



1 August 2025

Environmental Protection Agency  
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Tēnā koe,

**Re: Sunfield Fast-Track Application – Te Ākitai Waiohūa comments**

Te Ākitai Waiohūa Settlement Trust (TAWST) welcomes the opportunity to provide comment on the substantive application by Sunfield Development Ltd (SDL) for approval of resource consents under the Fast Track Approvals Act (fast-track application).

**1. Te Ākitai Waiohūa Structure**

Te Ākitai Waiohūa Waka Taua Incorporated (TAWWTI) is a not-for-profit tribal organisation that aims to promote kaitiakitanga as well as cultural and environmental values with regard to the wider needs of the community. TAWWTI represents Te Ākitai Waiohūa in matters relating to the environment, sustainable resource management and the protection of wāhi tapu. Waiohūa are the tangata whenua of this region who traversed their tribal domain (rohe) in a seasonal cycle of shared harvesting, gathering and fishing.

TAWST is the main representative iwi entity that has an interest in resource management projects in the rohe with regard to redress received for settling Te Ākitai Waiohūa historical claims. An example of this includes vesting of ownership and co-management of the remnant maunga or volcanic cones of Auckland with the Ngā Mana Whenua o Tāmaki Makaurau Collective, of which the Trust is a member.

These comments are provided by TAWST and also represent the views of TAWWTI.

**2. Cultural Values Assessment**

Te Ākitai Waiohūa provided a Cultural Values Assessment (CVA) for the original Sunfield plan change proposal when it was to be resubmitted as a Special Development Project under the Urban Development Act. This CVA outlined the deep and enduring relationship Te Ākitai Waiohūa holds with the Takaanini area, which is the heartland of our rohe. It did not include feedback on the plan change itself, as it was anticipated that further engagement would occur once the application was formally lodged with Kāinga Ora.

In preparing a CVA the main interests of Te Ākitai Waiohūa are set out:

- The recognition and acknowledgment of Te Ākitai Waiohūa and its history in Tāmaki Makaurau (Auckland);
- The opportunity for Te Ākitai Waiohūa to exercise its role as Kaitiaki in Tāmaki Makaurau;
- The ability for Te Ākitai Waiohūa to protect and preserve its interests, resources and taonga in Tāmaki Makaurau.



The area of Takaanini is of fundamental significance to the people of Te Ākitai Waiohū because it represents the significant sections of land held and transacted in the region by the paramount Te Ākitai Waiohū chief Ihaka Takaanini.

This area is culturally significant because of the relationships and associations of the people of Te Ākitai Waiohū and their culture and traditions with their ancestral land and waters. Traditionally, the area was a natural swampland utilised by Te Ākitai Waiohū for resource collection and concealing items when attacked. It is possible that the area conceals hidden archaeological items of cultural significance.

Te Ākitai Waiohū is not against development. However, when development occurs, the expectation is for restoration and enhancement of te taiao to restore the mauri and leave it in a better state than it was before the development occurred. This is particularly important where development creates adverse effects; the mitigation and remediation must be commensurate with the impacts of development.

Te Ākitai Waiohū has not prepared a CVA for the fast-track application.

### **3. Engagement on the fast-track application**

TAWST acknowledges the engagement that has occurred on the various applications and proposals associated with the Project, including the Cosgrave Plan Change, Awakeri Stages 2 and 3 Resource Consents, and the previous Sunfield Plan Change.

While Winton acknowledged the Sunfield CVA via letter in April 2024, there has been no meaningful engagement with Te Ākitai Waiohū regarding the fast-track application. An update received in November 2024 indicated that engagement with mana whenua might not occur until the new year, further delaying meaningful involvement. This lack of consultation does not reflect an understanding or recognition by SDL of the cultural significance of Takaanini to Te Ākitai Waiohū.

The fast-track application was initially lodged on 14 February 2025. There has been no genuine attempt to ensure that Te Ākitai Waiohū is fully briefed on the resource consents, including draft conditions.

TAWST acknowledge and appreciates the resourcing of a planning consultant in July 2025 to assist with the review of the fast-track application. The scale of the Project and the timeframe for comments make it very difficult for us to engage with the application material meaningfully. It should be noted that TAWST is invited to make comments on several other applications under the FTAA at the same time, affecting our limited capacity.

Te Ākitai Waiohū submitted in opposition to the Fast Track Approvals Bill 2024 (FTAB) because of the heavy emphasis on development over taiao / environment and impacts on Te Ākitai Waiohū customary rights, interests and responsibilities including iwi Tiriti o Waitangi settlement interests, and the ability for Te Ākitai Waiohū to exercise mana motuhake and kaitiakitanga within Tāmaki Makaurau is not guaranteed. A key concern was that there would not be sufficient time for Te Ākitai Waiohū to properly consider or scrutinize projects listed in Schedule 2A.

Te Ākitai Waiohū's submission to the FTAB opposed the 'listed projects' bypassing the referral process and the inability to comment on them because they were not included in the Bill and underwent a separate process with no public input. This process created a loophole for listed

projects, allowing projects to take place in areas deemed ineligible or inappropriate and without mana whenua consultation.

#### **4. Comments**

TAWST do not approve of the applicant's approach of applying the Cosgrave Plan Change CVA recommendations to the wider Sunfield development. This is not acceptable or appropriate. The Cosgrave Plan Change CVA was prepared under a different planning framework, where urban development was anticipated under the Auckland Unitary Plan as Future Urban Zone and a plan change was being sought. The wider Sunfield development is outside the Rural Urban Boundary on rural zoned land affected by extensive flooding, and a full suite of resource consents is being sought for implementing the full development.

These comments are provided as formal feedback on the fast-track application. They aim to inform detailed development plans and engagement as the Project is implemented and require ongoing and meaningful engagement with Te Ākitai Waiohū.

##### *4.1 Scale and Duration*

Te Ākitai Waiohū is concerned with the scale of the fast-track application and the level of detail that the Panel and those invited to comment are expected to review and comment on within the available timeframe. The suite of resource consents is significant in part because the operative zones (Mixed Rural and Future Urban) do not anticipate the proposed development.

The Project is larger than Hobsonville, a greenfield area that has been progressively urbanised over a period of some 15 years and which is still under development. Since development commenced at Hobsonville, there have been changes to the original masterplan and changes to the speed of construction reflecting market conditions as can be expected over a long period. However, the guiding principles for development at Hobsonville are secured in the Auckland Unitary Plan through precinct provisions. There will be no such provisions in the Auckland Unitary Plan for the Sunfield Development.

The purpose of the FTAA is to facilitate the delivery of infrastructure and development projects with significant regional and national benefits. Te Ākitai Waiohū acknowledges the benefits of increased housing supply but is concerned about the development of housing in areas subject to flooding. Development of areas affected by natural hazards does not align with sound resource management practice or te ao Māori values. Such development creates safety risks for the people that live in the area, including downstream of the Project, and does not work with te taiao to retain and restore natural processes.

There are significant risks to approving the full suite of resource consents today for the full development over 15 years. It does not reflect changes that will occur in the planning system, changes in best practice, or changes in market demand. Approving these resource consents locks development into what may be considered appropriate today but may not be appropriate in 5 – 10 years. This is evident in the fact that Auckland Council is developing a plan change to manage development in natural hazards, amending the current approach in the Auckland Unitary Plan.

##### *4.2 Flood risk*

A critical issue with the Project is the placement of urban development within a floodplain and the potential impacts on people's health and wellbeing if the engineering solution fails.

The flood risk effects are significant and out of proportion with the benefits of housing supply and employment. The Economic Assessment does not quantify the costs of flood risk or infrastructure to manage flood risk.

Te Ākitai Waiohū acknowledges the technical success of the Awakeri Wetlands for managing flooding effects. Elsewhere in the Project, stormwater runoff from a 350 ha upstream catchment is diverted around the community and attenuated. The design proposes to attenuate a significant volume of water identifying that it will not increase flooding downstream or upstream.

Auckland Council's memorandum dated 16 June 2025 raises significant concerns about the sufficiency of information on stormwater and flooding. There is insufficient evidence to guarantee that the flooding outcomes can be achieved or to determine the consequences of failure, e.g., if culverts are blocked or the system is overwhelmed in extreme rainfall events beyond the 100-year.

When planning to urbanise an area, it is appropriate to first test constraints such as flood risk through the plan change process to determine whether the area is a suitable place for urban development. This process should demonstrate feasible solutions to avoid, remedy, or mitigate adverse effects. Then at the resource consent stage, the detailed design would be provided to confirm that flooding risks would be avoided, remedied or mitigated.

Despite incorporating Water Sensitive Design (WSD) elements, the project overlooks the critical first step: selecting a suitable site for development within the catchment. WSD principles emphasise protecting natural ecosystems and mimicking natural stormwater processes. The best approach is to cluster development on suitable land, minimising disturbance and earthworks (Auckland Council GD04, 2015).

It is clear from recent weather events in Auckland that we are experiencing an increase in the frequency and intensity of rainfall events due to climate change. While the Project accounts for a 3.8-degree climate change, it makes no sense to develop in the floodplain. There are other locations where housing can be supplied without having to manage flood risk to the extent required here.

#### *4.3 Car-less community*

Te Ākitai Waiohū supports aspirations for people to be less reliant on cars for their everyday needs. However, this is not necessarily a reality for all people. Many people must drive to work because there is no direct public transport route, and/or it doesn't operate when needed for shift work.

The provision of employment within the Project is acknowledged, but these jobs may not be suitable for nearby residents. It is unclear how the limited carparking will be assigned to residents, but one can assume that it will cost more. While it could be considered that Sunfield will be attractive to those who choose the lifestyle and do not want to own a car, it should be recognised that not all people have choices.

By relying on resource consents to approve the project, there is no guarantee that the outcomes will be maintained in the long term. New resource consents could be sought in the future to include additional roads and parking if early stages have been unsuccessful. The concept of car-less is therefore not considered a significant benefit.



#### *4.4 Ecological benefits*

Te Ākitai Waiohūa opposes the reclamation of streams within the Project site. The protection of freshwater and mauri of freshwater is a key priority for kaitiaki. For Te Ākitai Waiohūa the wai (water) is an inseparable part of our whakapapa and our identity, and is a fundamental part of what drives our very existence.

The future health and wellbeing of our waters are a matter of utmost importance to Te Ākitai Waiohūa and action is required to protect, restore and maintain the health and mauri of our waterways, stop further degradation and loss and reverse past damage. Genuine partnership in water governance and planning is sought to give effect to Te Ākitai Waiohūa customary dominion (ownership) of freshwater within their rohe.

Te Ākitai Waiohūa have an intergenerational responsibility to future-proof this natural resource for future generations. Te Ākitai Waiohūa assert that the mauri of wai must be maintained as a resource management priority throughout their rohe, and that the traditional and contemporary relationship between Te Ākitai Waiohūa and freshwater resources be maintained.

#### *4.5 Cultural values*

Te Ākitai Waiohūa has not committed to participating in the Mana Whenua Consultative Group and seeks to engage with SDL on an individual basis to ensure our mana motuhake and recognition of our association with the whenua. There is no one mana whenua voice as every iwi has its own whakapapa and pūrakau, which may not be fully reflected in a collective arrangement between six iwi groups.

The proposed Wai Mauri Stream Park is recognised as an opportunity to restore and enhance te taiao and protect the wai mauri. Te Ākitai Waiohūa seeks ongoing engagement on the integration of cultural narratives into this landscape because of our strong association with Takaanini.

Te Ākitai Waiohūa request that the applicant fully develop Wai Mauri Stream Park, including the establishment of planting through at least 5-year monitoring, prior to vesting to Auckland Council. This project should be commenced immediately in terms of iwi engagement in design to ensure it is established prior to residential areas being occupied.

#### *4.5 Draft conditions*

The draft conditions have been reviewed and specific comments provided in **Attachment 1** to this letter. It is critical that the conditions incorporate opportunities for Te Ākitai Waiohūa to exercise kaitiakitanga and mana motuhake within this significant area of our rohe.

Te Ākitai Waiohūa seeks the opportunity to work through the conditions with SDL to ensure the issues raised have been fully addressed.

### **5. Conclusion**

Te Ākitai Waiohūa have reviewed the fast-track application and wishes to express our strong opposition to the Project because it is located on flood-prone land. Our concerns are outlined above and are summarised here:

- **Scale and Duration:** The scale of development and the 15-year duration of resource consents sought are excessive and lack cultural and environmental certainty.

- **Planning Framework:** A plan change is the appropriate mechanism to establish a robust planning framework. Relying solely on resource consents risks future amendments or replacements that could undermine long-term outcomes.
- **Flood Risk:** There is insufficient clarity around flood modelling and downstream effects. We are particularly concerned about the reliability of the proposed flood management solution and the significant consequences should it fail.
- **Inappropriate Use of Cosgrave CVA:** The application's reliance on the Cosgrave Plan Change CVA is inappropriate. That CVA was prepared for a significantly smaller project within the Future Urban Zone and does not address the broader issues relevant to Sunfield.
- **Amendments to conditions:** Further engagement is required to ensure conditions provide enable Te Ākitai Waiohua to exercise kaitiakitanga and mana motuhake throughout the development process.

Te Ākitai Waiohua seeks commitment from Sunfield Development Ltd to ensure that development in Takaanini respects and reflects the cultural values and aspirations of mana whenua.

Ngā mihi,



Karen Wilson

Chair

**Te Ākitai Waiohua Settlement Trust**

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# Attachment 1: Te Ākitai Waiohū comments on draft conditions

Note: This table is adapted from a table prepared by Peter Fa'afiu, Navigator for mana whenua engagement in July 2025

No.	Explanation of condition	Impact on mana whenua (Peter Fa'afiu notes)	Te Ākitai Waiohū comments
4	Lapse of consent – 15 years after date of commencement	Construction period of project under this RC is 15 years.	Within this timeframe the planning system will be reformed and many references will be outdated as well as changes in best practice (e.g. condition 22 for erosion and sediment control)
5	Definition of “mana whenua” – designated 6x Iwi Authorities: <ul style="list-style-type: none"> <li>- Ngaati Te Ata Waiohū</li> <li>- Ngaati Paoa</li> <li>- Ngaati Whanaunga</li> <li>- Te Aakitai Waiohū</li> <li>- Ngaati Tamaoho</li> <li>- Ngai Tai ki Tamaki</li> </ul>	<p>Mana whenua in the conditions are these Iwi Authorities.</p> <p>Where engagement with ‘mana whenua’ is required on a permitted activity or stage of the project, these Iwi Authorities will be actively engaged by consent holder given the already four year relationship on this project.</p>	Acceptable
27	<p>Stormwater Management Plan (SMP) – to be prepared by the Consent Holder <u>in consultation</u> with mana whenua.</p> <p>Plan must include details of mana whenua feedback on design of stormwater management devices <u>AND</u> identify mana whenua feedback not incorporated, with reasons.</p>	<p>Stormwater is critical piece of infrastructure especially as it relates to Awakeri Stage 2 and 3. Strong theme of SMP + Awakeri from Te Aakitai + Ngaati Tamoho.</p> <p>Under this RC condition, all 6x Iwi will have same opportunity to be involved with design of stormwater management devices. Provision of equal opportunity important for all Iwi.</p>	<p>Support that SMP is prepared in consultation with Mana Whenua.</p> <p>Te Ākitai Waiohū never provided feedback to the effect that the provision of equal opportunity is important to all iwi. Te Ākitai Waiohū acknowledge other's interest in this area but it is a significant to Te Ākitai Waiohū.</p> <p>Te Roopu Kaitiaki o Papakura is no longer relevant as it existed under the legacy Papakura District Council.</p>

No.	Explanation of condition	Impact on mana whenua (Peter Fa'afiu notes)	Te Ākitai Waiohū comments
		Background: Five Iwi as members of Te Roopu Kaitiaki o Papakura were heavily involved with design and development of Awakeri Stage 1. Ngaati Te Ata, Ngaati Tamaoho, Ngai Tai ki Tamaki, Ngati Paoa, Te Aakitai Waiohū. Each Iwi represented by two representatives.	
28	Design, Layout and Finishing of Buildings in general accordance with the masterplan and design control documents to be certified by council		<p>These plans are a key component of the Project as these will detail the buildings to be constructed. Opportunity should be provided to at least inform mana whenua prior to completing these to demonstrate compliance with the masterplan and design concepts noting that conditions 29 and 30 also enable locations and typologies to change.</p> <p>Provide appropriate condition within the mana whenua conditions set to provide prior to submission to council for certification.</p>
31	Landscape Design Drawings and Specifications – provide detailed design and must include how the Consent Holder will engage with mana whenua and incorporate appropriately any cultural values in the landscaping of the project. Specific mention of importance of wayfinding activities for the site.	<p>Iwi Authorities to be consulted on the final detailed Sunfield wide landscape designs and have opportunity to contribute cultural values in the design.</p> <p>Whilst wayfinding, naming opportunities, and mahi toi is mentioned in the conditions, the consent holder understands that it will be more than this and</p>	<p>Support specific requirement for details of engagement and incorporation of mana whenua values into landscaped areas. All aspects of landscape design are of interest to Te Ākitai Waiohū including plan species, monitoring and maintenance and opportunities to participate as well as identify cultural narrative opportunities.</p> <p>Also include reference to this requirement in the mana whenua conditions set to resolve prior to submission to council for certification.</p>

No.	Explanation of condition	Impact on mana whenua (Peter Fa'afiu notes)	Te Ākitai Waiohū comments
		depends on discussions with iwi – both as a group and individually (via their outcomes agreement if one in place.)	<p>Te Ākitai Waiohū supports the retention of existing vegetation and wants to see the restoration of flora and fauna that once occupied this area.</p> <p>Given the scale of the Project a Landscape Management Plan should be required to set out all the relevant matters, including maintenance and outcomes of mana whenua engagement. Add to list in condition 9.</p> <p>Te Ākitai Waiohū have not committed to an outcomes agreement or a collective Mana Whenua Consultation Group. We expect to be engaged individually as this project is within the heartland of our rohe.</p>
33	Pre-commencement meeting on site prior to commencement of site works		Te Ākitai Waiohū requests to be given the opportunity to attend this meeting as it will provide the opportunity to be involved in decision-making on the site.
36-37	Cultural Induction – 15 days before commencement of earthworks.	Iwi Authorities will lead the design, planning and implementation of cultural induction. This will be an “ongoing basis” – lifetime of the project and in agreement with the consent holder.	<p>This could occur at the same time as pre-commencement meeting.</p> <p>It should be clear that cultural induction is required prior to commencement of any earthworks within a stage that has not been the subject of bulk earthworks.</p> <p>Te Ākitai Waiohū requests to be the contact for cultural induction given our relationship and association with the whenua. This should be set out in the condition.</p> <p>If Te Ākitai Waiohū cannot undertake the cultural induction it will be their responsibility to contact another iwi representative to fulfil this role.</p>

No.	Explanation of condition	Impact on mana whenua (Peter Fa'afiu notes)	Te Ākitai Waiohū comments
43	Review of implementation of consent conditions within six months under Section 128 of the RMA.	Iwi Authorities will be part of this review mechanism.	Te Ākitai Waiohū accepts that this is a standard is fairly standard. It should be clarified within condition X that Mana Whenua are to be consulted on any proposal to review any of the conditions of the consents.
72	Earthworks monitoring – explains in this condition the key elements for monitoring.	Iwi Authorities will monitor earthworks on an “ongoing basis”. Details of how to culturally monitor to be agreed between Consent Holder and Iwi Authority. Costs associated with this will be funded by consent holder.	<p>The condition is not entirely clear and enforceable. Te Ākitai Waiohū supports the invitation to undertake cultural monitoring. Cultural monitoring of earthworks must include the first scraping of earth to identify potential archaeological features. However, it should also include the ability to inspect ESC measures upon installation and throughout the development process.</p> <p>Te Ākitai Waiohū requests to be the contact for cultural monitoring given our relationship and association with the whenua. This should be set out in the condition.</p> <p>If Te Ākitai Waiohū cannot undertake the cultural monitoring it will be their responsibility to contact another iwi representative to fulfil this role.</p>
77	Sediment retention ponds and decanting earth bunds must be chemically treated in accordance with the ChTMP		<p>Te Ākitai Waiohū supports the use of organic flocculation to reduce the cumulative impacts of chemical treatment.</p> <p>The ChTMP should provide for bench testing to determine the appropriate treatment and whether it is required rather than a condition that specifies that chemical treatment must be required. Insufficient flexibility is provided by the condition to enable organic treatment to be utilised. Over the 15-year time period the science and treatment available may change substantially.</p>
86	Accidental Discovery Protocols in accordance with the AUP Standards E11.6.1 and E12.6.1	Mana whenua part of the protocols.	Te Ākitai Waiohū seeks a specific ADP for this project given the scale and significance of it. During the timeframe of this consent



No.	Explanation of condition	Impact on mana whenua (Peter Fa'afiu notes)	Te Ākitai Waiohū comments
			<p>the AUP is expected to change and this reference is unlikely to be relevant.</p> <p>A condition is sought that requires an ADP to be developed in consultation with and approved by Te Ākitai Waiohū.</p>
88	<p>Mana Whenua Consultation and Implementation</p> <p>A structure, purpose, objectives for the <u>Mana Whenua Consultative Group (MWCG)</u>.</p> <p>Terms of Reference to be negotiated between consent holder and Iwi Authorities as part of activating this condition. All consultants made available to Iwi. Resourcing of the group / members / participation at cost of consent holder.</p>	<p>Specific mana whenua conditions to be delivered by the Consent Holder in consultation with them.</p> <p>MWCG provides a structure for engagement in line with a strong theme of equal opportunity. Consent Holder acknowledges some might wish for individual engagement. Navigator Limited tasked to facilitate the MWCG and individual Iwi.</p> <p>Draft Advice Note provided to Tattico acknowledging individual outcomes agreement or relationship agreement in addition to MWCG. But these are only for the four who provided CVAs given they will showcase how CVA recommendations and cultural values are "provided for".</p>	<p>Te Ākitai Waiohū have not committed to an outcomes agreement or a collective MW Consultation Group. We expect to be engaged individually as this project is significant and within the heartland of our rohe.</p>

No.	Explanation of condition	Impact on mana whenua (Peter Fa'afiu notes)	Te Ākitai Waiohū comments
89	<p>Consent Holder has seven deliverables to implement the mana whenua conditions under condition 88 and 89.</p> <p>The seven deliverables are:</p> <p><i>"The Consent Holder shall:</i></p> <ul style="list-style-type: none"> <li>- <i>a. implement the Engagement Plan for the Mana Whenua Consultative Group (MWCG);</i></li> <li>- <i>b. provide a summary of the design measures proposed to reflect the cultural values of the Sunfield project to the MWCG for each precinct [or stage] of the development as it progresses. The Consent Holder may provide a combined summary for one or more precincts [or stages];</i></li> <li>- <i>c. provide access for Iwi Authorities to the Consent Holder's nominated design team specialists;</i></li> <li>- <i>d. provide input into cultural design matters;</i></li> </ul>	<p>Key points mentioned in the CVAs provided in RC conditions and common themes across all Iwi Authorities specifically mentioned under this condition i.e. the seven common deliverables for implementation.</p>	<p>Te Ākitai Waiohū acknowledges the attempt to provide a clear condition set for mana whenua. Further work is required to tighten up these condition to ensure they are clear, certain and enforceable. They should be time-bound and explicit about the outcomes to be achieved. Rather than grouping these together in a table they would be better to be specifically set out to assist with compliance.</p> <p>For example:</p> <ul style="list-style-type: none"> <li>• list those that must be consulted</li> <li>• timeframe for establishing any consultation group and composition</li> <li>• the purpose and objectives of the consultation group (plus frequency)</li> <li>• development of agreements in partnership with mana whenua</li> <li>• a programme of works shall include (but not be limited to)</li> <li>• in circumstances where mana whenua do not want to participate in the consultative group they shall be engaged individually</li> <li>• at least 3 months prior to commencement of construction of each stage of works mana whenua shall be invited to participate in design</li> <li>• at least 3 months prior to the commencement of construction of each stage of works mana whenua shall be invited to review and contribute to [list agreed] management plans</li> </ul>

No.	Explanation of condition	Impact on mana whenua (Peter Fa'afiu notes)	Te Ākitai Waiohū comments
	<ul style="list-style-type: none"> <li>- e. enable iwi to have cultural oversight and monitoring of the Sunfield development;</li> <li>- f. retain an architectural and/or landscape design company, with experience in cultural design, throughout the design and development phases of the Sunfield project;</li> <li>- g. meet the reasonable costs incurred by iwi in relation to the consultation actions described above."</li> </ul>		
90	Lizard Management Plan		Should also include 'the outcomes of any consultation with mana whenua and list as a relevant management plan under the mana whenua condition set.
91	Ecological Management Plan	Consultation with Iwi Authorities of Sunfield required for the development of the EMP.	Replace 'local iwi' with mana whenua for consistency and list as a relevant management plan under the mana whenua condition set.
92	Native Fish Management Plan	Consultation with Iwi Authorities of Sunfield required for the development of the EMP.	Support inclusion of outcomes of consultation with Mana Whenua and list as a relevant management plan under the mana whenua condition set.
93-95	Stream Offset Riparian Planting Plan		This is a key management plan of interest to Te Ākitai Waiohū to ensure that appropriate restoration and enhancement occurs to mitigate adverse effects. Te Ākitai Waiohū is interested in the identification of stream offset sites.

No.	Explanation of condition	Impact on mana whenua (Peter Fa'afiu notes)	Te Ākitai Waiohū comments
			<p>Include outcomes of consultation with Mana Whenua here and list as a relevant management plan under the mana whenua condition set. Key opportunity for restoration and enhancement, including establishing whakapapa planting.</p> <p>Te Ākitai Waiohū does not support 'no net loss' and wants to see a 'net gain' approach to ensure the te taiao is enhanced through development.</p>
120	<p>Sunfield Infrastructure requirements by stage. There are 25 stages for Sunfield.</p> <p>Table of requirements provided over 25 stages under the following headings: stormwater, roading, water supply, utilities.</p>	<p>Mana whenua ongoing consultation for all stages.</p> <p>This monitoring can be undertaken by the Mana Whenua Consultative Group – proposed engagement structure for implementing the project although some iwi might wish to have deeper individual engagement on a particular stage or precinct.</p>	<p>Nothing in this condition that specifies ongoing mana whenua consultation. This is addressed by mana whenua condition set. Te Ākitai Waiohū has particular interest in the stormwater infrastructure.</p>
121	<p>Landscape design implementation and maintenance.</p> <p>Certification of plans required before each stage of the development is occupied.</p>	<p>Ongoing mana whenua involvement to ensure consistency with Sunfield Masterplan Design Principles (e.g. Kaitiakitanga) and cultural values established in the earlier stages.</p>	<p>Provide clarity of timeframes for maintenance requirements. Planting should be maintained for at least 5-years to ensure it is well established and pest-free.</p>
150-152	<p>Cultural induction as part of the regional consent conditions.</p>	<p>Mana whenua to plan and lead.</p>	<p>As per comments above for condition 36-37.</p>

No.	Explanation of condition	Impact on mana whenua (Peter Fa'afiu notes)	Te Ākitai Waiohū comments
193	Establish a resident's association or Incorporated Society too own, manage, and maintain areas including landscaping, lighting, parks, private waste management.	If a resident's association is to be established then consent holder must consult Iwi Authorities about the ToR and role / responsibilities of the association or incorporated society. To ensure that the role of mana whenua is well understood and there is clarity. Residents' associations could be an hindrance to the activation of mana whenua cultural values, if roles / responsibilities not well understood.	Te Ākitai Waiohū agree that it is important to ensure that a resident's association doesn't undermine agreements made with mana whenua.
213-214	Ardmore Airport Restrictive Covenant – covers current and future landowner.	Consistency for mana whenua in terms of implementation / activation of Sunfield stages as it relates to Ardmore Airport. For example: clear understanding of noise contours, height of buildings, relationship to Mill Road.	Te Ākitai Waiohū seeks assurance that the health and well-being of future residents will be maintained to avoid noise effects from Ardmore Airport which is understood to be a busy commercial airport.
	Swale design		Te Ākitai Waiohū seeks a condition to require vegetated swales. This detail is not evident in the information provided.
	Fish passage		Te Ākitai Waiohū seek that provision for fish passage be provided for culverts and weir structures to support species migration upstream from McLennan Wetland and Awakeri Stage 1.

No.	Explanation of condition	Impact on mana whenua (Peter Fa'afiu notes)	Te Ākitai Waiohū comments
	Stormwater ponds / constructed wetland - detailed design certification		Noting the certification conditions for Awakeri Stages 2 and 3, Te Ākitai Waiohū wants to see appropriate conditions to confirm detailed design to ensure actual and potential effects of constructing and operating the stormwater conveyance / flood management system of swales and constructed wetlands are appropriately avoided, remedied or mitigated. These are currently not evident in the draft conditions.
	Kauri		It is likely that excavation will encounter kauri stumps and a condition should be included to address this, including providing opportunities for mana whenua to have them should they wish.