



DOIA21/22050742

s 9(2)(a)

Dear s 9(2)(a)

Thank you for your email dated 18 May 2022 requesting the following information under the Official Information Act 1982 (the Act):

*Under the Official Information Act I request the following information:*

- All correspondence to and from Sunfield employees relating to the Ministry's information gathering on Sunfield.*
- All correspondence to and from Kainga Ora employees relating to the Ministry's information gathering on Sunfield.*
- All correspondence to and from Treasury employees relating to the Ministry's information gathering on Sunfield.*
- All correspondence to and from Auckland Council employees relating to the Ministry's information gathering on Sunfield.*
- All correspondence to and from local iwi relating to the Ministry's information gathering on Sunfield.*
- Your Ministry's assessment and analysis of the pros and cons of the proposed Sunfield project. This could include information contained internal email correspondence, instant messaging tools such as Microsoft Teams, meeting notes, draft briefings, working documents, and such like.*

Your request for all correspondence to and from Sunfield employees has been interpreted as seeking all correspondence to and from employees of Winton, who are the developers of Sunfield.

As Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development did not conduct its own evaluation of the project (this occurs only if a project is selected for assessment, which is the responsibility of Kāinga Ora – Homes and Communities), the volume of information identified that fit your criteria was necessarily limited.

Four emails and two documents have been identified as in scope of your request. Three emails and one document are withheld in full under section 9(2)(g)(i) of the Act, to maintain the effective conduct of public affairs through the free and frank expression of opinions by or between or to Ministers of the Crown or members of an organisation or officers and employees of any public service agency or organisation in the course of their duty.

The remaining email and document are released to you with mobile phone numbers and email addresses withheld under section 9(2)(a) of the Act, to protect the privacy of natural persons.

This information is summarised in the document schedule below.

In terms of section 9(1) of the Act, I am satisfied that, in the circumstances, the decision to withhold information under section 9 of the Act is not outweighed by other considerations that render it desirable to make the information available in the public interest.

You have the right to seek an investigation and review of this response by the Ombudsman, in accordance with section 28(3) of the Act. The relevant details can be found on the Ombudsman's website [www.ombudsman.parliament.nz](http://www.ombudsman.parliament.nz).

As part of our ongoing commitment to openness and transparency, the Ministry proactively releases information and documents that may be of interest to the public. As such, this response, with your personal details removed, may be published on our website.

Yours sincerely

A handwritten signature in black ink, appearing to read 'F. McCarthy', written in a cursive style.

Fiona McCarthy  
**Manager Policy and Legislation Design**

## Document schedule

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DOIA21/22040723 Documents in scope			
	Date	Title	Section of the Act applied
1.	27 January 2022 10:03 AM	FW: Sunfield Materplanned Community Overview	9(2)(a)
2.	4 March 2022 8:39 AM	For review: Advice to Joint Ministers on Sunfield Advice	Withheld under 9(2)(g)(i)
3.	17 March 2022 9:37 AM	RE: Sunfield. confidential and legally privileged	Withheld under 9(2)(g)(i)
4.	24 March 2022 2:55 PM	RE: For review: Advice to Joint Ministers on Sunfield Advice	Withheld under 9(2)(g)(i)
5.		Additional information on Sunfield development	N/A
6.		Extra information on Sunfield	Withheld under 9(2)(g)(i)

**From:** [Fiona McCarthy](#)  
**To:** [Ben Richards](#); [Felicity Thurston](#)  
**Cc:** [Ben Wauchop](#)  
**Subject:** FW: Sunfield Materplanned Community Overview  
**Date:** Thursday, 27 January 2022 10:03:24 am  
**Attachments:** [image001.png](#)  
[Letter to Fiona McCarthy\\_26 January 2022\[1\].pdf](#)

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FYI

Fiona

[UNCLASSIFIED]

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**From:** Chris Meehan <s 9(2)(a)>  
**Sent:** Wednesday, 26 January 2022 5:59 pm  
**To:** Fiona McCarthy <Fiona.McCarthy@hud.govt.nz>  
**Cc:** Simon Ash <s 9(2)(a)>  
**Subject:** Sunfield Materplanned Community Overview

Dear Fiona,

Please see attached outline of our consultant reports per our discussion a week or so ago. Also following for your convenience, is the link to the UDA Application for the Sunfield development, which was submitted in October 2021:

[UDA Application - October 2021](#)

We are available at any time convenient if you would like to discuss the contents further.

Please confirm receipt of this email.

Best regards,

Chris.

**Chris Meehan**

CEO

**WINTON**

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# WINTON

26 January 2022

Fiona McCarthy  
Ministry Housing and Urban Development  
**Via email: [fiona.mccarthy@hud.govt.nz](mailto:fiona.mccarthy@hud.govt.nz)**

Dear Fiona

## **Sunfield Masterplanned Community Overview**

Further to our recent telephone conversation, the purpose of this note is to provide an overview of the Sunfield masterplanned community located in Papakura, Auckland. Specifically to provide:

- An overview of the Sunfield masterplanned community and the design principles which formed the basis for its development.
- Details of the consultants who are engaged on the project and the findings of the reports they have prepared to date.
- Details of the mana whenua and iwi engagement which has been undertaken to date.

## **Section 1: Overview of the Sunfield Masterplanned Community**

Sunfield, a community master-planned around people, not cars. **A New Zealand first, it is designed to set a bright, sustainable future for its residents and not to repeat Auckland's town planning mistakes of the past.**

Sunfield is a 15-minute sustainable neighbourhood across 221 hectares of contiguous land which upon completion will comprise:

- A community designed to enable "car-less" living.
- 5,000 healthy homes, consisting of 4,400 individual homes and 3 retirement villages of approximately 600 independent living units and care beds.
- 250,000 sqm of employment, healthcare and education buildings.
- A 4 hectares of town centre retail and community buildings.
- 2 schools.
- A further 4 retail hubs located throughout the community.
- Permanent jobs for over 11,000 people.
- 22.8 hectares of open spaces, green links, recreation parks and reserves and ecological offsets.
- An extensive restoration and native planting of the core stream and wetland network.
- The establishment of the Sunfield renewable solar energy network for the community.
- The Sunbus autonomous electric shuttle fleet.

Sunfield sits between the rapidly urbanising and expanding neighbourhoods of Takanini and Papakura, with Ardmore Airport to the east. There are direct connections back to the main centres of Takanini and Papakura. Papakura Station is just 2km from Sunfield, providing a direct connection to the Auckland public transport network and enabling a low impact and sustainable lifestyle without leaving Auckland.

When considering the development of Sunfield for urban growth, an understanding of the social context and acknowledgment of the constant change that occurs around the way we live, how we want to live, and how we 'should' be living was an essential step in establishing a series of design principles that have

guided the development of the Sunfield concept master-plan. These design principles, include consideration around questions of local identity, changing demographics, provision of diverse housing options, and addressing environmental imperatives relating to resilience, sustainability, low carbon, and biodiversity loss, among others. The eight core Sunfield Design Principles are:

- Principle 1: Enable Car-less Living;
- Principle 2: Live Local;
- Principle 3: Work Local;
- Principle 4: Kaitiakitanga;
- Principle 5: Low Impact and Sustainable;
- Principle 6: Just Transition;
- Principle 7: Connected with the Environment, biodiversity; and
- Principle 8: Diverse Lifestyle Choices.

With the Government's decision not to proceed with the Mill Road Upgrade, Winton and the design team were presented with an opportunity to explore a new approach to development that moves away from a reliance on private motor vehicles towards a future thinking, people centric collection of liveable neighbourhoods. This approach has unlocked a number of opportunities that will lead to healthier and more sustainable outcomes now and the future. Meeting the needs of our communities requires that the Sunfield concept master-plan considers all aspects of life and integrates housing, employment opportunities, amenity and open space, as we, in turn, look to our neighbourhoods to become more self-sufficient and provide for higher standards of living in compact ways.

The 15-minute sustainable neighbourhood is a concept that serves as an organising principle for urban development and urban life. The neighbourhood is designed to provide residents access to most, if not all, residents' needs within a short walk or bike ride from their home, including schooling, employment, medical services, restaurants and bars, recreational spaces, retail, and food supplies. Life is more liveable for residents so they can live and work locally, increasing their quality of life with better air quality, safer neighbourhoods that are quieter, more diverse, inclusive, economically vibrant and not reliant on cars.

Considering transport and buildings together through the process has been integral to the design of the Sunfield concept master-plan. By focusing on people not cars, Sunfield will enable car-less living by the innovatively designed concept master-plan which removes the challenges usually incurred in leading a car-less lifestyle, while improving residents' quality of life. Using ground-breaking technology for transport, residents will be able to jump on a Sunfield autonomous electric shuttle that runs continually to link with the train station, the central Sunfield Village, small neighbourhood hubs, and will stop anywhere in between. This approach will be supported by dedicated bus and bike lanes, wider footpaths, limited carparking on-site and shared vehicles for those times when car use is unavoidable.

Without the requirement for extensive roading and individual garaging in the development, more space is freed up for warmer, drier homes in Sunfield. As stated by the Climate Change Commission in its final advice, "increasing the number of warmer, drier homes and improved house design could improve people's health and improve health equity. Warmer, drier homes can have significant health benefits for those people on low incomes, including increased comfort, reduced time off school or work, fewer GP visits, fewer hospital admissions for circulatory and respiratory illnesses, reduced pharmaceutical costs, and reduced mortality.<sup>1</sup>"

**Unfortunately, we feel that the prescriptive nature of the c30 year old Resource Management Act is simply not equipped to deal with such a comprehensive, forward-thinking proposal, which is why we have applied for planning consideration under the more enabling, forward-thinking Urban Development Act.**

<sup>1</sup> Paragraph 162, page 164 of "Ināia tonu nei: a low emissions future for Aotearoa", Climate Change Commission Advice to the New Zealand Government on its first three emissions budgets and direction for its emissions reduction plan 2022-2025, dated 31 May 2021.

Section 2: The Sunfield Consultant Team and Commentary on the Reports Prepared to Date

Consultant	Commentary on Reports Prepared to Date
<b>Studio Pacific Architecture</b>	<p>Studio Pacific Architecture have prepared the Sunfield concept masterplan. Please refer to the document entitled Sunfield Masterplan Community – Concept Master-plan, which accompanies this note and provides details of:</p> <ul style="list-style-type: none"> <li>• Design principles;</li> <li>• Key spatial moves;</li> <li>• Zoning and precinct plans;</li> <li>• Site context; and</li> <li>• Site analysis.</li> </ul>
<b>Tattico</b>	<p>Tattico have prepared a planning assessment for the Property. The Property represents a unique opportunity to develop a contiguous 221-hectare parcel of land into a master-planned community of scale. However, it is complicated by a number of factors which need to be dealt with in a coordinated fashion.</p> <p>A split zoning applies to the Property (being c25% Future Urban Zoned land and c75% Rural Zoned land), which under the RMA currently prevents a unified approach being adopted across the entire Property. <b>A comprehensive approach to this Property must be adopted to ensure that the full potential of the Property is unlocked and the proposed master-planned community is developed in a timely fashion.</b></p>
<b>Maven Associates</b>	<p>Maven Associates have prepared the Sunfield Three Waters Report, which details the proposed engineering and infrastructure solution for the Sunfield development. This comprehensive report has been independently peer reviewed by respected engineering from MPS and Woods. <b>All three engineering consultancies have found that the proposed engineering and infrastructure for the Property to be an appropriate and adequate solution.</b></p> <p>In arriving at their findings and preferred design, Maven Associated consulted with Healthy Waters to ensure that the design met their overall requirements.</p> <p>The report details the proposed stormwater solution for the Property as follows:</p> <p><i>A comprehensive and significant engineering solution has been developed to manage the stormwater that affects the Property. This solution takes the form of a stormwater conveyance channel and has been designed to provide an overall stormwater solution for the entire Property. The stormwater solution for the Property is an extension of the Takanini Stormwater Conveyance Channel.</i></p> <p><i>Stage 1 of the Takanini Stormwater Conveyance Channel has already been designed, consented and constructed by Auckland Council and is operational. Stage 2 and 3 of the Takanini Stormwater Conveyance Channel is to be constructed on land that is already owned by Auckland Council, which is bordered by the Property, and is designed, consented and ready for construction. While Auckland Council had scheduled stages 2 and 3 for construction in 2021, the commencement of these works was put on hold to reflect budgetary constraints due to the impact of COVID-</i></p>

	<p>19. As such, Winton proposes to undertake the construction of Stage 2 and 3 on behalf of Auckland Council and to seek appropriate development contribution offsets for undertaking these works.</p> <p>The additional stormwater augmentation for the Property is effectively 'Stage 4' of the Takanini Stormwater Conveyance Channel and has been designed on the same basis as Stages 1, 2 and 3. The Takanini Stormwater Conveyance Channel not only provides a functional / practical infrastructure solution for stormwater across the entire Property but also creates a quality public asset in the form of an attractive public space including a board walk network along the edge of the channel.</p> <p>Auckland Council's budgetary constraints are well documented, and once again the COVID-19 pandemic and continuing lockdowns, only exacerbate this issue (with a first-hand example provided above). Winton has the experience and financial capability to undertake infrastructure works on behalf of Auckland Council which will provide relief to the immediate budget constraints the Auckland Council is experiencing and will ensure that the Property is developed in a timely fashion.</p> <p><b>Maven Associates have completed the full engineering design of the stormwater solution detailed above. The stormwater solution has been costed and Winton has the financial capability to commence this work immediately.</b></p> <p>Additionally, Maven Associates have confirmed that there is sufficient capacity in the wastewater, water and power trunk infrastructure to service Sunfield. <b>It is extremely very rare within Auckland for there to be sufficient capacity within the existing infrastructure to service such sizeable greenfield parcels of land that are located close to an existing railway station.</b></p>
<b>Lander Geotechnical Consultants</b>	<p>Lander Geotechnical have prepared a Geotechnical Assessment for the Property. The assessment concludes:</p> <p><i>Overall, it is considered that the Sunfield landholding is considered suitable for urban intensification as has been done on other land holdings to the east and south in similar geologies, and <b>we therefore support the rezoning of the Property to allow the proposed development.</b> However, there are several unique geotechnical issues that can be addressed with appropriate engineering design and construction and resolved (where required) in due course through appropriate design methodologies, commensurate with development and earthworks plans as part of the resource consent process.</i></p>
<b>Clough and Associates</b>	<p>Clough and Associates have prepared an Archaeology Assessment for the Property. This assessment has been fully peer reviewed by CFG Heritage. The assessment concluded:</p> <p><i>No recorded archaeological sites are located in the Project Area and no additional sites were identified during the survey for this preliminary assessment. Based on the preliminary assessment, <b>there should be no major constraints on future development on archaeological grounds</b>, as no known archaeological sites will be affected, and the possibility that archaeological remains may be present can be appropriately mitigated through the provisions of the HNZPTA.</i></p>



<p><b>Natural Knowledge / Dr Peter Singleton</b></p>	<p>Dr Peter Singleton prepared a Land Use Capability and Soil Assessment. This assessment has been fully peer reviewed by Dr Reece Hill of Land Systems. The assessment concludes:</p> <p><i>The site was predominantly LUC class 2 land with some LUC class 3 land. Most of the soils had drainage issues and additional limitations such as clay, acid conditions, subsidence or rolling slopes. Because of these limitations <b>they were assessed as productive soils but not Elite or Prime land</b>. This land was 89.7 % of the area.</i></p>
<p><b>Styles Group – Acoustic and Vibration Consultants</b></p>	<p>Ardmore Airport is located on the eastern boundary of the Sunfield development, and the High Aircraft Noise Area (HANA) noise contours overlay the Property. These noise contours were determined recently under the Auckland Unitary Plan. A key requirement when developing the Sunfield concept master-plan was to ensure that only appropriate activities are undertaken within these noise contours.</p> <p>A portion of the Property is impacted by the “high aircraft noise area” (HANA) classification under the AUP. This seeks to prohibit noise sensitive activities on the flight paths into, in this case, Ardmore Airport. As an example, a significant area of employment land is located within the precinct in the specific location of the HANA.</p> <p>It should be noted that <b>the Sunfield concept master-plan works within the existing constraints associated with the Ardmore Airport noise contours and that Winton is not proposing any changes to these noise overlays.</b></p>
<p><b>Commute Transportation Consultants</b></p>	<p>Commute Transportation Consultants completed a Transportation Assessment for the Property. This assessment has been peer reviewed by Flow Transportation Specialists. The assessment concludes:</p> <p><i>Sunfield Developments Limited is proposing to rezone a parcel of land to allow the development of the Sunfield masterplanned community. Sunfield is designed to be a 15-minute sustainable neighbourhood to provide <b>residents access to most, if not all, resident needs within a short walk or bike ride from their home, including schooling, employment, medical services, restaurants and bars, recreational spaces, retail, and food supplies</b>. Sunfield is designed on eight core principles, with the most fundamental principle being to enable ‘Car-less living’. Critical to this are:</i></p> <ul style="list-style-type: none"> <li>○ <i>Significant limitations in the number of cars on the site (generally 10% of a more standard development),</i></li> <li>○ <i>Provision of frequent and privately funded public transport system linking both internally within the site and the wider network (including town centres and major train stations), and</i></li> <li>○ <i>Encouraging active transport modes through reduction in car ownership.</i></li> </ul> <p><i>It is recognised that this development is essentially a first for New Zealand. As a result, it is considered that carefully monitoring of initial stages of the development is needed to ensure the measures proposed have the desired result of significantly reducing private car travel (both internal and externally).</i></p>

	Sunfield offers a strategic location for urban growth which benefits from being under 2km from the suburban rail network southern line of the Papakura station and Takanini station.
<b>Focus Environmental Services</b>	<p>Focus Environmental Services completed a Preliminary Site Investigation for the Property. The report concludes:</p> <p><i>Based on the information available, it is considered that with appropriate management of the site soils, <b>the proposed rezoning of the Property to allow the proposed development can occur without adverse environmental or human health effects.</b></i></p>
<b>Lightforce</b>	<p>Energy efficiency is a core part of the Sunfield vision, building healthy homes and buildings requiring less heating and utilising technology to enable residents to live smarter, demanding less electricity. <b>Prioritising clean and affordable energy, most of the energy requirements of Sunfield will be filled with onsite solar power throughout the community.</b> Winton has partnered with Lightforce to create the Sunfield renewable energy strategy for the master-planned community.</p> <p>Lightforce is a tech driven New Zealand residential and commercial solar installation and energy retailing business. Having completed over 6,000 installs to date, Lightforce is currently the most experienced solar installer in New Zealand. Lightforce installs around 20% of the country's solar systems month-on-month. The Sunfield renewable energy strategy is enabled by solar throughout the community. Every home and shared amenity is to be connected with a mini-grid system to an electricity storage facility. Covenants will be placed on the title of each property to require solar panels to be installed on the roof of each home and building constructed within Sunfield.</p> <p>Sunfield Solar will be linked to the national grid for times of surplus and deficiency. During peak generation periods, surplus energy will be created and contribute more than 3.7m kWh to the national grid over the course of a year. During times of low solar generation and high energy demand, Sunfield will be able to charge electricity storage facilities from the national grid during off-peak times, minimising the burden on national transmission infrastructure. The Sunfield Solar system reduces electricity costs for residents, minimises the burden of New Zealand's transmission infrastructure and avoids more than 3,000 tonnes of greenhouse gas emissions per year (based on April 2020 – April 2021 year), the equivalent of planting 140,000 trees per year.</p> <p><b>Sunfield Solar developed by Lightforce has been peer reviewed by Y.E.H Renewable Energy Consultants and Geoghegan Consulting who both found that the concept was feasible and appropriate for the development.</b></p>

### Section 3: Details of the Mana Whenua and Iwi Engagement Undertaken

Winton has engaged Tiumalu Peter Fa'afiu of Navigator Limited to lead the engagement with mana whenua and local iwi as it relates to the Sunfield development. Navigator has experience in diverse sectors and communities in New Zealand and the Pacific Region. Winton has engaged Navigator as it is fundamental to ensure that the Sunfield development best reflect the cultural values and aspirations of the mana whenua and local iwi. This is consistent with the inherent concept of Kaitiakitanga adopted in the Sunfield development and the focus on connecting with the natural environment.

**The mana whenua and iwi engagement commenced in quarter 3 2021 as part of Winton's due diligence to purchase the Property, with in excess of 30 hui being held to discuss the Property and the project.**

To date, Winton and Navigator have undertaken best practice and authentic preliminary engagement with mana whenua, local iwi and Māori organisations within the Papakura / Ardmore area. The preliminary engagement was undertaken at the commencement of the Sunfield development process to ensure that the technical workstreams that are currently being undertaken would align.

The first task of the Navigator process was "Identification of Interest in Project Area". This also entailed Navigator understanding Winton's project objectives for engagement and capacity to reflect any feedback from iwi.

In March 2021, Navigator contacted 19 iwi of Tamaki Makaurau / Auckland. The 19 iwi are those identified by Auckland Council. Auckland Council, through other development projects and under the Auckland Unitary Plan, also identified 10 iwi who were regarded as having mana whenua status in "Southern Auckland". The purpose of contacting the 19 iwi was to ascertain the following in relation to the Sunfield development – "Yes, our iwi has an interest in the Sunfield development", "No, our iwi has no interest in the Sunfield development", or no response was received from the initial contact.

Six iwi expressed an interest in the Sunfield development after the initial engagement. These iwi are:

- Ngai Tai ki Tamaki;
- Ngati Te Ata Waiohū;
- Ngati Tamahō;
- Te Akitai Waiohū;
- Ngati Paoa; and
- Ngaati Whanaunga.

Of the six iwi, there is a shared consensus among the group that Ngai Tai ki Tamaki has the strongest historical and cultural connection to the land area of Ardmore, where the Sunfield development is situated.

In addition to the above, Navigator contacted and subsequently met with Tony Kake, CEO of Papakura Marae, which is the most influential Māori organisation and mātāwaka (urban Māori/Māori who don't belong to a mana whenua iwi) entity in the area of the Property. Tony Kake is interested in Sunfield particularly the employment opportunities for locals. He also reaffirmed he was not mana whenua however had strong working relationships with all six iwi. All six iwi were informed that Winton would approach Papakura Marae and all felt the approach was appropriate. A link to Tony's public endorsement of the project is here: <https://www.youtube.com/watch?v=uJQcDJHZf0E&t=68s>

The second task of the Navigator process was to review all information available relating to previous mana whenua engagement and historical Cultural Values Assessments ("CVA") and Cultural Impact Assessments ("CIA") from all iwi groups in the area such as - Drury, Opaheke, Papakura, Drury West. The output was a summation of relevant findings from the historical CVA's and CIA's which was provided to Winton and the Sunfield consultant team to ensure that previous learning would be incorporated into

the Sunfield development. These findings also provide the framing for future discussions with the six iwi on the Sunfield development to ensure consistency and appropriateness of feedback from those iwi.

Thirdly, "Opening Hui" have been held with each of the key iwi leader / stakeholder / kaitiaki manager of the six iwi who expressed an interest in the Sunfield development. The purpose of the individual Opening Hui was for Winton to meet with the respective iwi representatives and for all parties to obtain a broad understanding of the Sunfield development and Winton's objectives and outcomes for the project. Winton is also conscious of the capacity challenge of iwi to engage with developers so the initial hui provided a 'specific contact point' for Sunfield going forward.

Fourthly, further "Project Update Hui" have been held with each of the key iwi leader / stakeholder of the six iwi who expressed an interest in the Sunfield development. The purpose of the individual Project Update Hui was for Winton to provide an update to the respective iwi in relation to the Sunfield Design Principles, the Sunfield concept master-plan and the direction that the development was taking following the Government's decision not to proceed with the Mill Road Upgrade.

Winton is committed to continued best practice engagement with the six iwi who have expressed interest in the Sunfield development and will continue to be guided through this engagement by Tiumalu and the wider Navigator team. This will be particularly important given the change in planning direction (being UDA Part 2 rather than under the Resource Management Act), of which a number of the iwi have yet to experience. The following engagement will continue over the coming period:

- Site walkovers.
- Collective Hui / additional individual engagements as required.
- Regular communications (e.g. email, phone) on progress.
- Confirmation, commissioning, and production of CVA's and CIA's.
- Production of Mana Whenua Engagement Report by Navigator for rezoning and consenting applications.
- Production of relevant written correspondence (e.g. Hui Minutes, contact log) to showcase the 'continued best practice engagement'.

#### Conclusion:

Winton have spent circa 18 months and many millions of dollars ensuring that a broad panel of independent experts agree that the Sunfield proposal is both workable and able to be delivered without requiring an injection of public funds.

Winton is a capable and experienced New Zealand-owned residential land developer who has significant expertise in delivering projects of this scale.

**We simply seek admission into the UDA process, during which we accept that all of our designs and consultant reports will be fully examined and further peer reviewed as well as further public consultation take place as part of this consent pathway's process.**

**We reiterate that we don't believe that the 30 year old RMA can provide a consent pathway for a forward-thinking project like Sunfield.**

We look forward to hearing from you further.

Best regards,



Chris Meehan

## **Additional information on Sunfield development**

### **Purpose of this document**

This document provides background information on the proposed Sunfield development. Content is primarily sourced directly from provided documentation – HUD's view is only where indicated.

HUD is not in a position to evaluate the extent to which the project aligns with government priorities.

### **Description of project**

Winton describes the proposed project as follows:

Sunfield is a 15-minute sustainable neighbourhood across 221 hectares of contiguous land which upon completion will comprise:

- A community designed to enable "car-less" living.
- 5,000 healthy homes, consisting of 4,400 individual homes and 3 retirement villages of approximately 600 independent living units and care beds.
- 250,000 sqm of employment, healthcare and education buildings.
- A 4 hectares of town centre retail and community buildings.
- 2 schools.
- A further 4 retail hubs located throughout the community.
- Permanent jobs for over 11,000 people.
- 22.8 hectares of open spaces, green links, recreation parks and reserves and ecological offsets.
- An extensive restoration and native planting of the core stream and wetland network.
- The establishment of the Sunfield renewable solar energy network for the community.
- The Sunbus autonomous electric shuttle fleet

### **Purpose of SDPs**

SDPs were designed to enable complex and strategically important urban development projects through:

- Better coordination of land use, infrastructure, and public and private investment
- Providing both the planning tools and powers to consult and implement a holistic approach to urban development, including via a single approval process
- Balancing the need for urban development with other considerations, particularly environmental outcomes

### **Is Sunfield suited to be a specified development project?**

*What benefits do Winton see in Sunfield being an SDP?*

Winton believes that the best process to rezone the Property is through the UDA and not through the normal Auckland Council Private Plan Change process (progressed via the RMA). Winton has said:

- “...Winton’s desire to achieve a specific, and very different, outcome in relation to transportation in general and a reduction in use of private motor vehicles in particular. The UDA process better enables a focus on that specific desired outcome than the standard RMA council process”
- “The second reason relates to timeframes and delays inherent in the standard RMA council process. Under the UDA, process appeals are limited to appeals on points of law... Sunfield may achieve its proposed outcomes much more quickly under the UDA process than under the standard RMA council process”.

Winton has also said that multiple regulatory tools will be needed to enable the Sunfield development and that a streamlined approach would be beneficial:

- “A litany of consents and approvals from numerous agencies under various legislation are required to bring Sunfield to fruition – these include the RMA, the Public Works Act 1981 and the Local Government Act 1974. A streamlined and integrated approach to the consenting of the Sunfield development...would enable Kāinga Ora to implement real and tangible benefits [and] enable the delivery of homes immediately”.

Limited information is provided on which other tools are required or why, with the exception of development contributions, which Winton has said it would seek for some:

“the Sunfield development will...fund and undertake the implementation of Stage 2, 3 and 4 of the Takanini Stormwater Conveyance Channel, noting that Winton would seek development contribution offsets where appropriate for completing this work...”

Development contributions are a fee councils charge for new developments to contribute to the costs of building necessary infrastructure, reserves or community facilities, authorised under the Local Government Act 2002. The Urban Development Act also enables Kāinga Ora to charge development contributions, as if it were a territorial authority, subject to some limitations (including that territorial authorities are not also charging contributions for the same infrastructure, reserve or community facility).

It is unclear what the catchment area would be for these development contributions, or the extent of what the charges may be required. This would require Winton and Kāinga Ora to work in partnership, and in consultation with Auckland Council.

#### *What has Kāinga Ora said?*

In its evaluation, Kāinga Ora stated the following:

“...The Proposer has also not explained why any of the more traditional RMA processes could not be utilised by the Proposer to establish the suitability of the site for residential-led mixed urban development, or why the UDA/SDP process would be quicker.

“a partnership with Kāinga Ora as anticipated by the UDA may add complexity and uncertainty to a project that generally appears well suited to the traditional RMA authorisation pathways”

The Proposer has also not taken up Kāinga Ora officer’s invitation that engagement be undertaken with Auckland Council prior to Kāinga Ora making its s 29(a) decision.

#### *What is HUD’s position?*

- The heavy emphasis on consenting timeframes does not align with the purpose of SDPs or their benefits
- If the primary concern is RMA timeframes, there are other tools available

### *Partnership*

SDPs are designed to be developed and implemented in partnership. As development is complex and competing aims need to be worked through, SDPs will ultimately be successful based on how effectively parties involved work together.

In this regard, there is evidence that Winton has not to date approached the project with the appropriate spirit of partnership in mind. It refused Kāinga Ora's offer to meet with the Auckland Council – an important partner in any SDP that results. It also chose not to provide additional information to Kāinga Ora to support the decision-making process.

### **Summary of Kainga Ora's decision**

Ultimately Kāinga Ora decided not to progress the proposal for assessment as a potential SDP under section 29. A press release from Kāinga Ora on its decision included the following reasons to support its decision to not progress the project<sup>1</sup>:

- Kāinga Ora does not consider it would be able to add value to the proposed development utilising the powers available under the UDA.
- A partnership with Kāinga Ora "may add unnecessary complexity and uncertainty"
- Kāinga Ora had specific concerns about aspects of the development (such as the infrastructure required) that could only be resolved in consultation with other parties
- Concerns that the proposal does not align with the purpose and principles of the UDA;
- Misalignment regarding the expected timeframes for progressing the proposal as an SDP between the proposal and what Kāinga Ora can offer as a partner; and
- That partnering with Kāinga Ora under the UDA will not lead to reduced timeframes and complexity for progressing the project.

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<sup>1</sup> <https://kaingaora.govt.nz/news/sunfield-development-not-selected-by-kainga-ora/>