



20 May 2026

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Tēnā koe,

Re: North West Rapid Transit Fast-Track Application – Te Ākitai Waiohua comments

Te Ākitai Waiohua Settlement Trust (Te Ākitai Waiohua) welcomes the opportunity to provide comments on the substantive application by New Zealand Transport Agency (NZTA) under the Fast Track Approvals Act 2024 for notices of requirement (NOR) and applications for resource consent and archaeological authorities (the Application) for the North West Rapid Transit Project (the Project).

1. Introduction

Te Ākitai Waiohua is a Mana Whenua iwi of Tāmaki Makaurau/Auckland.

Te Ākitai Waiohua is also a member of Ngā Mana Whenua o Tāmaki Makaurau, the tribal collective and beneficiary of the Treaty of Waitangi settlement redress received in the Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Deed (the Tāmaki Collective Settlement) and related Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Act 2014 (the Tāmaki Collective Redress Act). Te Ākitai Waiohua is specifically a member of the Waiohua Tamaki Alliance rūpū.

Te Ākitai Waiohua completed negotiations with the Office for Māori Crown Relations (Te Arawhiti) to settle the specific historical claims of Te Ākitai Waiohua under Te Tiriti o Waitangi. Te Ākitai Waiohua signed a Deed of Settlement with the Crown in 2021 and is waiting for supporting legislation to be introduced and passed by Parliament.

Te Ākitai Waiohua Settlement Trust is an active Post Settlement Governance Entity that represents the people of Te Ākitai Waiohua and is responsible for administering any redress received in the Te Ākitai Waiohua settlement. Te Ākitai Waiohua also actively participates in local government, planning and consenting processes through the Resource Management Act 1991 (RMA) and its associated mechanisms.

Although another entity, Te Ākitai Waiohua Waka Taua Incorporated Society, engages in the RMA process at a kaitiaki level, as an iwi, the Settlement Trust has an interest in fast-track projects as an iwi authority.

Te Ākitai Waiohua prepared a Cultural Values Assessment (CVA) for the Project, which is available to the Panel. The CVA outlines Te Ākitai Waiohua historical, spiritual and cultural associations across the extent of the whole project area.

Te Ākitai Waiohua is not opposed to the Project but expects that any adverse effects of development on cultural values are avoided, remedied or mitigated. Te Ākitai Waiohua seek restoration and enhancement of te taiao to restore the mauri and leave the environment in a better state than it was before development occurred.



2. Comments

Te Ākitai Waiohua acknowledges the partnership with NZTA for the Project and the engagement that has occurred during the development of the fast-track application. The scale of the Project is significant and Te Ākitai Waiohua acknowledges and appreciates the resourcing of a planning consultant to assist with the review of the draft technical reports and fast-track application prior to lodgement.

The Project impacts Te Ākitai Waiohua Treaty settlement redress land, including Statutory Acknowledgements, Statements of Association and a collective Right of First Refusal land opportunity. The comments below focus on outstanding issues of concern to Te Ākitai Waiohua regarding adverse effects on cultural values, specifically in relation to Treaty redress land at Arch Hill Scenic Reserve and Te Kukūnga Waka (the Carrington Unitec residential development). Some further comments relevant to conditions are provided in Attachment 1.

Te Tiriti o Waitangi

The accelerated process has resulted in insufficient understanding of the full impact on cultural effects. While the pace is acknowledged, it does not justify omission of fundamental Treaty obligations or robust cultural safeguards.

The Application fails to properly recognise Te Ākitai Waiohua Treaty settlement redress, including a statutory acknowledgement and collective Right of First Refusal, despite these being central to the Project context. Te Ākitai Waiohua expects Treaty redress to be specifically and explicitly provided for in the conditions. Where statutory acknowledgements and cultural redress apply, a higher standard of recognition, engagement and protection is required.

Te Kukūnga Waka

Te Kukūnga Waka is a significant large-scale urban development that collectively involves Marutūāhu, Ngāti Whātua and Waiohua-Tāmaki Alliance as the three Mana Whenua rōpū of Tāmaki Makaurau. This opportunity over the Unitec Carrington residential development land was provided by Right of First Refusal and forms part of the collective Treaty redress for Ngā Mana Whenua o Tāmaki Makaurau.

Te Ākitai Waiohua is concerned that the Project fails to recognise the strategic importance of Te Kukūnga Waka. The Project needs to respond to and support the significant residential growth that will be delivered, including consideration of how residents will travel to and access the station at Rangimatarau (Point Chevalier). The correct assumptions for residential growth anticipated at Te Kukūnga Waka must be relied upon, which is currently unclear from the Application.

The Project needs to align infrastructure delivery with Treaty settlement outcomes, such as Te Kukūnga Waka. A condition is sought that recognises and supports Te Kukūnga Waka.

Arch Hill Scenic Reserve

As a statutory acknowledgement area, Arch Hill Scenic Reserve is formal Treaty redress, requiring explicit recognition and meaningful influence over decision-making. Te Ākitai Waiohua is concerned that Arch Hill is not recognised as a statutory acknowledgement with a design-phase only condition that lacks enforceable outcomes and does not provide any meaningful protection of cultural values.



The conditions should reflect that Te Ākitai Waiohū is the only iwi with a statutory acknowledgement and statement of association over Arch Hill Scenic Reserve.

The Application (Part B) identifies that inputs into the alignment considerations included “*support of options which use Arch Hill Reserve (noting the impacts to the culturally significant area) because of the opportunity to avoid impacts to homes and people on the southern side of SH16*” (Table 16-1). No such decision has been made at a governance level and further understanding of adverse effects and appropriate mitigation measures is required.

New NOR Condition 26A is acknowledged as it specifically addresses the native vegetation at Arch Hill Scenic Reserve. However, the condition does not refer to the statutory acknowledgement or significance of the site to Te Ākitai Waiohū.

Given the high-level design of the Project at this stage, there is insufficient information to fully understand the effects on Arch Hill Scenic Reserve. Therefore, a specific condition is needed to provide for the statutory acknowledgement and that ongoing engagement with Te Ākitai Waiohū is required to address adverse impacts on cultural values.

Cultural values conditions

Te Ākitai Waiohū acknowledges the existence of NOR Conditions (5 – 7) but does not agree that they adequately address adverse effects on cultural values. The conditions are limited by their focus on engagement during detailed design to identify how cultural values will be reflected.

The conditions fail to address impacts on cultural values across the full life cycle of the Project, nor what will be done to address the cultural values other than reflect them. The conditions do not require avoidance, mitigation or enhancement and is not a genuine effects management tool.

It is not accepted that conditions addressing cultural values are *augier* or offered because they are required to ensure that actual and potential adverse impact on cultural values are avoided, remedied or mitigated. This is yet to be demonstrated because the application doesn’t contain sufficient detail to understand the scale of effects on cultural values.

The requirement for Te Ākitai Waiohū to engage under a combined or shared condition with other iwi is not supported. This directly contradicts both the CVA and the full extent of Te Ākitai Waiohū interests across the project area.

NOR Condition 7 confines Te Ākitai Waiohū involvement to selected geographic sections. This approach dilutes Mana Whenua authority and obscures distinct Treaty-based rights and is also not supported.

Te Ākitai Waiohū expects standalone conditions, reflecting its specific status, interests, and obligations throughout the Project’s life cycle:

- Adverse impacts on cultural values must be identified, avoided, remedied, or mitigated across all phases of the project (pre-design, design, construction, and operation).
- The current approach reflects a minimal compliance model, rather than ensuring outcomes that “leave the environment better than it was”.



- The expectation is for enduring, project-wide conditions that embed cultural values throughout.

3. Conclusion

Te Ākitai Waiohua have reviewed the fast-track application and does not oppose the Project, recognising it will deliver important strategic public transport. However, a conditions framework is required to properly recognise and give effect to Treaty settlement obligations, statutory acknowledgements, and the enduring cultural relationship of Te Ākitai Waiohua with the project area.

Ngā mihi,

Te Ākitai Waiohua Settlement Trust

Email: [REDACTED]

Attachment 1: Further comment relevant to conditions



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Issue	Conditions	Comments
<p>Outstanding Natural Feature – Meola Creek (ID95)</p>	<p>NOR 24</p>	<p>Meola Creek is a scheduled ONF of significant cultural value to Te Ākitai Waiohūa. It is acknowledged that the Project seeks to bridge the creek to avoid impacts on the ONF, supported by NOR Condition 24. However, it is unacceptable that condition 24 does not restrict constructing piers within the ONF.</p> <p>Under the Auckland Unitary Plan, development of buildings and structures on the Meola Creek ONF is a non-complying activity. The application does not adequately assess the potential impacts of piers on the ONF and how effects would be appropriately mitigated, including addressing Policies 10.3(3) and (4).</p> <p>If it is not possible to avoid piers within the Meola Creek ONF then impacts need to be minimised and appropriate consideration of the effects and mitigation should be required by the condition as part of the outline plan of works.</p>
<p>Archaeological Authority No.2</p>	<p>7, 10, 11, 12, and 13</p>	<p>Consistent with the comments in the body of the letter on cultural values. Te Ākitai Waiohūa does not accept conditions that require engagement under a combined or shared condition with other iwi. Particularly where the archaeological authority relates to Arch Hill Scenic Reserve, which is a statutory acknowledgement area. No other iwi has statutory acknowledgement over the reserve.</p>
<p>Corridor Integration Design Framework</p>	<p>-</p>	<p>NZTA have committed to working with mana whenua / iwi to provide a cultural narrative through the Corridor Integration Design Framework (CIDF), identified as a NZTA internally led process. Te Ākitai Waiohūa supports the development of a CIDF as an important tool to identify and respond to the adverse impacts on cultural values but is concerned that the NOR conditions do not require this.</p> <p>The long-term nature of the Project increases uncertainties about how effects on cultural values will be mitigated. Requiring a CIDF as an NOR condition ensures that impacts will be considered at the outline plan of works stage, supporting not only the incorporation of cultural narratives but also in the</p>



		<p>landscaping and urban design.</p> <p>The following outcomes should be included in the CIDF as a minimum:</p> <ul style="list-style-type: none">• Access to Pt Chevalier Station from Carrington Road to support development of the Unitec site;• Opportunities to recognise and acknowledge Te Ākitai Waiohua's cultural landscape through design (e.g. stations) and naming;• Management of actual and potential effects on Arch Hill Scenic Reserve Statutory Acknowledgement Area; and• Mitigation for for any impacts on outstanding natural features.
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