

5 November 2025

Environmental Protection Authority
Private Bag 63002
Wellington 6140
New Zealand

Tēnā koe

1. This letter sets out Ngāti Whātua Ōrākei's ("**Ngāti Whātua Ōrākei**") support of Precinct's Downtown Carpark Site Development project ("**Project**"). We believe the Project will enhance the cultural values of the Auckland CBD and will provide tangible and ongoing benefits to our iwi.

Ngāti Whātua Ōrākei

2. Ngāti Whātua Ōrākei are the tangata whenua of Tāmaki. Our mana over the land and sea is underpinned by take tupuna (ancestral relationships), take raupatu (taking of the land and sea by traditional warfare), ahi kā (unbroken occupation) and tuku whenua (traditional gifting of land).
3. Our rohe extends from Pipimea (Mission Bay South) northwest up the inner Waitematā as far as Tauhinu Pā near Riverhead. We acknowledge shared interest with our close relations Te Kawerau a Maki around One Kiritia (Hobsonville), Mānu Te Whau (Massey) and Orangihina (Te Atatū Peninsula). Our southern boundary extends from Pipimea south west to Kāretu or Anne's Creek at Penrose along the Māngere Inlet to Onehunga thence to Karaka the western waka portage at New Lynn. We acknowledge the tangata whenua status of our Waiohau relations to the south. At Te Whau the river in the west our boundary skirts up the Ōrūkuwai Peninsula to Pītotoi at Riverhead and Tauhinu mentioned above before heading south back to Te Onewa Pā the headland the northern Harbour Bridge lands upon before crossing back to Pipimea. To the east of these places we recognise our neighbours Ngāti Pāoa and their tanga whenua status.
4. Ngāti Whātua Ōrākei comprises three distinct hapū being Ngā Oho, Te Uringutu, and Te Taoū ki Tāmaki. Our respective lineages stem from the original inhabitants of the Tāmaki isthmus and connect to the autonomous iwi and hapū of Kaipara, Maunganui, and Muriwhenua, the original homeland.
5. Ngāti Whātua Ōrākei has approximately 7,500 registered members throughout Aotearoa and globally, all of whom celebrate our direct blood lineage from our common tupuna (ancestor) Tuperiri. The collective affairs of our hapū are overseen by the Ngāti Whātua Ōrākei Trust.

Importance of site to Ngāti Whātua Ōrākei

6. The importance of the Project site to Ngāti Whātua Ōrākei is intrinsically linked to the cultural and historical significance of the land and former seabed which it sits on.

7. The site is part of Te Kahu Tōpuni o Tuperiri (the outstretched cloak of Tuperiri) and at the centre of Ngāti Whātua Ōrākei's heartland. It sits below a clifftop pā site, at the western mouth of the Waihorotiu Stream, and overlooking the sacred Waitematā.
8. Historically, a network of Māori fishing villages dotted the area. For generations going back to Tuperiri and his sons, customary resource management and exploitation systems were practiced there.
9. Importantly, the existing downtown carpark building sits atop what was formerly the Waitematā seabed, over which Ngāti Whātua Ōrākei holds an unresolved grievance surrounding our loss of customary title. We maintain that no transaction was ever made under which our rights over the seabed were surrendered. To date, the Crown has not settled this grievance.
10. Despite this, we have taken our interests into our own hands by seeking creative and pragmatic ways to exercise Ngāti Whātua Ōrākei's customary authority. In 1996, we purchased from the Crown surplus railway lands which comprised 20 hectares of reclaimed land being the former seabed spanning Quay Street, from The Strand to Britomart, and along Beach Rd. This area is known as Te Tōangaroa. Such opportunities seldom arise, and so it is important that we act on them when available given their significance to our hapū. Our partnership with Precinct on the Downtown development represents another such opportunity, including to further exercise Ngāti Whātua Ōrākei's mana as kaitiaki of the underlying land.
11. The existing downtown carpark building which currently sits on the site is unwelcoming and becoming run down. Frankly, the structure is incongruent with the cultural significance of the site to Ngāti Whātua Ōrākei and our interest, as tangata whenua of Auckland Central, in promoting a thriving Auckland CBD. Self-evidently, it is not an expression of Māori design nor does it represent the significance of the site to Ngāti Whātua Ōrākei.

Partnership with Precinct

12. Ngāti Whātua Ōrākei Whai Rawa Limited has partnered with Precinct in relation to the Project. Precinct approached Ngāti Whātua Ōrākei with a proposal to partner on the redevelopment of the Project site in about October 2021, following release of the expressions of interest document by Eke Panuku (now called Auckland Urban Development Office). For the reasons I explain below it was important for Ngāti Whātua Ōrākei specifically to be involved with any redevelopment of the Project site. The Board of Ngāti Whātua Ōrākei Whai Rawa Limited approved the company entering into an agreement with Precinct to participate in the Downtown redevelopment on 16 June 2022.
13. We had previously worked with Precinct on facilitating Māori design input into Precinct's Commercial Bay development and named the tower in Commercial Bay 'Te Toki ki te Rangī'. As a consequence, we were aware not only of Precinct's track record of being able to take transformational projects of this nature through to completion, but that it would be willing to work with Ngāti Whātua Ōrākei to create a development that not only recognised and paid respect to our values and connection to the site as tangata whenua, but that would actively involve our people in that process.

14. The cultural design memorandum provided by Haumi specifically addresses Māori values in the design of the Project, to guide the conceptual direction of the development. This demonstrates that Māori design is woven throughout the Project, right from the very beginning. The memorandum explains how the design of the Project draws on whakairo rākau, is grounded in place and attentive to its social, cultural, and historical context. The Project binds human craft and natural process, producing a place where city, harbour, and community are redefined in relation to one another.
15. Ngāti Whātua Ōrākei had input to ensure that Precinct's proposal and its development:
 - a. provided local and sustainable employment opportunities for, among others, whānau members within our hapū, thereby fostering not only a sense of inclusion with regards to the development but strengthening our relationship to our customary land; and
 - b. would appropriately acknowledge the tangata whenua and express a Te Tiriti based relationship of mutual and respectful benefit. This was to be achieved not only through what the Project secured by way of financial and economic benefits for Māori, but also through ensuring our identity was reflected within the design of the buildings.
16. The redevelopment of the Project site by Precinct will see a high quality, Ngāti Whātua Ōrākei and therefore Māori influenced, space at the centre of Auckland's CBD. From the perspective of enhancing cultural representation, Māori and Aucklanders more generally stand to benefit significantly from it.
17. Precinct's design is influenced by a contemporary interpretation of whakairo rākau, an ancient Māori art form that has been passed down through generations. The literal meaning of whakairo is "to eat away", and it involves taking away the extraneous material to reveal the essence of the form. This flows from the removal of the existing structure and into both the physical appearance and shape that the development ultimately takes within the skyline of Tāmaki, as well as the feel of the interior and public spaces.
18. To Ngāti Whātua Ōrākei, there is an additional significance to having a Māori design, the creation of which was led by our own people, on the site. It reflects our history and unbroken mana over the former Waitematā seabed.
19. In addition to Māori design outcomes, to the extent that Precinct elects to include commissioned Māori artworks within the Downtown redevelopment, Precinct has agreed to use reasonable endeavours to make available the opportunity for artists that whakapapa to Ngāti Whātua Ōrākei to be involved in developing that artwork.
20. The redevelopment also stands to benefit Ngāti Whātua Ōrākei financially. Ngāti Whātua Ōrākei Whai Rawa Limited has formal options agreed with Precinct to participate and invest in the office component of the development. Specifically, and while the precise structure of the arrangements continues to evolve, Ngāti Whātua Ōrākei Whai Rawa Limited currently has two exercisable options (arising at different stages of the development), which together would allow it to acquire an interest of up to 20% in the limited partnership Precinct will form as the vehicle to hold the office component of the development and facilitate joint venture arrangements. Such opportunities are few and far between. In fact, this is Ngāti

Whātua Ōrākei's first major investment in the CBD (outside of Te Tōangaroa precinct) for 184 years. The economic returns will open doors for future investment and growth.

21. Ngāti Whātua Ōrākei will also lead an opportunity for other iwi and hapū around Aotearoa to invest in the Downtown redevelopment, allowing the economic benefits of the project to extend to other tribes. In what will be one of the first of its kind, the investment opportunity will be conducted in accordance with tikanga. That is, that the hau kāinga or resident hapū will lead and organise the broader iwi investment component for mutual benefit.
22. Traditionally, members of other tribes would approach local iwi or hapū to greet them and seek support before conducting affairs or enterprises on whenua within their rohe. Applying these practices to the investment opportunity, iwi and hapū will be given the opportunity to approach Ngāti Whātua Ōrākei and recognise us as tangata whenua and ahi kā of our rohe, to seek to participate in the Downtown development, through our investment initiative Te Tomokanga ki Tamaki. It will be an example of commerce operating within Te Ao Māori and reflects Ngāti Whātua Ōrākei's mana over the whenua within our rohe. In turn, we hope it will serve to maintain and improve relationships between tribes and act as a model for future collaboration and investment across iwi.
23. Precinct and Ngāti Whātua Ōrākei Whai Rawa Limited have also agreed a range of non-commercial outcomes to benefit our hapū with a framework for employment opportunities, small business and contractor opportunities and career progression. We have agreed to work together to identify employment opportunities and agree a process for the promotion of such opportunities to hapū members of Ngāti Whātua Ōrākei during the Project's development stage and also during the ongoing operation of that part of the completed development that is owned by the joint venture. Precinct and Ngāti Whātua Ōrākei also agreed to work together to establish career pathway/progression opportunities for those hapū members employed under this framework.
24. In addition to the employment opportunities, Precinct and Ngāti Whātua Ōrākei Whai Rawa Limited agreed to develop a similar framework for small business and contractor opportunities for the engagement of businesses owned (or partly owned) by hapū members of Ngāti Whātua Ōrākei in connection with commercial arrangements available during the development works.
25. These opportunities are demonstrative of the quality of the partnership we share with Precinct, and secure long-term investment in the education, professional development and financial future for Ngāti Whātua Ōrākei's people.
26. The Iwi Management Plan for Ngāti Whātua Ōrākei ("**Iwi Management Plan**") was produced in 2018 in partnership with Auckland Council¹. The Iwi Management Plan is the resource management plan for Ngāti Whātua Ōrākei. It is a statement of Ngāti Whātua Ōrākei interests and values as they apply in resource management matters. The Project will align with the environmental outcomes sought by the Plan.

¹ Available here: [Planning Committee meeting held on 7/08/2018 - Item 8 Lodgement of iwi management plan for Ngāti Whātua Ōrākei - Attachment Ngāti Whātua Ōrākei iwi management plan - Te Pou o te Kāhu Pōkere](#).

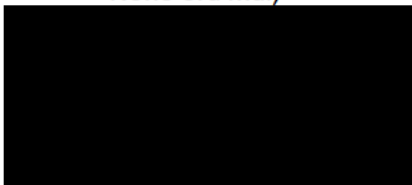


27. We acknowledge that the Project application also seeks approval for an archaeological authority described in section 44(a) or (b) of the Heritage New Zealand Pouhere Taonga Act 2014 ("HNZPT"). As set out in the Archaeological Assessment prepared by Ellen Cameron of Clough & Associates (October 2025), we understand that this relates to archaeological site R11/3458 (the Auckland Graving Dock) and will also require the removal of a small area of 19th century reclamation fill and a larger area of 1915 reclamation fill. The areas of reclamation have the potential to contain historic artefacts and early maritime structures and features and possibly early 20th century building foundations. Ngāti Whātua Ōrākei, as tangata whenua, supports the application for the archaeological authority, in relation to Māori cultural values.

Aspirations for the Project

28. The sum of the economic and cultural benefits described above, and Ngāti Whātua Ōrākei's integral role in driving the project (which goes far beyond mere tokenism), is that the redevelopment of the Project site has huge significance to Ngāti Whātua Ōrākei. Fundamentally, it can be viewed as a vessel for us to more fully exercise our customary authority over such a culturally significant site.
29. In a more general sense too, as tangata whenua of our rohe, we want the Auckland CBD to be the best it can be. We take great pride in our ancestors establishing this city with Governor Hobson, and we have a strong interest in seeing it flourish. To do that, we need high-quality mixed-use spaces attracting both regional and international investment. Precinct's development will deliver this, and as a result its addition to the city will foster and reflect Ngāti Whātua Ōrākei's mana.
30. The Project is an opportunity for us as tangata whenua to work with one of the arms of our Te Tiriti partner Auckland Council to create something that reflects our rangatiratanga, the benefits of which extend to other iwi, and to the vibrancy and economy of Auckland city.
31. From the perspective of Ngāti Whātua Ōrākei, our interest is in removing the aging carpark building from the site and running with the momentum we have now gathered with Precinct to progress towards delivering our Ngāti Whātua Ōrākei -ed design and Te Tomokanga Ki Tāmaki venture.
32. We appreciate the Panel's consideration of the Project and strongly support the grant of resource consent.

Noho ora mai,



Ngarimu Blair
Director
Ngāti Whātua Ōrākei Trustee Limited