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25 February 2026

Expert Panel

Sunfield Substantive Application under the Fast-track Approvals Act

Dear Expert Panel

As the Expert Panel is aware, Navigator Limited have engaged with six iwi authorities in relation the Sunfield masterplanned community. Using that experience, we wish to provide comments on the comments received from Te Aakitai Waiohua in relation to the draft Sunfield conditions.

- The draft conditions, in their totality, already provide the opportunity for Te Aakitai Waiohua to showcase their special relationship with the site and area.
- A key common message over the years of mana whenua engagement on Sunfield has been that the Applicant should provide equal opportunity as a matter of inclusivity. It is up to each iwi authority how they take up that opportunity within the framework of the conditions.
- The conditions in their totality, including Conditions 20 and 21, provide for individual engagement. This is based on the respective interest and capacity of each mana whenua group.
- As detailed within the conditions, the Mana Whenua Consultative Group (MWCG) is an avenue for continued constructive engagement by the Applicant with the six iwi authorities but it is also an avenue for inter-iwi engagement on matters of cultural value in relation to Sunfield. Condition 21 allows for inclusivity, not exclusivity, on matters of cultural importance.
- The MWCG is an opportunity for Te Aakitai's iwi representative to make known their wish to take the lead responsibility for cultural induction, cultural monitoring, and accidental discovery protocols across the stages of the site. That will allow a pragmatic and open korero among each of the iwi representatives rather than the lead responsibility being dictated through the conditions via the Fast-track Approvals Act process.
- The conditions as drafted provide Te Aakitai an avenue to make known their special relationship to the site and to directly express with the Applicant how that might be acknowledged.
- The cultural related conditions identifying six iwi authorities aligns with the Applicant's preference to provide equal opportunity or platforms for the six iwi authorities. The equal opportunity provision also recognises the efforts of all 16 iwi representatives across those six authorities who have engaged on Sunfield.

- Te Aakitai's key concern is that some of the cultural related conditions do not differentiate between it and other iwi given their special relationship with the rohe / area. The conditions provide for Te Aakitai Waiohua to raise awareness to the Applicant, technical advisors, Council officers, and other iwi authorities in an open way within the Group and individually.
- Amending those specific conditions to one iwi authority will, from experience, raise concerns from other iwi authorities about the lack of equal opportunity to express their own iwi-specific cultural values. That would in turn put both the Applicant and Council in a difficult position with the other five especially those who have provided cultural values assessments / cultural impact assessment expressing their whakapapa to the site and area.

Ngaa mihi, nui

A handwritten signature in black ink, appearing to read 'P. Fa'afiu', written in a cursive style.

Tiumalu Peter Fa'afiu

Partner, Navigator Limited