



ĀTIAWA KI WHAKARONGOTAI CHARITABLE TRUST

To: Fast-track Referrals team
From: Ātiawa ki Whakarongotai Charitable Trust
Date: 28/07/2026

Re: CRM:0139018524 New Central Park Referral Application

1. Introduction

This letter provides comments from Ātiawa ki Whakarongotai Charitable Trust ("the Trust") regarding the referral application for the proposed New Central Park Development ("the Application").

The Trust represents the interests of Te Ātiawa ki Whakarongotai for the purposes of resource management and environmental decision-making within our rohe. Our comments are provided in our capacity as mana whenua and kaitiaki and are informed by the values and objectives contained within our Kaitiakitanga Plan, 'Whakarongotai o te moana, Whakarongotai o te wā'.

At the outset, the Trust notes that Te Ātiawa ki Whakarongotai and Puketapu ki Paraparaumu Hapū maintain strong ancestral, cultural, spiritual, and historical connections to the whenua subject to this Application. These connections pre-date contemporary land ownership boundaries and continue regardless of the current use of the site.

For the purposes of the referral application, the Trust neither supports nor opposes referral of the proposal into the Fast-track Approvals process. However, we have significant concerns regarding aspects of the proposal and consider that a number of matters require careful assessment, engagement, and potential refinement through the substantive application process.

While we acknowledge potential benefits associated with increased housing supply, employment opportunities, commercial activity, public amenities, and ecological restoration initiatives proposed within the development, these benefits must be balanced against the potential cultural, environmental, and intergenerational consequences associated with the scale of landscape transformation proposed.

Our comments are outlined below under a number of key themes.

2: Whakapapa ki te Whenua

The relationship between Te Ātiawa ki Whakarongotai, Puketapu Hapū, and this whenua extends far beyond contemporary land ownership and development patterns. The site forms part of a wider ancestral landscape that continues to hold cultural, historical, and spiritual significance for mana whenua. The Trust considers that the substantive application should carefully assess and respond to the effects of the proposal on cultural values, heritage, and the ongoing relationship of mana whenua with this place.

2.1 Cultural Values

The Trust is concerned by the scale of permanent landscape modification proposed across the site.

The development involves the conversion of a significant area of undeveloped land into residential, commercial, transport, and associated infrastructure. While urban development is not inherently incompatible with mana whenua values, the scale of the proposed transformation raises concerns regarding the ongoing relationship between iwi and hapū and their ancestral whenua.

Historically, the whenua within and surrounding the site formed part of a broader cultural landscape utilised for settlement, transport, mahinga kai, resource gathering, and cultural practices. Much of this landscape has already been substantially modified through previous development and land use change.

The Trust is concerned that the further subdivision of land into private ownership and urban form may contribute to:

- Further separation of mana whenua from ancestral landscapes.
- Reduced opportunities for cultural connection and customary use.
- Loss of visible cultural association within the landscape.
- Diminished recognition of mana whenua presence and identity.
- Erosion of historical and cultural narratives associated with the area.
- Reduced ability to exercise kaitiakitanga responsibilities.

These matters warrant detailed assessment through the substantive application process, including consideration of how cultural identity and connection can be maintained and enhanced within the development.

Recommendation: The substantive application should demonstrate how cultural values, narratives, and connections to place will be recognised, protected, and expressed throughout the development. This should be achieved through co-design with mana whenua to ensure these values are embedded throughout the site design.

Responses to adverse effects on cultural values should follow the effects management hierarchy, seeking first to avoid effects, then minimise or remedy effects where avoidance is not practicable, before considering offsetting or compensation measures.

2.2 Cultural Heritage and Archaeological Values

The Trust notes the potential for previously unidentified cultural heritage values to exist within the site.

Given the scale of proposed earthworks and ground disturbance, there remains potential for:

- Archaeological material.
- Wāhi tapu.
- Kōiwi tūpuna.
- Culturally significant artefacts and taonga.

The Trust expects these matters to be comprehensively addressed through the substantive application process and through ongoing engagement with mana whenua.

Recommendation: The substantive application should include appropriate archaeological assessment, accidental discovery protocols, cultural monitoring provisions where required, clear procedures relating to the discovery of kōiwi tangata, and mana whenua involvement in heritage management planning.

3: Te Taiao

The Trust notes that several natural features within and adjacent to the site may be modified as a result of the proposal. At this stage, insufficient assessment has been undertaken to fully understand the cultural, ecological, and landscape values associated with these features, or the opportunities that may exist to enhance environmental outcomes through the substantive application process. The Trust considers it important that the referral decision provides sufficient scope for these matters to be fully explored as the project progresses.

3.1 Te Manga o Wharemauku

The Wharemauku Stream is of significant cultural, historical, and environmental importance to Te Ātiawa ki Whakarongotai and Puketapu Hapū.

The Trust notes that previous iterations of the proposal included consideration of the realignment and naturalisation of sections of the Wharemauku. While these elements are not included in the current referral application, we are concerned that the scope of

any referral decision may unintentionally limit the extent to which naturalisation options can be explored through the substantive application process.

Given the scale of the proposed development and the significance of the Wharemauku, the Trust considers it important that opportunities for restoration and naturalisation remain available for assessment as the project progresses. This would allow further technical investigation, engagement with mana whenua, and consideration of wider environmental and cultural benefits before long-term development outcomes are determined.

The Trust is not seeking that naturalisation be incorporated into the referral application itself. Rather, we seek to ensure that the referral decision does not unnecessarily constrain future consideration of naturalisation opportunities through the substantive application process.

Recommendation: That the decision on the referral application should provide sufficient scope to enable potential naturalisation of the Wharemauku to be considered as part of any substantive application.

3.2 Dune Systems

The Trust notes that the proposal may result in the modification or removal of existing dune features within the site. Dune systems form part of the wider cultural and environmental landscape and contribute to the historical character, ecological functioning, and natural processes of the area.

At this stage, the Trust has not undertaken sufficient assessment to determine the significance of the affected dune features or the appropriateness of the proposed works. However, given the permanent nature of these changes, we consider it important that the substantive application retains sufficient scope to fully assess the values associated with these landforms and explore potential options for their management.

Recommendation: That the decision on the referral application should provide sufficient scope to enable the cultural, ecological, and landscape values of the site's dune systems to be assessed, and any opportunities for their protection, restoration, or integration into the development to be considered as part of the substantive application.

3.3 Waterways and Drainage Features

The Trust notes that an existing drainage channel within the site is proposed to be realigned and incorporated into the site's stormwater management system. The

channel forms part of the wider hydrological network associated with the site and may have cultural, environmental, and ecological values that require further assessment.

At this stage, the Trust has not undertaken sufficient assessment to determine the extent of any cultural, environmental, or ecological values associated with this feature, or whether opportunities exist to achieve improved outcomes through its future design and management.

The Trust considers it important that the substantive application retains sufficient flexibility to explore these matters further, including the relationship of the channel to wider restoration, ecological enhancement, water quality, and cultural aspirations for the site.

Recommendation: That the decision on the referral application should provide sufficient scope to enable the future function, design, and management of the drainage channel to be further assessed through the substantive application process, including opportunities to enhance cultural, environmental, and ecological outcomes.

3.4 Wetland Enhancement

The Trust acknowledges and welcomes the inclusion of wetland restoration within the proposal.

Wetlands are culturally and environmentally significant ecosystems that historically supported important ecological functions, customary practices, and indigenous biodiversity. However, they should not be considered in isolation. The site contains a range of interconnected natural features, including wetlands, waterways, drainage features, and remnant dune systems, all of which contribute to the wider ecological and cultural landscape.

The Trust considers there may be opportunities to enhance outcomes across these interconnected systems through the substantive application process and encourages a holistic, catchment-scale approach to their assessment and design.

The substantive application should demonstrate how restoration efforts contribute to:

- Enhancement of mauri.
- Improved ecological integrity.
- Improved water quality.
- Habitat creation for indigenous species.
- Restoration of hydrological processes.
- Connectivity between wetlands, waterways, dune systems, and surrounding habitats.

The Trust particularly encourages consideration of taonga species and opportunities for mana whenua participation in restoration planning, implementation, and monitoring.

Recommendation: Ecological restoration should be approached at a landscape scale and integrated across wetlands, waterways, stormwater systems, and surrounding ecological habitats. Restoration should be co-designed with the Trust and emphasise mana whenua values.

4. Tino Rangatiratanga

The Trust considers that achieving positive outcomes for this proposal will depend not only on the design of the development itself, but also on the extent to which mana whenua are able to actively participate in decision-making, design, restoration planning, and long-term management. Meaningful expression of tino rangatiratanga requires opportunities for influence throughout the life of the project, rather than consultation occurring after key decisions have already been made.

4.1 Meaningful Mana Whenua Participation

The Trust considers that meaningful engagement is critical to achieving positive outcomes through the Fast-track process.

Given the significance of the proposal, mana whenua engagement should extend beyond consultation and provide genuine opportunities to influence project design, environmental outcomes, cultural outcomes, and long-term management arrangements.

The Trust expects ongoing involvement through:

- Preparation of a Cultural Impact Assessment.
- Review of technical reports.
- Development of consent conditions.
- Restoration planning.
- Cultural design processes.
- Environmental management planning.

Recommendation: The Applicant should continue working with the Trust and Puketapu Hapū throughout preparation of the substantive application and ensure opportunities for meaningful participation are embedded within the project.

4.2. Long-Term Stewardship and Governance

The Trust encourages consideration of long-term governance and stewardship arrangements for environmental restoration areas created through the project.

This may include exploration of:

- Co-governance arrangements.
- Mana whenua legal ownership of taonga sites (e.g. wetlands, dunes, awa).
- Co-management approaches.
- Stewardship partnerships.
- Vesting arrangements where appropriate.
- Ongoing mana whenua involvement in restoration and monitoring activities.

The Trust considers that long-term environmental outcomes are more likely to be achieved where mana whenua remain actively involved beyond the construction phase.

Recommendation: The substantive application should explore opportunities for long-term governance and stewardship arrangements that enable ongoing mana whenua participation in the management, restoration, and monitoring of environmental and cultural values associated with the site.

5. Conclusion

The Trust neither supports nor opposes referral of the Application into the Fast-track approvals process.

However, we consider that the proposal raises significant cultural, environmental, and intergenerational considerations that require detailed assessment through the substantive application stage.

In particular, we consider further work is required in relation to:

- Protection and enhancement of mana whenua values.
- Long-term opportunities for Wharemauku restoration and naturalisation.
- Future opportunities relating to dune systems, waterways, and drainage features.
- Landscape-scale ecological restoration.
- Cultural heritage management.
- Meaningful mana whenua participation.
- Long-term stewardship and governance arrangements.

The Trust looks forward to continuing engagement with the Applicant and contributing to the development of a substantive application that better reflects the cultural responsibilities, environmental aspirations, and kaitiakitanga obligations of Te Ātiawa ki Whakarongotai and Puketapu Hapū.

Nāku noa, nā

Dr Liam McAuliffe

Kairuruku Taiao

Ātiawa ki Whakarongotai Charitable Trust