

By email

4 August 2025

Fast-Track Team Private Bag 63002 **WELLINGTON 6140**

Attention: Nick Sedgley, Application Lead,

Fast-Track Team

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WINTON LAND LIMITED - SUNFIELD PROJECT - COMMENTS OF 897 ALPHA LIMITED

- 1. We act for 897 Alpha Limited (897 Alpha), which is the owner of
- 2. 897 Alpha's comments on the Sunfield Project are **attached**.
- 3. 897 Alpha was invited to comment on the application by Winton Land Limited for resource consents for its Sunfield Project, which is a listed project under the Fast-track Approvals Act 2024 for residential development in rural Takanini as 897 Alpha is an adjacent landowner.
- 4. 897 Alpha supports urbanisation of rural land at Takanini but considers that if such land is to be urbanised it needs to be planned for in a comprehensive and integrated manner following structure planning and plan changes to implement either Future Urban or "live" urban zoning of the entire area between the current urban edge of Auckland and Hamlin Road.
- 5. In the absence of the usual strategic planning processes having been undertaken, our client is concerned that the Sunfield Project will fail to properly integrate with, and will generate adverse effects on, the surrounding areas.
- 6. Our client is particularly concerned with integration of stormwater management and transportation and has engaged experts in these disciplines to provide comment.
- 7. In the absence of such strategic planning, our client considers that conditions that ensure that the funding and timing of infrastructure is co-ordinated with development of the wider area are required.

- 8. While 897 Alpha is supportive of urbanisation in this area generally, if this outcome cannot be achieved, then our client's position is that the Sunfield application should be deferred until such strategic planning decisions have been made and plan changes to support coordinated urbanisation have been made operative.
- 9. 897 Alpha also has concerns regarding the level of technical assessment undertaken on the application by the Applicant's witnesses, given that there have been no wider background assessments such as those that would usually be undertaken to support structure planning and rezoning requests. 897 Alpha asks that the Panel consider appointing its own independent experts in stormwater management, development economics, and transportation to enable the Panel to properly evaluate the application.
- 10. If the Panel exercises its discretion to hold a hearing on the application, then our client would wish to attend the hearing and call evidence in support of its comments. Our client also wishes to participate in any procedural conferences, expert conferencing or other resolution processes that may be convened by the Panel.
- 11. Correspondence for 897 Alpha may be sent electronically to joanna@beresfordlaw.co.nz or posted to Beresford Law, PO Box 1088, Shortland Street, Auckland 1140.

Yours faithfully Beresford Law

Joanna Beresford Partner

JL Berisford

COMMENTS OF 897 ALPHA LIMITED

UNDER SECTION 53 OF THE FAST-TRACK APPROVALS ACT 2024 SUNFIELD PROJECT

INTRODUCTION AND SUMMARY

- The Winton Land Limited (the Applicant) seeks resource consents under the Fast-track Approvals Act 2024 (FTAA) to develop approximately 3,400 residential dwellings, a town centre, retail and healthcare buildings, three retirement villages and associated open spaces, green links, recreation parks and reserves, known as the Sunfield Project (Application) at 244.5 hectares at Old Wairoa Road, Cosgrave Road, and Airfield Road, between Takanini and Papakura (Sunfield Site). Approximately 25 percent of the Sunfield Site is zoned Future Urban Zone (FUZ) and is within the rural urban boundary (RUB). The remainder and majority of the Sunfield Site is zoned Mixed Rural Zone (MRZ).
- 2. These comments are made by 897 Alpha Limited (**897 Alpha**), the owner of (**897 Alpha Property**). 897 Alpha was required to be invited to comment under s 53(g) of the FTAA because the 897 Alpha Property is immediately adjacent to the Sunfield Site. The 897 Alpha Property is also zoned MRZ.
- 3. 897 Alpha's position is that the wider Papakura / Takanini Area to the east existing Takanini urban area, (including both the Sunfield Site and the 897 Alpha Property) is suitable for urban development. Accordingly, 897 Alpha is generally supportive of the urbanisation of the area, including the Sunfield Site.
- 4. However, 897 Alpha considers that before such urbanisation occurs the area should go through a structure planning process and plan change processes in the usual way. Plan change processes to rezone land to FUZ and relocate the RUB would provide an opportunity to identify how environmental constraints (particularly in relation to stormwater, traffic) and the timing and delivery of infrastructure will be addressed.
- 5. The resource management system uses a system of temporal and spatial hierarchies to co-ordinate urbanisation across the region and avoid ad-hoc development. This sequential process is well known, and is initiated by structure or master planning, followed by plan changes to settle zoning and determine where and how infrastructure will be delivered, and then resource consent applications once this wider framework is settled. The framework for urbanisation in the Takanini / Papakura area has not been settled.
- 6. The Application is for a comprehensive, large scale and intense, urban development in the MRZ outside of the RUB in advance of wider strategic and urban integration issues for the Takanini / Papakura area being resolved. Significant infrastructure upgrades are required to service the wider Takanini / Papakura area and mitigate the adverse effects of development and these are presently unplanned or unfunded.
- 7. 897 Alpha considers that if the Sunfield Site is to be developed as proposed by the Applicant then the best planning and environmental outcomes would be achieved by

the RUB being relocated to the North -South Leg of Hamlin Road (which would create a defensible boundary) and the land between MRZ land within this boundary rezoned to FUZ to enable comprehensive structure planning to be carried out and infrastructure holistically and appropriately planned for.

- 8. 897 Alpha acknowledges that this is not something that can be achieved through the Application because it seeks only resource consents rather than the plan change that would be required to relocate the RUB or change the zoning.
- 9. 897 Alpha therefore considers an equivalent of a structure planning and plan change process needs to be achieved through this Fast-track process and conditions on the consents sought, to ensure that the Application will not result in significant adverse effects on the environment and potentially foreclose on, or limit, future urban development opportunities in the wider area. Such an ad-hoc outcome would fail to properly deliver the regional economic benefits that are fundamental to purpose of the FTAA.

SCOPE OF COMMENTS

- 10. These comments address the following topics:
 - (a) 897 Alpha's interest in the Application and surrounding area.
 - (b) FTAA Legislative Framework.
 - (c) Adverse Impacts:
 - (i) Inconsistency with planning framework.
 - (ii) Adverse effects on the environment.
 - (d) Outcome sought.
- 11. 897 Alpha has obtained technical or expert advice on the Sunfield Application from:
 - (a) Nigel Hosken, Hosken Associates, Development Project Director (**Schedule One**).
 - (b) Rose Mason, Te Miro Water, Stormwater and Flooding (**Schedule Two**).
 - (c) John Parlane, Parlane and Associates, Transportation (**Schedule Three**).

PARTICIPANT'S INTERESTS IN APPLICATION AND SURROUNDS

12.	897 Alpha is the owner of the 8	897 Alpha Pro _l	perty, being an ap	proximately 7.5ha at
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Part Allotment 29 Parish of Hunua and Part Allotment 32 Parish of Papakura, comprised in record of title NA10B/222.

- 13. 897 Alpha is a family-owned land holding company. One of its shareholders, Ms Chen is also the owner of an approximately 5.3ha property at 382 Airfield Road.²
- 14. The 897 Alpha Property is approximately 7.5ha. The location and zoning of the 897 Alpha Property is shown in Figure One outlined in turquoise:

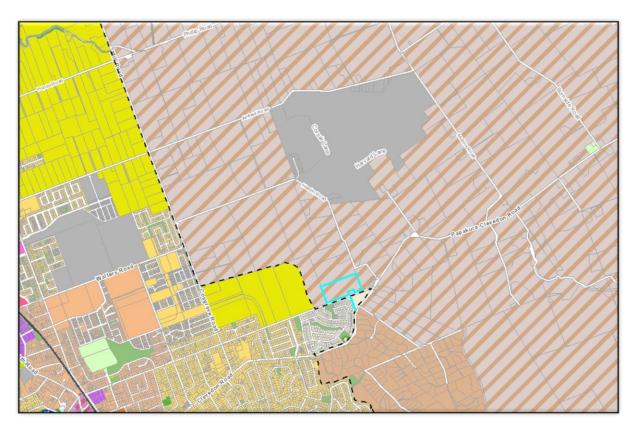


Figure One: Zoning and location of 897 Alpha Property

Lot 1 DP 96780, comprised in record of title NA64D/880.

15. The location of the 897 Alpha Property and Ms Chen's Property relative to the Sunfield Site is shown in Figure Two.



Figure Two: Tseng and Chen Family Property Interests

- 16. While these comments are on behalf of 897 Alpha, collectively the family has interests in approximately 12.8ha of land in close proximity to the Sunfield Site.
- 17. Accordingly, it is important to 897 Alpha that urbanisation of the wider area is integrated and co-ordinated with infrastructure. Conditions of consent on the Sunfield Application that would transfer adverse effects to the surrounding area, and limit the co-ordinated and integrated urban development of the surrounding area would not be acceptable to 897 Alpha. This difficulty is discussed further below, particularly in relation to stormwater and flooding.

LEGISLATIVE FRAMEWORK

- 18. While the Panel will need to comprehensively consider the legislative framework under the new Fast-track Act, the key framework issues relevant to 897 Alpha's comments are:
 - (a) The extent to which the Panel may set conditions on the Application to address the wider strategic planning and urban development issues raised by Application.
 - (b) Whether the Panel may decline the Application (i.e. to allow those wider issues to be addressed through other planning processes).

Consideration of approvals

- 19. After considering the information received by the Panel, the Panel is required to decide whether to grant the Application and set any conditions to be imposed on the Application, or decline the approval.³
- 20. For resource consents, the Panel must apply clauses 17-22 of Schedule 5 of the FTAA, which also specify the weight to be given to the purpose of the FTAA when making its decision.⁴
- 21. When taking the purpose of this FTAA into account under clauses 17-22 of Schedule 5 of the FTAA, the Panel must consider the extent of the project's regional or national benefits.⁵
- 22. Under cl 17 of Schedule 5 the Panel, when considering the Application (including proposed conditions) must take into account (giving greatest weight to (a)):
 - (a) The purpose of the FTAA, being "to facilitate the delivery of infrastructure and development projects with significant regional or national benefits."⁶
 - (b) Parts 2, 3, 6, and 8 to 10 of the Resource Management Act 1991 (**RMA**) that direct decision making on an application for a resource consent (but excluding section 104D of that Act).
 - (c) Accordingly, the following provisions of the RMA remain relevant to the Panel's consideration of the Application:
 - (i) The purpose of principles of the RMA including sustainable management, matters of national importance (including management of significant risks for natural hazards), and the efficient use and development of natural and physical resources all remain relevant to the Panel's consideration of the Application.
 - (ii) Section 104(1) (but not the gateway tests for non-complying activities), which requires that Panel to have regard to:

³ FTAA, ss81(1)-81(2).

⁴ FTAA, s81(2)(b) and s 81(3)(b).

⁵ FTAA s81(4).

⁶ FTAA, s3.

- A. any actual and potential effects on the environment of allowing the activity;
- B. any measure proposed or agreed to by the applicant for the purpose of ensuring positive effects on the environment to offset or compensate for any adverse effects on the environment that will or may result from allowing the activity;
- C. any relevant provisions of a national environmental standard, other regulations, a national policy statement, a New Zealand coastal policy statement, a regional policy statement or proposed regional policy statement, a plan or proposed plan; and
- D. any other matter the consent authority considers relevant and reasonably necessary to determine the application.
- (iii) Section 106 that provides that the Panel may refuse to grant a subdivision consent if it considers that there is a significant risk of natural hazards.

Power to set conditions

- 23. Clause 18 of Schedule 5 of the FTAA provides that the provisions of Parts 6, 9, and 10 of the RMA that are relevant to setting conditions on a resource consent, apply (with all necessary modifications).
- 24. This means that the starting point for the imposition of conditions is that the Panel has full access to the full range of conditions allowed for under the RMA, including bonds under s108A along with the usual constraints that conditions must be directly connected to an adverse effect of the application or an applicable district or regional rule that has triggered a requirement for consent (unless agreed by the Applicant).⁷
- 25. However, an additional consideration applies to Fast-track approvals being that the Panel must not exercise its discretion to set a condition that is more onerous than necessary to address the reason for which it is set in accordance with the provision of the FTAA that confers the discretion.⁸

Power to decline or grant consent

26. The Panel may decline the approval only in accordance with s 85 of the FTAA.⁹ Subsections 85(1) and s 85(2) specify when an approval must be declined. Subsections 85(3) specifies when a Panel may decline an approval. Subsection 85(3) states:

Approval may be declined if adverse impacts out of proportion to regional or national benefits

(3) A panel may decline an approval if, in complying with section 81(2), the panel forms the view that—

⁷ RMA, s 108AA(1) and s108AA (2).

⁸ FTAA, s83.

⁹ FTAA, s81(2)(f).

- (a) there are 1 or more adverse impacts in relation to the approval sought; and
- (a) those adverse impacts are **sufficiently significant to be out of proportion to the project's regional or national benefits** that the panel has considered under section 81(4), even after taking into account—
 - (i) any conditions that the panel may set in relation to those adverse impacts; and
 - (ii) any conditions or modifications that the applicant may agree to or propose to avoid, remedy, mitigate, offset, or compensate for those adverse impacts.
- (4) To avoid doubt, a panel may not form the view that an adverse impact meets the threshold in subsection (3)(b) solely on the basis that the adverse impact is inconsistent with or contrary to a provision of a specified Act or any other document that a panel must take into account or otherwise consider in complying with section 81(2).
- (5) In subsections (3) and (4), **adverse impact** means any matter considered by the panel in complying with section 81(2) that weighs against granting the approval.

(Emphasis added)

Application of FTAA framework to Sunfield

- 27. The task before the Panel is a balancing exercise. The Panel is required to assess the regional benefits of the Sunfield Application against the adverse impacts of the proposal (as mitigated by any conditions offered by the Applicant or proposed to be set by the Panel).
- 28. While that balancing exercise is initially weighted towards granting a proposal if there are regional benefits associated with the Application, that balance can be tipped in favour of decline where the adverse impacts are sufficiently significant to be out of proportion with those benefits.
- 29. In the context of undertaking the required balancing exercise, it is important that:
 - (a) the level of the regional benefits of a particular development proposal are rigorously assessed by the Panel and not allowed to be overstated by the Applicant; and
 - (b) the level of adverse impacts are the Application are rigorously assessed by the Panel and not allowed to be understated by the Applicant.
- 30. An error on either side of the scale could result in an incorrect evaluation of the application under the FTAA decision making framework.
- 31. Importantly, "adverse impacts", includes but is a broader concept than "adverse effects on the environment".
- 32. Inconsistency with of the matters outlined in paragraph 22(c) above could constitute an "adverse impact" for the purposes of decision making under the FTAA.
- 33. It is for the Panel to determine whether the adverse impacts identified (as mitigated by conditions) are sufficiently significant to outweigh the regional benefits of the Application.

- 34. As discussed below, 897 Alpha has concerns regarding the level of technical assessment undertaken on the application by the Applicant's witnesses. There have been no wider background assessments such as those that would usually be undertaken to support structure planning and rezoning requests.
- 35. Accordingly, 897 Alpha asks that the Panel consider appointing its own independent experts in stormwater management, development economics and transportation to enable the Panel to properly evaluate the Application and subsequent responses from the Applicant.

ADVERSE IMPACTS OF THE PROPOSAL

National Direction

- 36. The National Policy Statement on Urban Development 2020 (**NPS UD**) applies to all local authorities that have all or part of an urban environment within their district or region (i.e., tier 1, 2 and 3 local authorities); and planning decisions by any local authority that affect an urban environment, which means an area that is, or is intended to be, predominantly urban in character and is, or is intended to be, part of a housing or labour market of at least 10,000 people.¹⁰
- 37. The majority of the Sunfield Site is MRZ and located outside the RUB so there is currently no planning intention for it to be an urban area. However, the Applicant has provided an assessment against the objectives and policies of the NPS UD as if this was a planned urban area.¹¹
- 38. Unsurprisingly, the NPS UD does not deal with resource consent applications for urban development in rural areas. Rather Policy 8 of the NPS-UD anticipates that out of sequence land release will be advanced by plan changes (and the level of assessment that such changes entail):

Policy 8: Local authority decisions affecting urban environments are **responsive to plan changes** that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is:

- (a) unanticipated by RMA planning documents; or
- (b) out-of-sequence with planned land release.

(Emphasis added).

39. The Future Development Strategy required under the NPS-UD to integrate and coordinate land release, infrastructure and development, anticipates urbanisation in the Takanini area not before 2050 and identifies Mill Road and the Takanini FTN Upgrade as infrastructure pre-requisites.

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NPS UD, 1.3 Application.

Sunfield Fast-track Approvals Act 2024 Substantive Application Planning Report, March 2025, at page 217.

Regional Policy Statement Growth Framework

40. In terms of the Panel's consideration of the applicable planning instruments, the Auckland Unitary Plan Operative in Part (**AUP**) contains both the Auckland Regional Policy Statement (RPS) and the district planning rules that apply to the MRZ and the FUZ.

Regional Policy Statement

- 41. Chapter G (Rural Urban Boundary) states:
 - G1. Rural Urban Boundary G Rural Urban Boundary (RUB)

The Rural Urban Boundary identifies land potentially suitable for urban development.

The location of the Rural Urban Boundary is a district plan land use rule pursuant to section 9(3) of the Resource Management Act 1991, other than for Waiheke Island where it is an interim regional policy statement method until it is considered as part of a plan change to incorporate the Auckland Council District Plan – Operative Hauraki Gulf Islands Section into the Unitary Plan. The planning maps show the Rural Urban Boundary line.

The **only method** for relocating the Rural Urban Boundary **is by way of a plan change** pursuant to Schedule 1 of the Resource Management Act 1991.

Any relocation of the Rural Urban Boundary **must** give effect to the objectives and policies of the regional policy statement which establish it.

(Emphasis added)

- 42. Urban growth and form is identified as a significant resource management issue for the Auckland region¹² and the RUB, Structure Plan Guidelines in Appendix 1 of the AUP) and zone objectives, policies and rules are regulatory methods used to implement the RPS.¹³ In relation to comprehensive structure planning, 897 Alpha notes that in the structure planning for the nearby Alfriston Village covered an area of 730ha to support a private plan change covering 70-80ha.¹⁴
- 43. Chapter B2 of the RPS sets out the issues, objectives and policies with respect to Auckland's Urban Growth and Form. The policies in B2.2.2, that address development capacity and supply of land for urban development, the location or relocation of the RUB and the promotion of a quality compact urban form are particularly relevant to the Application.
- 44. There have been relatively few applications for large-scale urban development outside of the RUB.
- 45. A comparable case (although still considerably smaller scale and less clearly urban) is *Ahureka Trustees Limited*¹⁵ in which the applicant sought non-complying activity consent for a 16.5ha residential development of 186 households outside of the RUB in the Country Living Zone at Whitford. The primary point of contention between the applicant and the Council in that case was the application of the RPS.

¹² RPS, B1.4 Issues of Regional Significance.

¹³ RPS, B1.6 Methods.

https://alfristonvillage.co.nz/#structure

Ahureka Trustees (No. 2) Limited v Auckland Council [2017] NZEnvC 205.

- 46. In *Ahureka* the Environment Court considered Chapter G1 of the AUP and the relevant provisions of Chapter B2 of the AUP (Urban Growth and Form) commenting that:
 - (a) land outside of the RUB is not land that the AUP has identified as being suitable for residential development; 16
 - (b) the theme of containing urban growth to achieve a "compact urban form" is clear; that Objective B2.2.1(4) "urbanisation is contained" within the RUB and towns and villages is clear and directive and the need for efficient and integrated provision of infrastructure is identified in the Objectives;¹⁷ and
 - (c) the theme of concentrating urban (and residential) growth and intensification within the RUB and identified towns and villages (including local and neighbourhood centres) is a clear thrust of the Policies.¹⁸
- 47. The Court went on to summarise the applicable regional policy framework as follows:

There are three themes which are prominent throughout the various Objectives and Policies relating to urban growth which we have identified and which are consistent in their approach. They are that:

- Urbanisation and residential intensification should occur so as to achieve a compact urban form and be contained within the RUB or existing rural and coastal towns and villages;
- Urban growth should happen in residential zones which provide for a range of residential needs and intensities;
- Urban development and residential intensification elsewhere (including the extension of existing towns and villages) must take place through structure plan and plan change processes to ensure the efficient use and development of infrastructure and to be consistent with the hierarchy for intensity of residential development identified in the Unitary Plan.
- 48. In declining to grant consent the Environment Court stated:

[127] The proposal is for a stand alone residential development advanced by way of resource consent application when the relevant provisions of the Unitary Plan require that such proposals are advanced by way of structure plan and plan change processes to achieve the residential hierarchy identified in the Plan and ensure efficient development of infrastructure.

[128] Additionally, the proposal involves a massive undershooting of the requirements of the Unitary Plan for environmental enhancement in conjunction with development in Sub-precinct B.

[129] We find that the proposal is directly contrary to Objectives B2.2.1(4) and (5),B2.3.1(1)(b) and (d) and B2.4.1(1) and (3) and Policies B2.2.2(5) and (6), B2.4.2(2) and B2.6.2(3) of the Unitary Plan.

Ahureka Trustees (No. 2) Limited v Auckland Council [2017] NZEnvC 205 at [39].

Ahureka Trustees Limited (No. 2) v Auckland Council [2017] NZEnvC 205 at [41].

Ahureka Trustees Limited (No. 2) v Auckland Council [2017] NZEnvC 205 at [43].

[130] When all of the relevant provisions of the Unitary Plan (Identification of Issues, Methods, Objectives, Policies, Rules and Explanation) are read holistically, we find that the proposal is contrary to the general thrust of the Plan which seeks to achieve a compact urban form by containing urban development in the manner and by the methods that we have described.

[131] Finally, in terms of s 104(1)(c) we have found that the grant of consent to this proposal would undermine the integrity of the Unitary Plan and provide a precedent for further urbanization of an area which is presently subject to growth pressure.

49. On appeal, the High Court, in upholding the Environment Court's decision to decline the application, summarised the regional policy framework as follows: 19

[14] The Regional Policy Statement includes the objective that urban growth ought to occur in a quality, compact urban form. A 'compact urban form' is described in the plan as one having clear boundaries, within which residential and commercial areas are relatively close together. The concept is central to the Regional Policy Statement. This is achieved in part by the Rural Urban Boundary (RUB). The RUB is a "district plan use rule". In plain English, as described by the Environment Court in a different decision, it is simply "a line on a map". It is intended to provide a clear delineation between urban and rural areas, and define the maximum extent of urban development in Auckland until 2040. It is a method of achieving the goal of a compact urban form.

- 50. Given the clear and directive policy regime, the Sunfield Project, being large-scale urban development in a rural zone outside of the RUB and in advance of structure planning and the type of plan change required by the RPS means the Application is inconsistent with the RPS growth framework.
- 51. However, such inconsistencies would not necessarily be fatal to an application under the Fast-track regime (for example if the national or regional benefits were sufficiently significant) but these issues should be considered an adverse impact of the Application that needs to be mitigated and then weighed against the regional benefits of the Application.

Location of the urban edge of Auckland

- 52. The Applicant is not proposing to relocate the RUB, however, the effect of implementing the consents would be that in practice the boundary between urban Auckland and rural Auckland would be the boundary between the Sunfield Site and the 897 Alpha Property. There is no strong natural or physical boundary between these two sites that demarks this as a sensible location for a de facto RUB.
- 53. This would seem at odds with Policy B2.2.2(2)(m) of the RPS that requires aligning the RUB with strong natural boundaries such as the coastal edge, rivers, natural catchments or watersheds, and prominent ridgelines; or where strong natural boundaries are not present, then other natural elements such as streams, wetlands, identified outstanding natural landscapes or features or significant ecological areas, or human elements such as property boundaries, open space, road or rail boundaries, electricity transmission corridors or airport flight paths.

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¹⁹ Ahureka Trustees (No. 2) Limited v Auckland Council [2019] NZHC 3142 at [14].

54. 897 Alpha considers that if this area is to be urbanised it should include not just the Sunfield site but out to at least the north-south leg of Hamlin Road, which as was originally envisaged in the Takanini Structure Plan 2000.

Zoning

- 55. In summary, the zone descriptions, objectives and policies of the FUZ and MRZ area provide that:
 - (a) MRZ is intended to provide for rural production and non-residential supporting activities with a mix of rural lifestyle activities, which is to be achieved by limiting the size and scale of non-rural activities.
 - (b) While FUZ is applied to land that has been identified as suitable for urbanisation, the AUP uses strongly directive language stating that FUZ land "may be used for a range of general rural activities but cannot be used for urban activities until the site is rezoned for urban purposes" and "[u]rbanisation on sites zoned Future Urban Zone is avoided until the sites have been rezoned for urban purposes.
- 56. It is unlikely to be in dispute that the Application is inconsistent with the zoning. Again, this inconsistency may not be fatal in a Fast-track regime, however, it is an adverse impact of the Application and needs to be mitigated and then be weighed against the regional benefits of the Application.

ADVERSE IMPACTS

Economic and development integration impacts

- 57. **Attached** is Schedule One is Mr Hosken's review of development integration issues for the Application.
- 58. Mr Hosken is a Development Director that has been engaged by 897 Alpha to provide advice on the implications of the Application on the 897 Alpha Property. Mr Hosken has considerable experience in greenfield development in southern Auckland, having led the Addison, Karaka Harbourside, Karaka Lakes Takanini Area 6, Takanini Area 2a / 2b (Cosgrave and Kirikiri Residents), Kingseat and Belmont Pukekohe developments.
- 59. Mr Hosken has reviewed the Application and identified potential adverse effects of failures of the proposal to integrate land use development and infrastructure provision across the wider Takanini area based on his experience with similar projects.

Adverse stormwater and flooding effects

- 60. **Attached** is Schedule Two is Ms Mason's review of the proposed stormwater and flooding management for the Application.
- 61. Ms Mason raises serious concerns. In summary:
 - (a) The Application proposes raising areas of the Sunfield Site to address stormwater and flooding issues within the Sunfield Site, which will have flow on effects to land outside of the Sunfield Site. The land south of altered Hamlin

Road will be recontoured and reformed to divert stormwater to the upstream Pāhurehure Inlet catchment (Old Wairoa Road stormwater sub catchment). The pre-development discharge area to the Pāhurehure Inlet catchment is 94 ha, the proposed design increases (and almost doubles) this by 81 ha to 175 ha, almost doubling the runoff area with an increase of 81 ha.

- (b) The Application diverts the increased catchment area to the Stage 3 Awakeri Wetland Channel but does not consider any risk of failure or impediments in the flood corridor during a significant storm event and the cumulative effects of increased volume in the event of blockage or backwater occurring.
- (c) Beyond the development site, any failure in the existing upstream Old Wairoa Road sub catchment, and the wider Pāhurehure Inlet catchment, stormwater network and flood management corridor, for the 1 in 10 and 100-year storm event, will be, at worst case, potentially catastrophic to properties within proximity to the flood plain, such as with an increase to the flood volume footprint following a blockage.
- (d) A full risk assessment has not been addressed for the flood conveyance corridor up-to the Manukau Harbour for the proposed increase in catchment area of 81 ha which poses a significant risk in the event of failure.
- (e) On the downstream western boundary of the development site stormwater conveyance is reliant on the Cosgrave Road culvert, which will exacerbate a natural hazard by diverting flows outside the site's catchment and does not align with industry best practice. Any, developments and flood profile within that catchment would not have allowed for future additional volume and flows from another catchment. The effects are therefore not planned or provided for beyond the development site.
- (f) The development proposal seeks to resolve via a syphon system during the 100-year event to navigate Cosgrove Road elevated level, the downstream channel is also higher but the effect of a failure of the proposed syphon system has not been property assessed.
- (g) The CKL Memo,²⁰ and the Mckenzie & Co Memo,²¹ identify further and wider assessment and full modelling (that has no been done) is required.
- 62. 897 Alpha considers that the flooding and stormwater proposals for the Sunfield Project illustrate its concerns with development being approved prior to proper modelling of the stormwater environment and mitigation solutions across the whole catchment.
- 63. Given that the Applicant is proposing urbanisation in a rural area ahead of structure planning and the level of stormwater and flooding assessment required for plan changes that bring down live urban zoning, 897 Alpha considers that the Applicant should be required to undertake the full assessment and modelling that the peer reviewers and recommended to demonstrate that its Application will not have an

Sunfield Development – Takanini Stormwater Management - Proof of Concept Review (Rev A), dated 10 February 2025.

Sunfield Fast Track Application – 3 Waters Review, dated 24 January 2025.

- unacceptable level of adverse stormwater and flooding across the two catchments and that the proposed subdivision would not be contrary to s 106 of the RMA.
- 64. If the effect of approving the Application would be to transfer stormwater and flooding risk to elsewhere in the catchment in a manner that limits the development potential of the wider area then that is both an outcome that is at odds with the purpose of the FTAA of facilitating development with regional benefits.

Adverse traffic and transportation effects

- 65. **Attached** is Schedule Three is Mr Parlane's review of the transportation proposals for the Application.
- 66. Mr Parlane has concerns with the assumptions underpinning the transportation approach: In summary:
 - (a) The Integrated Transport Assessment is predicated on achieving a very low level of car use through parking limits on the development, resulting in a very low levels of additional traffic such that the Applicant would need to achieve trip generations that are lower than anywhere Mr Parlane has surveyed. That appears to be overly ambitious given the lack of employment within walking distance and the lack of alternative transport options.
 - (b) The parking constraints will have impacts on surrounding areas where there is parking available for residents and visitors. Mr Parlane would expect that any free parking space within quite a distance would become used as an alternative parking area for this development.
- 67. Mr Parlane recommends that if the development were to proceed then there would need to be very strict conditions to prevent an increase in parking occurring once enough houses had been built for the parking problem to become apparent. This would need to be a fixed limit on parking spaces within the entire precinct. However, this would then likely impact the neighbouring area, as residents would simply park there.
- 68. Further, 897 Alpha is concerned with the prospect of urban development in the area proceeding in advance of the wider road network being settled. As discussed in Mr Hosken's review, there is considerable uncertainty about the form, location and purpose of the Stage 2 of the Mill Road Corridor upgrade. The New Zealand Transport Agency has recently lodged a notice of requirement that would move the Mill Road corridor from where it had previously been consulted on to along the eastern edge of the Sunfield Site (i.e. at what would become the urban edge of Auckland if the Application was granted) so that the new Mill Road would only have a western catchment.
- 69. 897 Alpha considers that urbanisation of the wider Takanini / Papakura area should be planned for and integrated with a future roading network that meets the needs of the area rather than the future road network needing to be planned around the Sunfield Project.

MITIGATION AND CONDITIONS

70. 897 Alpha is generally supportive of urban development in the area provided that the concerns raised in these comments can be adequately addressed.

71. 897 Alpha considers that the Applicant is required to demonstrate that the adverse impacts of the proposal will be appropriately mitigated by conditions on the Application.

OUTCOME SOUGHT

- 72. 897 Alpha is generally supportive of the urbanisation of the Sunfield Site and considers that the wider Takanini / Papakura area out to Hamlin Road should be zoned FUZ and brought within the RUB.
- 73. However, 897 Alpha considers that unless an equivalent of a structure planning and plan change process can be achieved through the Fast-track process and via conditions on the Application, then the Application will result in significant adverse effects on the environment and foreclose on, or limit, future urban development opportunities in the wider area and there will be a failure to realise the regional economic benefits of urbanisation that are central to the purpose of the FTAA.
- 74. If the Panel considers that it cannot impose conditions on the Application that would adequately address 897 Alpha's concerns raised in these comments, then the appropriate course of action would be to decline the Application and for the wider area to be subject to structure planning and plan change(s) to bring down either FUZ or live urban zonings in the usual way.

PARTICIPATION IN PROCESS

- 75. The Practice and Procedure Guidance²² identifies a number of possible procedural, inquisitorial or adversarial processes that may be used by Panels to evaluate and determine Fast-track approvals.
- 76. In that regard, the 897 Alpha wishes to be participate in any procedural conferences, mediation or alternative dispute resolution processes, witness conferencing or hearings that the Panel convenes in relation to the Application. Given that 897 Alpha has engaged counsel and experts to assist, it would appreciate as much advanced notice of any hearing as possible.²³
- 77. 897 Alpha also welcomes the opportunity to provide comment on any draft conditions proposed by the Panel in accordance with section70(1) of the FTAA.

DATED 4 August 2025

JL Bens forch

JL Beresford

Counsel for 897 ALPHA LIMITED

Fast-track Approvals Act 2024: Panel Conveners' Practice and Procedure Guidance July 2025.

FTAA, s 57(4) requires only 5 working days' notice.

Address for service: Beresford Law, Level 6, 20 Waterloo Quadrant, Auckland, 1010. PO Box 1088, Shortland Street Auckland. Attention: Joanna Beresford. Phone +64 9 307 1277. Mobile: +64 21 114 1277. Email: joanna@beresfordlaw.co.nz

SCHEDULE ONE: DEVELOPMENT INTEGRATION

Client: 897 Alpha Limited

Project: Winton - Sunfield

SUNFIELD PROJECT DEVELOPMENT INTEGRATION COMMENTS

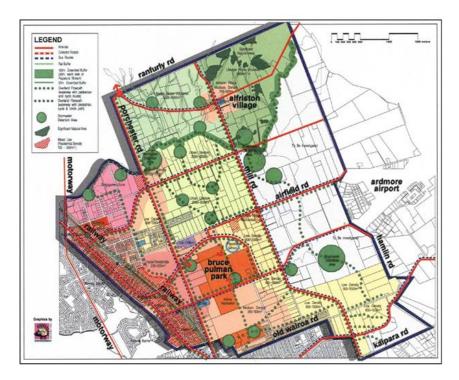
1. My name is Nigel David Hosken. I am a Registered Architect and Principal of Hosken and Associates Limited. I reside in Auckland.

- 2. I hold the following qualifications, being a Degree in Architecture from Auckland University and a Post Graduate Diploma in Business Management from Deakin University, Melbourne, Australia. I am an Associate Member of the New Zealand Institute of Architects and registered as an Architect under the New Zealand Registered Architects Board.
- 3. I have thirty-eight years of architectural experience with twenty-nine years working as a specialist Development Project Director. The development project director's role includes general project administration, client representation, project management which includes the structuring and establishment of legal development entities, preparing and arranging for project funding, preparing work scope, budgeting, briefing and appointment of all consultants in relation to all matters associated with resource management, including plan change and district plan change preparation, experience in subdivision design, urban design and building design of all types including residential, commercial, industrial and recreational. I have considerable experience in the design, preparation and management of significant development proposals and projects both in New Zealand and overseas.
- 4. In the Takanini Corridor where Council proposed Stages 1 to 10 for development in 2000, 5 stages have proceeded. Stages 1a1b, 2a & 2b, 3 and 6a6b.



Staging Plan from Takanini Structure Plan

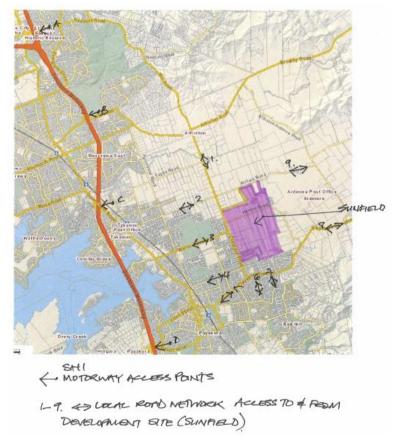
- 5. Of the 5 stages, I led the teams that prepared the Private Plan Changes for 4 of those areas, as listed below. Of the 4 plan changes 3 were adopted by Council as Public Plan Changes and the 4th for Area 2a remained a Private Plan Change:
 - (a) Takanini 1a/1b known as "Addison" for Hawkins Construction Ltd (Hawkins) and its successor McConnell Property Ltd (McConnells).
 - (b) Takanini Area 2a Cosgrave Residents and Landowners Association Inc.
 - (c) Takanini Area 2b Kirikiri Residents and Landowners Association Inc.
 - (d) Takanini Area 6a6b Takanini Structure Plan Area 6 Ltd
- 6. The proposal makes no mention of the Takanini Structure Plan prepared by Papakura District Council and still provides the basis for current planning.
- 7. This plan has provided the basis for all infrastructure providers, Watercare, Veolia, Vector, Chorus etc to base their asset management plans to service the planned growth in Takanini.
- 8. The majority of the Sunfield proposal falls outside the planned service area.



9. For the Sunfield site the Structure Plan anticipates residential land uses south of Ardmore away from the airport noise contours and the balance to remain rural.

10. Other key points are

- (a) Mill Road is to provide the north south arterial road to support the eastern edge of the planned development
- (b) Two areas of stormwater detention east of Mill Road, one area opposite Popes Road to the north and the other on the Sunfield site. This has become Pond 4 in the Sunfield Concept Plan.
- (c) The Structure Plan retained rural land uses east of Mill Road to provide a buffer to Ardmore Airfield, keeping residential neighbourhoods away from the noise and to avoid areas known to be prone to regular flooding.
- 11. The report prepared by John Parlane on transportation indicates there are challenges with the proposed approach. In addition, the following points need to be addressed.
- 12. The broader road network in Takanini that the proposed Sunfield development is to fit within remains for the most part the same road network and standard that served the rural community before any growth.



- 13. As the area has grown over the last 25 years the network above is under pressure. The main direction of travel from Sunfield is north toward Manukau and the Auckland CBD. To achieve this objective the principal direction of travel from the Sunfield site is east toward State Highway 1 or one route north via Mill Road. All of these routes are already congested, and the Sunfields' proposal depends on the carless proposal succeeding.
- 14. The key roading upgrade adding more capacity in this area is the proposed Mill Road Expressway to link SH1 at Drury through to Redoubt Road in Manukau.
- 15. The Takanini Structure Plan anticipated this expressway to be provided by upgrading the existing Mill Road alignment over time. This project is divided into 3 stages, with Stage 1 from Manukau to Alfriston underway, Stage 2 heading for Notice of Requirement notification and Stage 3 still to be determined.
- 16. The Proposed Stage 2 alignment if shown below

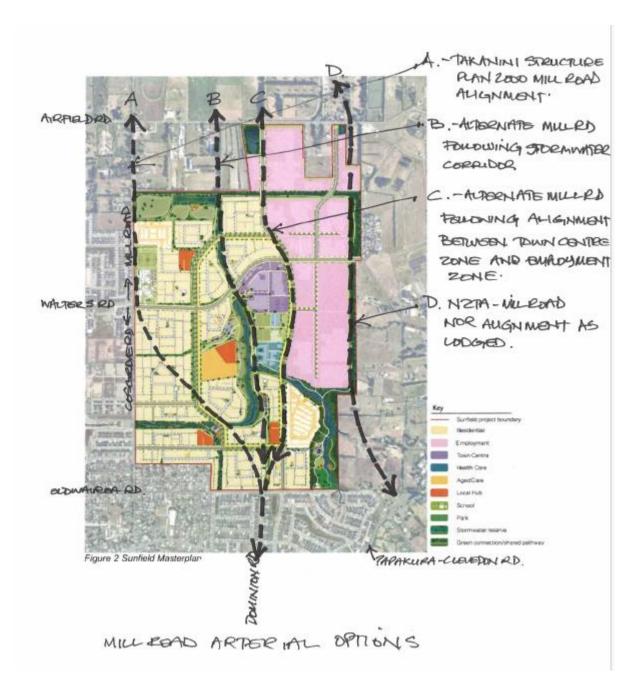


This shows the alignment passing to the east of Sunfield between Sunfield and Ardmore Airport outside of the development site.

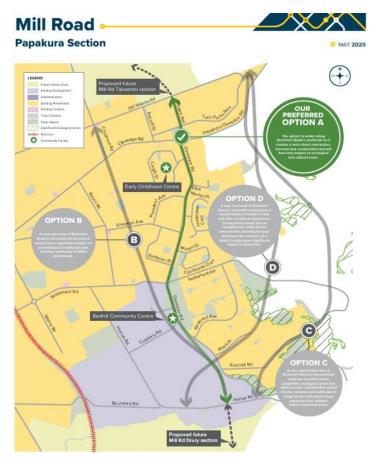
17. This alignment is contrary to all the options presented previously



- 18. The NOR as now proposed by NZTA moves the arterial away from the developments it was intended to serve. It will create the need for Council to extend all the east west road networks to access the arterial and it will create pressure for that land between the existing Mill Road and the arterial to be urbanised. An outcome the Takanini Structure Plan was seeking to avoid due to persistent flooding.
- 19. To see the effect of the different alignments these have been overlaid on the Sunfield Concept Plan to graphically look at the effects of each and whether they integrate with the future Stage 3.



20. All of the Mill Road alignments are functional and while the propose NOR alignment affects Sunfield the least when it moves to Stage 3 to pass through the foothills the route has the greatest environmental effect, is longer at 3600m vs 3000m and affects a greater number of properties 112 vs 84. All increasing the overall project cost. The alternative alignments are shown on the following plan with Dominion Road the NZTA's preferred option at the time.



- 21. The Proposal is based on the concept of "live work and play". Essential reducing the need for travel by having all needs satisfied within the local community.
- 22. However, in the economic reporting it is clear that this proposal will service a greater catchment area. This will generate traffic flows into Sunfield not currently modelled.
- 23. There is also no documentation covering development contributions to cover the provision of infrastructure for tis development. It is outside of the current plans based on the Takanini Structure Plan which in turn informed the Council financial models.



24. There is a portion of Sunfield within those models and noted on the following plan however there is the issue of how public infrastructure fully funded by developers now to be extended and utilised by others is recognised. Is the overall cost of the service divided over a greater number of developments reducing the per lot charged for all.

Yours faithfully,

Nigel Hosken Hosken & Associates Ltd M (+64) 274 770 773 E nigel @hosken.co.nz

SCHEDULE TWO: FLOODING AND STORMWATER



Te Miro Water Consultant Ltd.
Unit 14, 3 Empire Street
Cambridge 3434

Nigel Hosken Hosken & Associates Limited

Date: 31st July 2025

Client:

Address: Sunfield Development Fast Track Application

Scope: High level review of the Sunfield Development 100-year stormwater runoff management

Dear Nigel,

Following a high-level review of the proposed flood management, please find below Te Miro Water (TMW) comments for consideration of the. Please contact the undersigned for any clarification.

The 244.5-hectare development site, refer figure 1, is predominately located within the Papakura Stream catchment, refer figure 4, sub catchment Ardmore stormwater catchment, and in-part within the Pāhurehure Inlet catchment, refer figure 3, sub catchment Old Wairoa Road stormwater catchment. Auckland Council GIS layer 'Catchments and Hydrology – Overland Flow Paths' indicates the extent of the development site falling south-west to the Old Wairoa Road sub catchment, refer figures 2, 3 and 5.

The proposal seeks to alter the alignment of Hamlin Road to intersect with Walters via an s-bend. The land south of altered Hamlin Road will be recontoured and reformed to divert runoff, both surface and piped, to the upstream Pāhurehure Inlet catchment (Old Wairoa Road stormwater sub catchment).

The SMP report identifies the pre-development discharge area to the Pāhurehure Inlet catchment is 94 ha, the proposed design increases the area post-development to 175 ha, almost doubling the runoff area with an increase of 81 ha. Noting that the Auckland Council GIS layer 'Catchments and Hydrology – Overland Flow Paths' indicates approximately 69 ha of the development site falling south-west to the Awakeri Wetlands in the Old Wairoa Road sub catchment, refer figure 2.



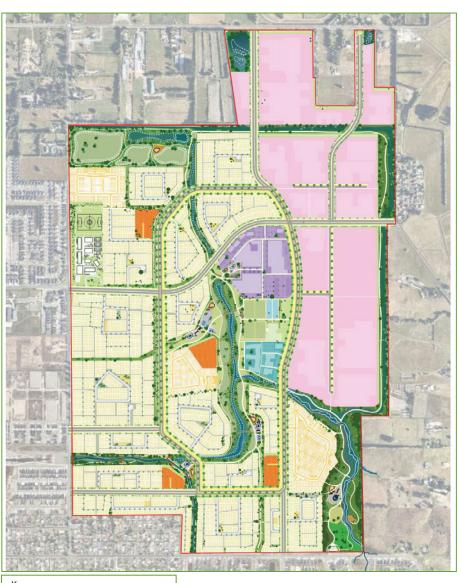




Figure 1: Concept Masterplan. Source - https://www.fasttrack.govt.nz/ data/assets/pdf file/0021/3882/3a.-Sunfield-Masterplanned-Community-Concept-Masterplan part-a.pdf





Figure 2: Indicative development catchment area discharging to Old Wairoa Road Catchment, subsidiary of the Pāhurehure Inlet catchment discharging to the Manukau Harbour. Source - Auckland Council GIS

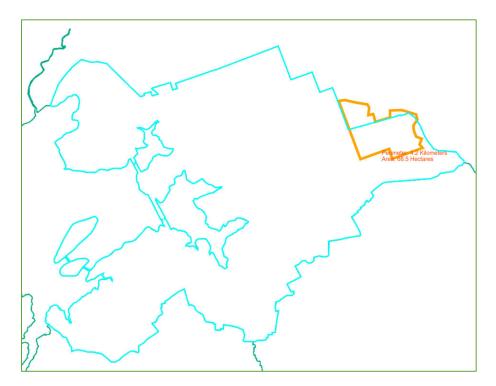


Figure 3: Pāhurehure Inlet catchment discharging to the Manukau Harbour. Source - Auckland Council GIS



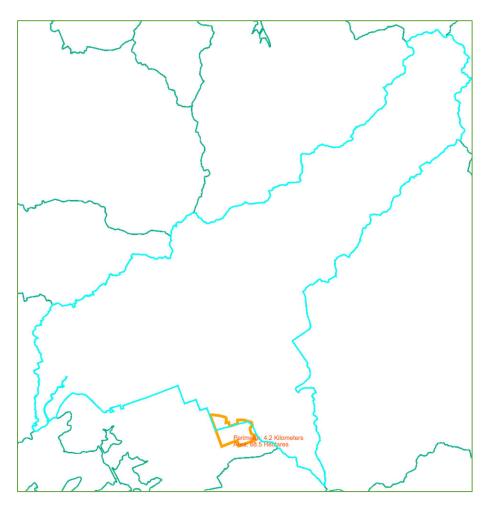


Figure 4: Papakura Stream catchment discharging to the Manukau Harbour. Source - Auckland Council GIS





Figure 5: Indicative development area falling south-west. Source - Auckland Council GIS

The development proposes to manage stormwater entering the development site from the east via the existing/formed stream/channel to receiving wetlands. Wetland 4 discharges flow to the south-west and wetland 1 to the north, refer figure 6.

The SMP report indicates that on-site attenuation, including for the 1 in 100-year stormevent, will mitigate the diverted runoff to the upstream Old Wairoa Road stormwater sub catchment. The proposal diverts the increased catchment area to the Stage 3 Awakeri Wetland Channel, indicating no increase in flows or water levels, as flows from the increased catchment area are attenuated via proposed stormwater pond 4. This does not consider any risk of failure or impediments in the flood corridor during a significant stormevent and the cumulative effects of increased volume in the event of blockage or backwater occurring.



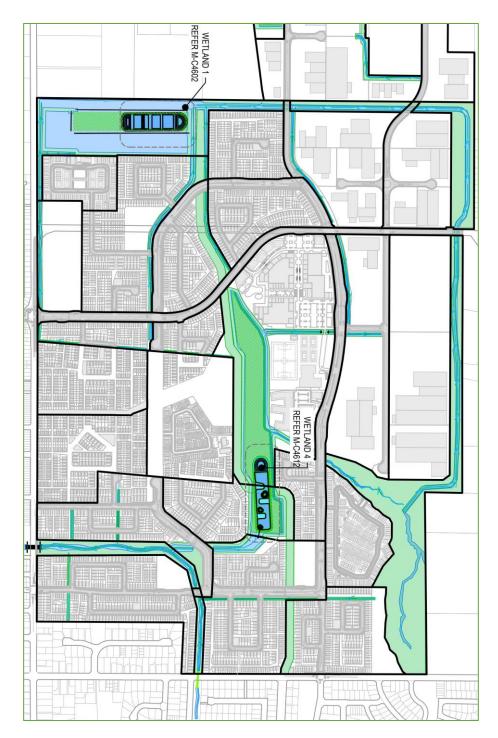


Figure 6: Stream/channel overview. Source - https://www.fasttrack.govt.nz/ data/assets/pdf file/0021/3936/10.-Sunfield-Engineering-Plans part-q.pdf

However, beyond the development site, any failure in the existing upstream Old Wairoa Road sub catchment, and the wider Pāhurehure Inlet catchment, stormwater network and flood management corridor, for the 1 in 10- and 100-year stormevent, will be, at worst case, potentially catastrophic to properties within proximity to the flood plain, such as with an increase to the flood volume footprint following a blockage. A full risk assessment has not been addressed for the flood conveyance corridor up-to the Manukau Harbour for the proposed increase in catchment area of 81 ha which poses a significant risk in the event of failure.



Any failures, such as pipe blockages or temporary impediments to flood flow, for example blocked culverts, slips, or debris, will result in ponding and/or backwater with an increased volume of runoff beyond that of the existing catchment. Any increase in the flood footprint or levels within the upstream Old Wairoa Road stormwater sub catchment will worsen existing flood risk and effects.

Any failures in the flood corridor between the development site to discharging at Pāhurehure Inlet has not been discussed in the Stormwater Management Plan (SMP) to consider the significant increase of flood runoff area of 81 ha. Section 7 of the SMP does not raise or discuss the implications of this significant additional total runoff area, especially in the AUP E36 Objective Assessment and the Risks and Benefits sections.

On the downstream western boundary of the development site stormwater conveyance is reliant on the Cosgrave Road culvert, refer page 242 of the SMP for Healthy Waters culvert longsection. The culvert design identifies in section 2.8.4 identifies an inflow design flow of 23 m³/s with a surcharge level up to 23.8m RL. The 'post development modelled peak SWCoPv4 climate change factors flow' identified in the application is 25.3 m³/s. Culvert failure and the resultant flood impact has not been discussed.

This proposal is exacerbating a natural hazard by diverting flows outside the site's catchment and does not align with industry best practice, any existing developments and flood profile within that catchment would not have allowed for future additional volume and flows from another catchment. The effects are therefore not planned or provided for beyond the development site.

This proposal seeks to alter the natural flow of water, through both construction and drainage changes, to divert stormwater from the Ardmore sub catchment into the Old Wairoa Road sub catchment, this failure of Duty of Care may result in future action under New Zealand's Nuisance Law.

Any future unforeseeable issues will also become a future maintenance and remediation cost problem to both Auckland Council ratepayers, and landowners, within the Old Wairoa Road sub catchment receiving the diverted runoff from Ardmore sub catchment.

It has been identified that the flood corridor within the upstream Old Wairoa Road sub catchment has an existing impediment to flood flow, with the level of Cosgrave Road and the downstream channel being higher than that of the upstream channel thus causing ponding/backwater.

The development proposal seeks to resolve via a syphon system during the 100-year event to navigate Cosgrove Road elevated level, the downstream channel is also higher, how does that work in reality allowing for failure? A failure of the proposed syphon system needs to be demonstrated to identify the impact of the additional runoff that has been diverted into this catchment which will not have been accounted for in any existing approved flood mitigation.



Review of the CKL Memo, Sunfield Development – Takanini Stormwater Management - Proof of Concept Review (Rev A), dated 10 February 2025, and the Mckenzie & Co Memo, Sunfield Fast Track Application – 3 Waters Review, dated 24/01/2025, identified the following –

- Neither memo included any consideration of blockages in the western catchment flood corridor.
- CKL memo suggested consistency with Central/Local government policies and plans was indicated. However, worsening a natural hazard by diverting flows outside the sites catchment, where any existing developments within that catchment would not have allowed for future additional flows from another catchment does not align with that statement.
- Neither memo included any indication how the NDC accounts-for and caters-to flows from outside the catchment.
- CKL identified that a full assessment has not been provided to demonstrate that Awakeri and McClennan Wetlands can mitigate the diverted runoff.
- CKL identified that the effectiveness of the proposed water quality treatment has also not been addressed/presented.
- CKL noted that the findings suggest that further on-site treatment may be required. TMW note that this should be resolved prior to any works to ensure that mitigation can be suitably sized, located, and resolve ownership as if on individual lots consent notice(s) on titles will be required.
- CKL noted that the storm tide level influence has not been accounted for in the model.
- Both memo reviews suggest that an independent review of the flood model is required.
- CKL noted that the swale channel vs groundwater levels clash and need careful consideration.

In summary, detailed design assessment by Auckland Council needs to consider and address the findings of CKL and Mckenzie & Co Memos. A risk assessment of an additional 81 hectares of flow in the Pāhurehure Inlet catchment needs to be considered for any unforeseen failure in the flood corridor during the 1 in 100-year stormevent, and the potential issues in an extreme stormevent.

Yours Sincerely,

Rose Mason Principal Three Waters Engineer | Kaipūkaha Mātāmua Metarahi m. (+64) 21 300 803 e. rose@temirowater.co.nz

Te Miro Water Consultants Ltd.

SCHEDULE THREE: TRANSPORTATION

3 July 2025

25-616

Nigel Hosken

Hosken and Associates Ltd

Dear Mr Hosken

Winfield Fast Track Application Ardmore

As requested I have reviewed the application by Winfield for the fast track development at Ardmore.

The Integrated Transport Assessment is predicated on achieving a very low level of car use through parking limits on the development. This assumption has resulted in estimates of very low levels of additional traffic on the road network and modest traffic effects. I see two problems with this approach. The first is they would need to achieve trip generations that are lower than anywhere I have ever surveyed and lower than the existing Central Area. That appears to be overly ambitious given the lack of employment within walking distance and the lack of options for travel including public transport. The proposed private bus might go some way towards providing an alternative, but again I consider the goal overly ambitious. The second issue is the impact the parking constraints will have on surrounding areas where there is parking available for residents and visitors. I would expect that any free parking space within quite a distance would become used as an alternative parking area for this development.

To put the trip rates proposed in context, the goal is to generate 0.1 to 0.16 vehicles per dwelling in the peak hour. Traditional residential housing in the area would have a trip rate closer to 0.8 trips per household.

These are the main traffic issues that arise from the application documents:

• The assumed traffic generation is extremely low. It is lower than would normally be used for a residential development in the area and lower than might be used even in the Auckland CBD where there are jobs and activities within walking distance and where there is very good public transport. Surveys of Westminster Court, (an apartment complex in Central Auckland) show it generates 0.16 trips per household in the morning peak and 0.24 trips per household in the evening peak.



- The applicant is relying on parking constraint to achieve the extremely low trip rates. That could only work if there is a hard limit on parking in the entire precinct and in the areas surrounding the precinct where people might be able to park and walk to the precinct.
- We could expect any visitor parking in neighbouring areas to become de-facto parking for this precinct. Anyone using alternative parking means the low trip rate will not be achieved, instead trips will simply impact on neighbouring areas.
- There is the possibility of paid parking being made available within the precinct or adjacent to the precinct as a result of market demand.
- No sensitivity test has been carried out to demonstrate what will happen if the low trip rates are not achieved.
- The levels of service modelled at key intersections suggest there is little scope for the road network to cater for higher levels of traffic unless further road widening occurs. There are five instances where the degree of saturation exceeds 0.95, five turns where the Level of Service is F and 17 places where the queue exceeds 100m. Intersections at Dominion Road with Papakura-Clevedon Roads and the future Airfield Road with Mill road will quite clearly be overloaded.
- The assumed bus route could theoretically cater for commuter trips to and from work but this does not allow for travel to shops or recreational activities located away from the Frequent Transport Network.
- The additional level of delivery or service traffic required to service a residential area
 where almost everything has to be delivered to homes because cars are not available
 should be considered including the impact that additional service traffic would have on the
 road network.
- Is a low car ownership rate of 0.1 cars per household realistic in an area where the current average is 2.48 cars per household (neighbouring Takanini East is 2.19 cars/HH) and where the Auckland average is 1.9 cars per household?
- The analysis assumes every job in the area is carried out by a person living in the area. The
 current jobs in the Ardmore Statistical area actually generate trips from a much wider area
 as shown in by the 2023 Census (Figure 2).

If the development were to proceed then there would need to be very strict conditions to prevent an increase in parking occurring once enough houses had been built for the parking problem to become apparent. This would need to be a fixed limit on parking spaces within the entire precinct. This would then likely impact the neighbouring area, as residents would simply park there.





John Parlane BE(Civil), BApplEcon, CM Eng NZ

Consulting Traffic Engineer

Parlane & Associates Ltd

Census year: 2023											
Total household income: Total - total	al ba	aucobold incom									
			e								
Tenure of household: Total - tenure	of	household									
Number of motor vehicles		No motor	One motor	Two motor	Three motor	Four motor	Five or more	Total stated -			
		vehicle	vehicle	vehicles	vehicles	vehicles	motor vehicles	number of			
								motor vehicles	Housholds	Cars	Cars/HH
Area											
Auckland		33,912	155,046	195,291	68,772	28,437	15,516	496,977	496,974	943,272	1.9
· Takanini East		21	174	447	150	81	24	897	897	1,962	2.1
· Ardmore		0	57	156	81	48	18	363	360	894	2.4
Waitematā Local Board Area		9,786	14,358	6,945	1,647	549	327	33,612	33,612	37,020	1.1
Papakura Local Board Area		1,188	5,523	7,791	2,889	1,248	621	19,260	19,260	37,869	1.9
Franklin Local Board Area		729	6,723	11,154	4,668	2,124	1,323	26,724	26,721	58,146	2.1
Terms & conditions											
Number of motor vehicles, total hor	ucok	ald income an	d tonuro of hou	cobold for bou	coholds in occur	aind private du	ollings /DC TAL	D CA2 Hoolth)	2012 2010 -	md 2022 (

Figure 1 Car Ownership 20923 from Stats.govt.nz with three columns at right calculated.

(Assumes households with 5 or more cars have exactly five).



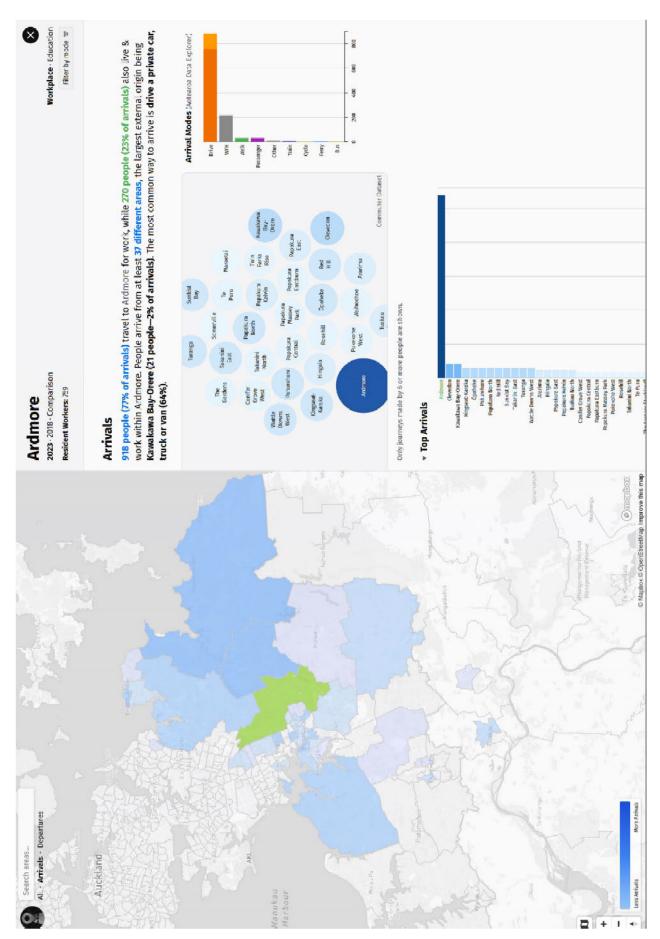


Figure 2 Origins of Work Trips to Ardmore 2023 Census (Commuter Waka)

