**RESPONSE TO INVITATION TO COMMENT – SUNFIELD DEVELOPMENT**

This response is filed for Waikato-Tainui by:

**Te Whakakitenga o Waikato Incorporated**
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## INTRODUCTION

1. This response is made on behalf of Te Whakakitenga o Waikato Incorporated (formerly Waikato-Tainui Te Kauhanganui Incorporated), as the representative body of Waikato-Tainui's 68 marae and 97,000 tribal members (see Appendix A). Waikato-Tainui welcomes the opportunity to respond to the "SUNFIELD" fast-track application.

## BACKGROUND TO WAIKATO-TAINUI

2. Waikato-Tainui are kaitiaki of our environment and regard the holistic integrated management of all elements of the environment (such as flora, fauna, land, air and water) with utmost importance.

3. Waikato-Tainui are tangata whenua and exercise mana whakahaere within our rohe (tribal region). Our rohe is bounded by Taamaki Makaurau in the north and Te Rohe Pootae (King Country) in the south and extends from the west coast to the mountain ranges of Hapuakohe and Kaimai in the east. Significant landmarks within the rohe of Waikato-Tainui include the Waikato and Waipaa Rivers, the sacred mountains of Taupiri, Karioi, Pirongia and Maungatautari, and the west coast harbours of Whaaingaroa (Raglan), Manukau, Aotea and Kawhia moana, the eastern areas of Tikapa Moana (Firth of Thames), and principally, New Zealand's longest river, Te Awa o Waikato.

4. Both through its hapuu and collectively as an iwi, Waikato-Tainui has maintained ahi kaa, continues to exercise mana whakahaere, rangatiratanga and kaitiakitanga, and upholds and exercises Waikato-Tainui tikanga, kawa, maatauranga and reo within the Waikato-Tainui Rohe.

5. We acknowledge and affirm the intrinsic relationship of Waikato-Tainui with our natural environment, which carries with it both rights and responsibilities as a matter of tikanga and kawa.

## WAIKATO-TAINUI OUTSTANDING AND REMAINING CLAIMS

6. Waikato-Tainui continue to negotiate outstanding Treaty of Waitangi claims with the Crown, including matters specific to Taamaki Makaurau. These claims form part of the broader Wai 30 claim and are comprehensive—covering land, coastal and marine areas, and associated social, cultural, and economic interests.

7. The Wai 30 claim, held by Te Whakakitenga o Waikato on behalf of all 33 hapuu of Waikato-Tainui, includes matters originally filed in 1987 that were set aside from the 1995 and 2010 settlements. The Taamaki component, which includes Waitemataa (Waitemataa Harbour) and Te Maanukanuka-o-Hoturoa (Manukau Harbour), continues this work.

8. The claim encompasses airspace, water space, subsoil, flora and fauna, and all interconnected land and marine elements, including the environmental and cultural impacts of activity within and around Waitemataa & Manukau Harbours. Redress mechanisms in this regard are still being developed and negotiated with the Crown. In absence of settlement protections for these remaining claims, Waikato-Tainui seeks to provide and secure environmental protections for te taiao through other available pathways.

9. Within this context, it is important to acknowledge that several marae, hapuu and iwi affiliated to Te Whakakitenga o Waikato have direct whakapapa and geographic connections to the area encompassed by the proposed Sunfield development. These marae, and the hapuu they represent, maintain enduring relationships with the proposed site.

10. Their interests extend beyond cultural and historical matters to include environmental and cultural stewardship, social wellbeing, and broader responsibilities to land and community. Their active involvement in the current process should reflect that standing and the multifaceted role they play in protecting and advancing the interests of their people and whenua.

**IWI ENGAGEMENT**

11. Waikato-Tainui acknowledges the importance of land development and the pressing need to provide quality housing to support regional growth. As developers ourselves, we are committed to ensuring that ecological, cultural, and statutory considerations are

upheld to the highest standard. We also remain mindful of the broader implications such developments may have on iwi, hapuu, and the environment, particularly within the Taamaki region where our responsibilities as kaitiaki endure.

12. Engagement to date has included cultural reports and input from several Waikato-Tainui marae, hapuu with interests in the site. Waikato-Tainui provides this feedback in our role as a central iwi entity, representing the collective interests of our affiliate marae and hapuu, while fully respecting the mana and authority of those marae and hapuu within their respective takiwaa. The feedback given should be afforded ongoing, meaningful, and appropriate consideration throughout all phases of planning, design, and delivery. Cultural values and responsibilities should be embedded not only in process but reflected through tangible outcomes on the ground.

13. Given that the proposal is now being considered under the Fast-track Consenting process rather than the Urban Development Act (UDA), we consider it important that iwi are given the opportunity to provide separate or amended feedback at the Applicant's expense. Our understanding is that the iwi input provided to date was made under the UDA framework, which differs significantly from the current statutory process in terms of scope, decision-making, and opportunities for iwi engagement.

14. While Sunfield Developments Limited (SDL), via Navigator, contacted all 19 iwi authorities in March 2021 as part of its previous UDA application—and six iwi indicated their interest in the development—those same iwi were only advised in April 2024 of the shift to the Fast-track process. In our view, this change warrants a renewed opportunity for meaningful engagement and input. It is essential that whaanau are not constrained by the reduced timeframes characteristic of the Fast-track process when providing their feedback.

15. At a minimum, there should be a revision of the iwi input provided to date. Feedback that may have been appropriate under the UDA may not fully capture iwi views in the context of the Fast-track process, which presents more limited avenues for participation. Iwi should be given the opportunity to revisit their earlier positions and provide revised or additional input that reflects the current statutory framework.

16. Waikato-Tainui will continue to monitor the inputs provided by our affiliated marae and hapuu to date and throughout the Fast-track process. We reserve the right to provide

further iwi-specific feedback as necessary, particularly where we consider that our interests or those of our affiliated marae and hapuu have not been fully reflected or considered in the proposal or associated engagement processes. Where appropriate, we will also support the positions of mana whenua who hold direct interests in the site and whose views align with the protection of cultural values and responsibilities.

**AUCKLAND COUNCIL ENGAGEMENT**

17. Of particular interest is the limited level of engagement or response from Council on these matters. In our experience, Council typically maintains a strong interest in developments within flood-prone areas, particularly where public infrastructure, downstream capacity, or liability may be affected. The absence of clear Council involvement raises questions about whether there are unresolved concerns or gaps in information that have yet to be addressed.

18. This leads us to ask: what aspects of the current proposal may be contributing to that disengagement? Is further work required to satisfy Council's expectations around long-term resilience, asset ownership, or downstream impacts? From our position, these questions remain open, and a more transparent understanding of Council's stance would support greater confidence in the development's ability to manage flood risk over time.

19. We are aware that Sunfield's stormwater solution relies heavily on the future delivery of Awakeri Wetlands Stages 2 and 3, which are yet to be consented and constructed. While SDL has lodged the relevant resource consents on behalf of Healthy Waters, and Auckland City Council has issued a draft set of 89 conditions, we are concerned by the reliance on infrastructure that remains in early planning stages — particularly given that Stage 1 was completed several years ago with limited clarity on the integration of subsequent stages.

20. From our perspective, several issues remain unresolved. The fact that the resource consent is effects-based under the Unitary Plan, and does not constitute engineering plan approval, raises questions about the completeness and reliability of the current design. The scale and function of the proposed wetland and stormwater system are significant, yet it remains unclear whether the flood risks across the site — including in rural floodplain zones — have been robustly modelled using updated data or verified

independently. There is also limited transparency about how these staged works will be delivered in practice, and what contingency exists should delays or design changes occur.

21. We note the inclusion of cultural monitoring and mana whenua involvement in the draft conditions, which is positive in principle. However, at this point, it is unclear whether mana whenua have had sufficient time or capacity to review the latest version of the consent conditions in detail, or to assess whether their cultural and ecological concerns have been meaningfully incorporated into the design.

22. Given these factors - combined with the move to the Fast-track Consenting process - we remain cautious about the readiness of the Sunfield proposal for approval. We encourage greater clarity around flood modelling, engineering design, mana whenua review, and delivery timeframes for the Awakeri infrastructure. Until these matters are addressed with sufficient rigour, there is a real risk that the stormwater system underpinning the development may not perform as intended — with consequences for both environmental and cultural values in the area.

**POTENTIALLY PRODUCTIVE LAND**

23. The Waikato-Tainui remains committed to the protection and retention of highly productive land within our rohe, consistent with our contributions to the development of the NPS-HPL and our broader responsibilities as kaitiaki. While we acknowledge that the Sunfield site may face limitations — including heavy clay soils, drainage constraints, and fragmented land ownership — we remain concerned that its classification as highly productive land under the NPS-HPL may be too easily set aside.

24. In our view, the absence of LUC class 1 land does not, on its own, justify the conversion of this whenua from its productive potential to intensive housing and infrastructure use — particularly when other areas in the region with higher-quality soils remain under threat from development. The long-term value of retaining productive land must be assessed not only in economic terms but through a lens of intergenerational food security, resilience, and cultural significance. Accordingly, we advocate for a precautionary approach and for the maximum retention of productive

land where feasible, especially in areas where Maaori interests in land use and food systems remain active and enduring.

**FLOOD RISK**

25. The site's location within a floodplain is acknowledged, and it is noted that an engineering solution has been proposed to manage associated risks. From a governance and oversight perspective, further clarity may be needed on how that solution accounts for future climate projections, including increased frequency and intensity of rainfall events. Given the long-term nature of residential and community infrastructure, assurance around how flood risks will be managed over several decades is an important consideration.

26. It may also be useful to understand the assumptions and margins built into the modelling to ensure the design remains effective as conditions change. For example, clarification on how extreme event thresholds, catchment changes, and projected urbanisation have been factored in would support confidence in the resilience of the proposed system.

27. While the response refers to peer-reviewed stormwater modelling, it appears that the focus remains on technical compliance rather than broader long-term exposure to risk. A more detailed discussion of potential consequences if the mitigation does not perform as intended — particularly during high-impact weather events — could assist with risk transparency and planning.

28. There is also limited discussion of the wider hydrological context. As stormwater systems extend beyond individual sites, a clearer picture of how downstream catchments, neighbouring properties, or public infrastructure may be affected — and how any risk is shared or managed — would be valuable.

29. It is not clear whether the development intends to include long-term monitoring of flood performance or adaptation measures in the event conditions change. Some visibility of how performance will be tracked over time, and what triggers any future upgrades or interventions, would help ensure the system is not only compliant at the outset but continues to protect residents and infrastructure into the future.

**RECOMMENDATIONS**

30. Waikato-Tainui supports the provision of housing and is committed to ensuring development upholds the highest environmental, cultural, and statutory standards. As a central iwi entity, we support the positions of our affiliated marae and hapū with interests in the site, while retaining the right to comment on iwi-level matters where appropriate.

31. Cultural reports and feedback have already been provided by marae and hapū. However, the shift to the Fast-track Consenting process materially changes the context. Feedback given under the Urban Development Act may not reflect the constraints or implications of the current process. Iwi should be given the opportunity to revise or supplement their input at the applicant's expense.

32. We remain cautious about unresolved flood risk matters. The proposal relies heavily on unbuilt and unconsented infrastructure (Awakeri Wetlands Stages 2 and 3), with limited visibility on delivery timelines or contingency planning. It is unclear whether Auckland Council's lack of engagement reflects confidence or ongoing concerns — but the uncertainty is unhelpful. Long-term performance, monitoring, and downstream effects require more clarity.

33. Waikato-Tainui makes the following recommendations as a starting point for further engagement, clarification, and refinement of the proposal:

    a) Enable iwi and hapuu to revisit their input under the Fast-Track process, at the applicant's expense.
    b) Ensure that cultural values are embedded in outcomes, not just acknowledged through process.
    c) Provide clarity on Auckland Council's position regarding flood risk and infrastructure delivery.
    d) Strengthen certainty around the implementation and long-term performance of stormwater infrastructure.
    e) Reassess the treatment of productive land in line with the intent of the NPS-HPL.

**DATED** **4 AUGUST 2025**

**TE WHAKAKITENGA O WAIKATO INCORPORATED**

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## APPENDICES

### *APPENDIX A – Waikato-Tainui 68 Marae*