



1 August 2025

Environmental Protection Agency
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Email: substantive@fasttrack.govt.nz

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 operates incorporated societies that aim to promote and support kaitiakitanga as well as cultural and environmental values with regard to the wider needs of the community. These not-for-profit tribal organisations represent Te Ākitai Waiohūa in matters relating to the environment, sustainable resource management, education and the protection of wāhi tapu as well as advocate and uphold Te Ākitai Waiohūa cultural values and interests as Mana Whenua. 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 TAWST is a member.

These comments are provided by TAWST but represent the views of Te Ākitai Waiohūa including its kaitiaki organisations.

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. 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.

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

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

Te Ākitai Waiohūa is not against development. However, when development occurs, the expectation is for restoration and enhancement of te taiao to restore the mauri of the wai and whenua and leave it in a better state than they were 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 Waiohūa has not prepared a CVA for the fast-track application.

3. Engagement on the fast-track application

Te Ākitai Waiohūa 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 Waiohūa 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 Waiohūa.

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

Te Ākitai Waiohūa acknowledges 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 iwi to engage with the application material meaningfully. It should be noted that Te Ākitai Waiohūa and TAWST is invited to make comments on several other applications under the FTAA at the same time, affecting our limited capacity.

TAWST submitted in opposition to the Fast Track Approvals Bill 2024 (FTAB) because of the heavy emphasis on development over te taiao environment and the effects on Te Ākitai Waiohūa customary rights, interests and responsibilities including iwi Tiriti o Waitangi settlement interests, and the ability for Te Ākitai Waiohūa to exercise mana motuhake and

kaitiakitanga within Tāmaki Makaurau. A key concern was the lack of time for Te Ākitai Waiohū to properly consider or scrutinize projects listed in Schedule 2A.

The Te Ākitai Waiohū 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 entire 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 adjustments to the original masterplan and changes to the speed of construction reflecting market conditions as would be expected over a long period of time. 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, adjustments to best practice, or shifts in market demand. Approving these resource consents locks development into what may be considered appropriate today but may not be appropriate or viable in 5 to 10 years' time. 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-hectare 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 not enough evidence to guarantee that the non-flooding outcomes can be achieved or to determine what the consequences of failure will be. For example, what will occur if culverts are blocked or the system is overwhelmed in extreme rainfall events beyond the 100-year event.

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 can 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 (or a significant enough) 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 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 coming 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 develops 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 a strong opposition to the Project because it is located on flood-prone land. These 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 specifically 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 enable Te Ākitai Waiohūa to exercise kaitiakitanga throughout the development process.

Te Ākitai Waiohūa 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,



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