

19 May 2026

To: Expert Consenting Panel, Downtown Carpark Site Development – Te Pūmanawa o Tāmaki
From: Precinct Properties New Zealand Limited ("**Precinct**") and Ngāti Whātua Ōrākei

Subject: Response to comments on the Downtown Carpark Site Development ("**Project**") – Ngāti Whanaunga

Introduction

1. Precinct provided the Expert Panel with a Cultural Values and Impact Assessment ("**CVA**") received from Ngāti Whanaunga, on 7 April 2026. Precinct has been working with its project partner Ngāti Whātua Ōrākei in terms of responding to the contents of the CVA. Ngāti Whātua Ōrākei preferred approach is to address the matters within the CVA through a tikanga-based approach and has attempted contact with Ngāti Whanaunga through Ngāti Pāoa on that basis, however to date no response has been received.
2. To assist the Expert Panel, the purpose of this letter is to provide a response to the CVA. This response is given jointly by Precinct and Ngāti Whātua Ōrākei given Ngāti Whātua Ōrākei's role as project partner and its deep connection with the Site as tangata whenua.
3. At the outset, it is important for the Expert Panel to be aware that as outlined in Ngāti Whanaunga's CVA, the Project Site does not sit within te rohe pōtae o Ngāti Whanaunga. The CVA only discusses Ngāti Whanaunga's interest and standing in relation to Tāmaki as a whole, and not the Project site. Ngāti Whanaunga's head office is based in the Coromandel.
4. Ngāti Whātua Ōrākei are the tangata whenua of Tāmaki, including Auckland Central and the Project site. This is not disputed by Ngāti Whanaunga.
5. The importance of the site to Ngāti Whātua Ōrākei is intrinsically linked to the cultural and historical significance of the land and former seabed upon which it sits. The Site is at the centre of Ngāti Whātua Ōrākei's heartland, and sits below a cliff top pā site, overlooking the sacred Waitematā. Critically, the existing Downtown Carpark sits on what was formerly the Waitematā seabed, over which Ngāti Whātua Ōrākei has an unresolved grievance surrounding its loss of customary title.

6. Ngāti Whātua Ōrākei's partnership with Precinct on the Project represents an opportunity to exercise its mana as kaitiaki, which is critically important as tangata whenua of the land on which the Site sits. Ngāti Whātua Ōrākei has been heavily involved in the design of the Project to ensure that it contains Māori design elements that reflect the importance of the Site to Ngāti Whātua Ōrākei.

Response to Ngāti Whanaunga's CVA

7. The general theme of the recommendations in the CVA are that Ngāti Whanaunga requests that it is involved in the Project going forward, including in relation to further design and ongoing input into cultural experiences at the Site.¹ Ngāti Whātua Ōrākei does not support this proposal, and Precinct endorses that position as Ngāti Whātua Ōrākei's project partner.
8. As outlined above, Ngāti Whātua Ōrākei are the tangata whenua of the Site and is a Project partner. The Site does not sit within Ngāti Whanaunga's rohe. Ngāti Whātua Ōrākei's view, supported by Precinct, is that it is therefore appropriate for Precinct to continue to work with Ngāti Whātua Ōrākei to ensure the Project continues to reflect Ngāti Whātua Ōrākei's mana over the land and former seabed the Site sits upon.
9. Further, in its CVA, Ngāti Whanaunga also requests that:
- (a) a placeholder for Māori information is inserted into the conditions of consent for the sought archaeological authority. Precinct confirms that it has now received the s51 report from Heritage New Zealand Pouhere Taonga recommending approval of the archaeological authority, along with the further comments received from Heritage New Zealand Pouhere Taonga under s53 of the Fast Track Approvals Act. There are specific conditions in relation to Tikanga. In particular, in its s53 comments, Heritage New Zealand Pouhere Taonga has updated conditions 5, 6 and 11 to refer to, and therefore involve in the archaeological process, Waikato-Tainui and Ngaati Whanaunga (alongside Ngāti Whātua Ōrākei). For the reasons set out above, particularly that Ngāti Whātua Ōrākei are the tangata whenua of Tāmaki and the Project site, Ngāti Whātua Ōrākei considers it is not appropriate for Waikato-Tainui and Ngaati Whanaunga to be included in conditions 5, 6 and 11 of the archaeological authority. Ngāti Whātua Ōrākei's position is supported by Precinct. Those parties should therefore be removed from the proposed condition wording.

¹ Cultural Values and Impact Assessments, Ngaati Whanaunga Incorporated Society, 19 December 2025 at page [22].

(b) the Project's conditions require iwi representatives to be informed at least 48 hours before the start of works requiring archaeological monitoring.² This requirement is recommended in the Draft Archaeological Management Plan attached to Precinct's Fast Track application. Condition 2 of the archaeological authority within the s51 report requires that the authority must be exercised in accordance with the (Draft) Archaeological Management Plan. Ngāti Whātua Ōrākei supports this proposed approach.

10. The CVA also expresses concern as to whether Haumi, in delivering the cultural design report, engaged with iwi who have mana l te whenua.³ In response, Precinct can confirm Haumi is a design partner on the Project, supported by Ngāti Whātua Ōrākei, to ensure that cultural values reflected in the Project are those of Ngāti Whātua Ōrākei, being the tangata whenua of the land upon which the Site sits.

Yours sincerely,


Iain Purdie

Project Director

² Cultural Values and Impact Assessments, Ngaati Whanaunga Incorporated Society, 19 December 2025 at page [22].

³ Cultural Values and Impact Assessments, Ngaati Whanaunga Incorporated Society, 19 December 2025 at page [17].