana Whakahono ā Rohe. 	<p>undertaken with Mana Whenua. The overall design of the Sunfield Masterplan has incorporated feedback from Mana Whenua into the proposal, particularly Wai Mauri Stream Park, with iwi being very supportive of Sunfield, recognising the sustainable principles and practices underpinning the development.</p> <p>Proposed conditions (88 and 89) have also been put forward regarding on-going mana whenua consultation throughout the development of Sunfield.</p>
7.	<p>Assessing and managing the effects of proposed infrastructure activities</p> <p>1. When assessing and managing the effects of infrastructure activities, decision-makers must:</p> <ul style="list-style-type: none"> a. have regard to the extent to which adverse effects have been avoided, remedied or mitigated through the selection of the route, site or method of undertaking the work; b. consider the technical and operational requirements and constraints of infrastructure activities; c. take into account the extent to which the effects of the infrastructure activities are different in scale, intensity, duration and 	<p>The effects associated with the proposed infrastructure have been assessed in detail within the original application and previously submitted information. To summarise, it is considered that any adverse effects will be appropriately managed and mitigated through the proposed engineering solution, design of the masterplan and proposed conditions.</p>

	<p>frequency from the effects of existing infrastructure;</p> <p>d. take into account relevant international standards (that are recognised or used in New Zealand), national standards and recognised best practice standards and methodologies to assess and manage adverse effects; and</p> <p>e. ensure that the mitigation measures and consent conditions are proportionate to the scale of adverse effects generated by the activity.</p>	
8	<p>Operation, maintenance and minor upgrade of existing infrastructure</p> <p>1. Decision-makers must enable the efficient operation and maintenance and minor upgrade of existing infrastructure, provided that, where practicable, adverse effects are avoided, remedied or mitigated.</p>	As per Policy 7, any adverse effects will be appropriately managed and mitigated, noting the proposal predominantly relates to new infrastructure.
9	<p>Managing the effects of new infrastructure and major upgrades</p> <p>1. Decision-makers must enable new infrastructure or major upgrades of existing infrastructure activities in all environments.</p> <p>2. Where infrastructure activities are proposed to locate in or are likely to have adverse effects on environments and values provided for in section 6 of the Act, the provisions of this policy must be read alongside other relevant national direction, regional policy statements and regional and district plans.</p> <p>3. Where (2) does not apply, the adverse effects of new infrastructure and major upgrades must be, where practicable, avoided, remedied or mitigated.</p>	As per Policy 7, any adverse effects will be appropriately managed and mitigated.
10	<p>Planning for and managing the interface and compatibility of infrastructure with other activities</p> <p>1. Decision-makers on planning instruments must manage the interface between existing and</p>	This application is a Fast-track application (under the Fast-track Approvals Act 2024), which is not deemed to be a planning instrument, meaning this policy is not applicable.

	<p>planned infrastructure and other activities to ensure:</p> <ul style="list-style-type: none"> a. infrastructure and other activities are as compatible as practicable; b. the safe, efficient and effective operation, maintenance and minor upgrades, and major upgrades of existing or planned infrastructure are not compromised by the adverse effects of other activities; and c. infrastructure activities that are compatible with each other are co-located, while recognising that some types of infrastructure are not compatible. <p>2. Decision-makers on planning instruments must:</p> <ul style="list-style-type: none"> a. engage with infrastructure providers to: <ul style="list-style-type: none"> i. understand their existing and planned infrastructure activities and medium to long-term plans; ii. identify appropriate buffers and other methods to protect existing and planned infrastructure from the adverse effects of new or intensified sensitive and incompatible activities, including direct effects, reverse sensitivity effects, and risks to health and safety; iii. support the strategic integration of infrastructure with land use activities; b. identify: <ul style="list-style-type: none"> i. activities that are particularly sensitive to the effects of infrastructure; ii. activities that are compatible with infrastructure, or potentially compatible with appropriate buffers, design standards or mitigation measures; 	
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	<ul style="list-style-type: none"> iii. infrastructure activities that are sensitive to the effects of other infrastructure; c. apply a range of methods, including, where appropriate: <ul style="list-style-type: none"> i. the use of buffers in plans to manage sensitive activities, including new or intensified sensitive activities, and incompatible activities near infrastructure; ii. design standards to manage the effects of infrastructure on other activities; iii. special purpose zoning and other spatial-planning layers; and d. ensure that measures to avoid, remedy or mitigate the effects of other activities on infrastructure are consistent with relevant international standards (that are recognised or used in New Zealand), national standards and recognised best practice standards and methodologies. 	
11	<p>Assessing and managing the interface between infrastructure and other activities</p> <p>1. When assessing and managing the interface between existing and planned infrastructure with other activities, including new or intensified sensitive activities, through planning instruments, decision-makers must:</p> <ul style="list-style-type: none"> a. recognise that noise, vibration, dust and visual effects are all typical effects associated with infrastructure activities that can be managed where practicable but not completely avoided; b. recognise that: <ul style="list-style-type: none"> i. amenity values change due to a range of factors; ii. changes in amenity values from infrastructure activities can be 	<p>This application is a Fast-track application (under the Fast-track Approvals Act 2024), which is not deemed to be a planning instrument, meaning this policy is not applicable.</p>

	<p>necessary to achieve well-functioning urban and rural environments; and</p> <p>c. apply the general principle that the primary responsibility for managing adverse effects is on the new activity (including infrastructure) while allowing flexibility for site- and project-specific circumstances.</p>	
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Given the above assessment, it is considered that the proposal is consistent with the objectives and policies of the NPS-I as the infrastructure associated with Sunfield will ensure that the regional benefits are realised, which in turn will support the social, economic and cultural wellbeing of people and communities now and in the future. Any adverse effects associated with the proposed infrastructure will be appropriately managed and mitigated, which includes through the use of the proposed Sunfield conditions of consent.

4. National Policy Statement for Highly Productive Land Amendment 2025 (NPS-HPL)

4.1 Summary

The amendments to the NPS-HPL seek to allow more greenfield areas to be developed, including on Land Use Capability Class 3 land (LUC 3).

As outlined within the Ministry for the Environment factsheet³ regarding Land Use Capability:

Land Use Capability (LUC) is a classification system that ranks land based on its physical characteristics and limitations to determine its suitability for different types of use, such as cropping, horticulture and grazing. LUC 3 land has moderate limitations that restrict the range of crops and intensity of use, but it is still suitable for arable farming, horticulture and pastoral grazing. It is considered productive land, though less versatile than LUC 1 and LUC 2 land.

New clause 3.5(7)(b)(iii) states that until a regional policy statement containing maps of highly productive land in the region is operative (noting that mapping of highly productive land is not contained within the Auckland Regional Policy Statement) land that is *subject to a resource consent application for subdivision, use or development on LUC 3 land for any activity other than rural lifestyle, where that consent has been lodged at or after the commencement date (17 October 2022)* is not considered highly productive land.

³ Updating National Direction: Changes to the National Policy Statement on Highly Productive Land – Footnote 1, Page 1, 'Context'

4.2 Assessment

The soil classification for the respective land has previously been assessed within the original application and previously submitted information. Agfirst have provided a memorandum attached as **Appendix B**, which considers the NPS-HPL amendments. **Figure 2** below illustrates the current respective LUC classifications for the applicable land, noting the NPS-HPL does not apply to the Future Urban Zone land in the southern portion of Sunfield.

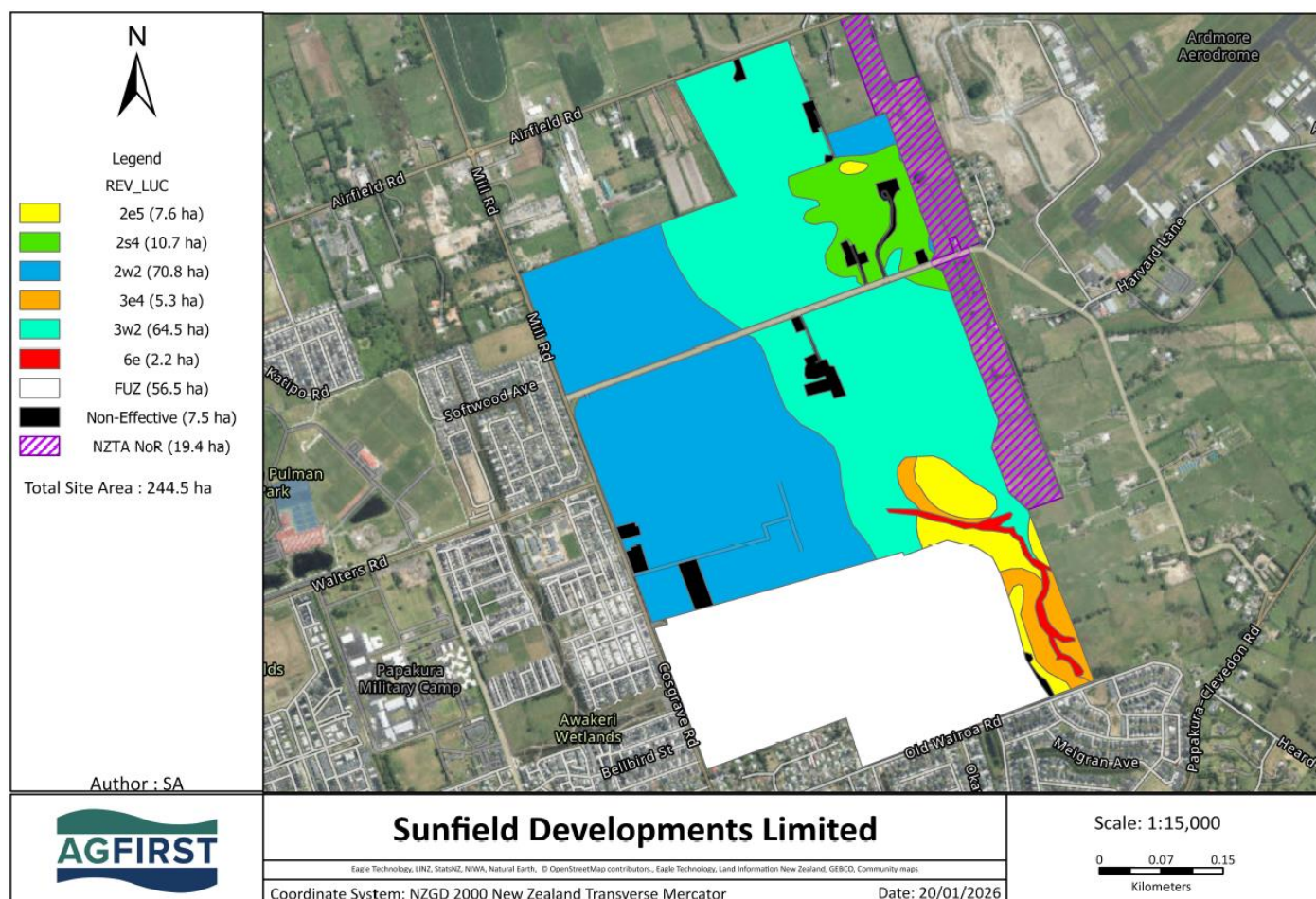


Figure 2: LUC Mapping for Sunfield Site (Source: Agfirst)

As can be seen from Figure 1, LUC 3 land is located in a large contiguous portion of the site (teal and orange shading), and when amalgamated with the other non-highly productive land (LUC 6e) the area equates to 72ha, or 43%, of the 168.6ha pertinent area (Sunfield land excluding the Future Urban Zone land and the Notice of Requirement for Mill Road – Stage 2 land). LUC 3 land is no longer classed as highly productive land given the new clause 3.5(7)(b)(iii) of the NPS-HPL with this application being lodged after 17 October 2022.

Ultimately, as per the original application and previously submitted information, when looking at the land in detail, the land subject to this proposal is generally land not of high production value given the heavy clay soil textures, and wetness limitations. Urbanisation is therefore considered appropriate, with the effects associated with a loss of productive land

being mitigated by an alternative, more appropriate land-use. The proposed location of Mill Road – Stage 2 further increases the logic of this area being developed into an urban area, with the corridor providing a clear and obvious edge between urban and rural activities.

The removal of LUC 3 land fragments the highly productive land further and limits the opportunity for amalgamation of highly productive land on the site with other surrounding highly productive land, particularly given the urban areas to the west and south, the proposed alignment of Mill Road - Stage 2 to the east, and Ardmore Airport with associated urban development further to the east.

The amendments to the NPS-HPL, therefore, strengthens the alignment of the Sunfield proposal with this national policy statement and the proposed urbanisation and subdivision of the land can be progressed as Clause 3.10 of the NPS-HPL remains satisfied.

5. New Zealand Coastal Policy Statement Amendment 2025 (NZCPS)

5.1 Summary

Changes to the New Zealand Coastal Policy Statement (NZCPS) aim to streamline consenting for infrastructure, renewable electricity generation and transmission, aquaculture, and mineral extraction activities in coastal areas, with these ‘priority activities’ having elevated consideration in decision-making through amendments to policy 6 of the NZCPS.

5.2 Assessment

These amendments to the NZCPS do not impact the proposal, with no new infrastructure proposed to be located within the coastal environment.

6. Changes to Multiple Instruments for Quarrying and Mining Activities

6.1 Summary

Amendments to the following four national policy instruments has occurred to allow for more consistent and enabling regulation and management of quarrying and mining activities, and better alignment between the respective instruments:

- National Policy Statement for Indigenous Biodiversity Amendment 2025 (NPS-IB)
- National Policy Statement for Freshwater Management Amendment 2025 (NPS-FM)
- Resource Management (National Environmental Standards for Freshwater) Amendment Regulations 2025 (NES-F)

- National Policy Statement for Highly Productive Land Amendment 2025 (NPS-HPL)

6.2 Assessment

These amendments do not impact the Sunfield proposal, as mining and quarrying activities are not proposed.

7. National Policy Statement for Renewable Electricity Generation Amendment 2025 (NPS-REG)

7.1 Summary

The amendments to the NPS-REG seek to increase the supply of renewable energy in New Zealand, noting the desire to achieve energy security and reduce the impacts of climate change. Of relevance, this includes providing a more certain consenting environment, particularly for small-scale and community scale renewable electricity generation. The definition of community-scale renewable electricity generation (REG) has been amended to the below⁴:

Community-scale renewable electricity generation (REG) means REG with the primary purpose of supplying electricity to a community.

The objectives and policies have been updated, with Policy B being replaced with the below:

Policy B: Considering cumulative gains and losses of renewable electricity generation capacity

1. *Decision-makers on REG assets and activities must recognise and provide for the importance of:*
 - a. *enabling cumulative increases of REG capacity and output at any scale and any location, including small-scale and community-scale REG assets and activities; and*
 - b. *avoiding, where practicable, any overall or cumulative losses of REG capacity and output from a region or district or existing REG assets and activities.*
2. *Decision-makers must have regard to any potential and reasonably foreseeable reduction in the utilisation of renewable electricity resources from inappropriate subdivision, use and development.*

7.2 Assessment

The Sunfield proposal will utilise on-site solar power and energy storage solutions throughout the community and is therefore considered a proposal which contains community-scale renewable electricity generation. Condition 109 is proposed to ensure that the sustainability outcomes of the proposal are secured, and that residential and commercial buildings are fitted with the necessary equipment.

⁴ Section 1.4 of NPS-REG

The amendments to the NPS-REG, including the update to Policy B, therefore strengthens the alignment of the Sunfield proposal with this national policy statement.

8. National Policy Statement for Electricity Networks Amendment 2025 (NPS-EN)

8.1 Summary

This national policy statement has been renamed from the National Policy Statement on Electricity Transmission to the National Policy Statement for Electricity Networks. This provides a high-level framework for the development and maintenance of the national grid, with the amendments broadening the scope of the NPS to cover the electricity distribution network and the electricity transmission network. The changes seek to recognise the national significance of electricity networks and create a more certain consenting environment.

8.2 Assessment

These amendments do not impact the Sunfield proposal, as a new electricity network or upgrades to the existing electricity network does not form part of the application.

9. Conclusion

Collectively, the newly introduced and amended national instruments seek to ensure that there is more certainty for consenting developments and proposals that have tangible benefits, and particularly in the case of natural hazards, a risk-based proportionate approach is used to assess such developments. The Sunfield proposal is considered consistent with the national instruments outlined above, recognising the benefits associated with Sunfield, and that this new policy further strengthens the alignment of the Sunfield proposal with national direction.

Yours faithfully,



Ian Smallburn – **Planning Consultant, Tattico Limited**