

**BEFORE THE FAST-TRACK APPROVALS
EXPERT PANEL**

FTAA-2512-1158

UNDER the Fast-track Approvals Act 2024 ("**FTAA**")

AND

IN THE MATTER of an application for approvals by Precinct Properties Holdings Limited ("**Applicant**" or "**Precinct**") in relation to the proposed Downtown Carpark Redevelopment ("**Application**")

MEMORANDUM OF COUNSEL

24 MARCH 2026



Counsel instructed:
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MAY IT PLEASE THE PANEL:

1. This memorandum of counsel sets out the relevant parties that the Applicant considers the Panel may wish to invite to comment on the Application in accordance with s 53 of the FTAA.

Statutory parties

2. The Applicant considers the Expert Panel should invite comments from the following parties:¹
 - (a) Auckland Council as the relevant local authority.
 - (b) Ngāti Tamaterā, Ngāti Te Ata, Ngāti Whanaunga, Te Patukirikir, Ngāi Tai ki Tāmaki, Ngāti Maru, Ngāti Pāoa, Ngāti Tamaoho, Ngāti Whātua o Kaipara, Te Ahiware – Waiohua, Te Kawerau ā Maki, Te Rūnanga o Ngāti Whātua, and Waikato – Tainui, being the relevant iwi authorities identified by Auckland Council with an interest in the Application area. Ngāti Whātua Ōrākei has been specifically consulted with but in the context of being project partner with Precinct.
 - (c) The Minister for the Environment as the relevant portfolio Minister and administering agency, and Heritage New Zealand Pouhere Taonga as the relevant administering agency.

Owners and occupiers of the site and adjacent land

3. The Application site is the Downtown Carpark at 2 Lower Hobson Street.²
4. Section 53(2)(h) and (i) require the Expert Panel to invite comments from the owners and occupiers of site and the land adjacent to the site. The Applicant has done significant work to identify these relevant parties.

¹ FTAA section 53(2)(a), (b), (j) and (k). For completeness, it is noted that sections 53(2) (c), (d), (e), (f), (g), (l) and (m) are not relevant to this Application.

² The Assessment of Environmental Effects dated 18 December 2025 at [1.0] identifies the site address as 2 Lower Hobson Street (Downtown Carpark), 29 Customs Street West (AON), and 188 Quay Street (HSBC). The AON and HSBC buildings were identified as part of the site for completeness due to the works proposed in the service lane and the podium that runs between these buildings and the Downtown Carpark. However, no surface disturbance will occur at or on the AON and HSBC buildings, with the physical works being limited to the Downtown Carpark site and the service lane. As such, AON and HSBC are treated as "adjacent" to the site.

5. As the Expert Panel will appreciate, owing to the nature of the site being in the Auckland CBD, there are a significant number of owners and occupiers of both the Application site itself, and land adjacent to the Application site. Precinct has endeavoured to identify these parties as comprehensively as is reasonably possible. These are set out in **Appendix 1** to this memorandum. An accompanying map is provided in Figure 1 of Appendix 1 showing where each owner/occupier is located.

Owners and occupiers of the Application site

6. In respect of owners and occupiers of the Application site itself, Precinct is the owner of the Application site (being the Downtown Carpark at 2 Lower Hobson Street). The Applicant considers the Expert Panel should invite comments from the current occupiers of the Downtown Carpark, who are largely monthly licence holders for car parking spaces. A list of the current occupants is contained in **Appendix 1** (reference 11).

Adjacent owners and occupiers

7. Precinct is the owner of adjacent sites 29 Customs Street West and 188 Quay Street (the AON Building and HSBC Tower).
8. The Applicant considers that the Expert Panel should invite comments from the following owners and occupiers adjacent to the site (a list of adjacent owners and occupiers is contained in Appendix 1, references 1-10):
- (a) 139 Quay Street (owned by Dockland Shed Leases Limited, with various retail and business tenants);
 - (b) 175 Quay Street (owned by Auckland Council and Tataki Auckland Unlimited Limited, occupied by the Maritime Museum and food /beverage tenants);
 - (c) 85 Customs Street West (owned by Viaduct Harbour Holdings Limited ("**VHHL**"), occupied by The Sebel);
 - (d) 100 Customs Street West (owned by Auckland Council and occupied by the Tepid Baths);
 - (e) 16 Fanshaw Street (owned by Picadilly Trustee Limited, with various business tenants);
 - (f) 1 Albert Street (owned by Quattro Re Limited (Kyndryl Tower) with various business and food/beverage tenants);

- (g) 29 Customs Street West and 188 Quay Street (the AON Building and HSBC Tower, owned by Precinct with various business and food and beverage tenants);
- (h) 204 Quay Street (owned by VHHL, with largely food/ beverage tenants);
- (i) 196-200 Quay Street (owned by Millennium & Copthorne Hotels New Zealand Limited and occupied by the M Social Hotel).

9. While it has been possible for Precinct to identify all relevant owners of adjacent sites and also some of the occupiers of those sites, given the large volume of potential tenanted properties/spaces and that Precinct does not own, it is acknowledged that it has not been possible for Precinct to identify every single occupier of those sites. Precinct is very happy to offer what assistance it can to the Panel in this regard moving forward.

DATED: 24 March 2026



Simon Pilkinton | Louise Espin
Counsel for Precinct Properties Holdings Limited

Appendix 1

Owners and Occupiers of the Sites and Land Adjacent

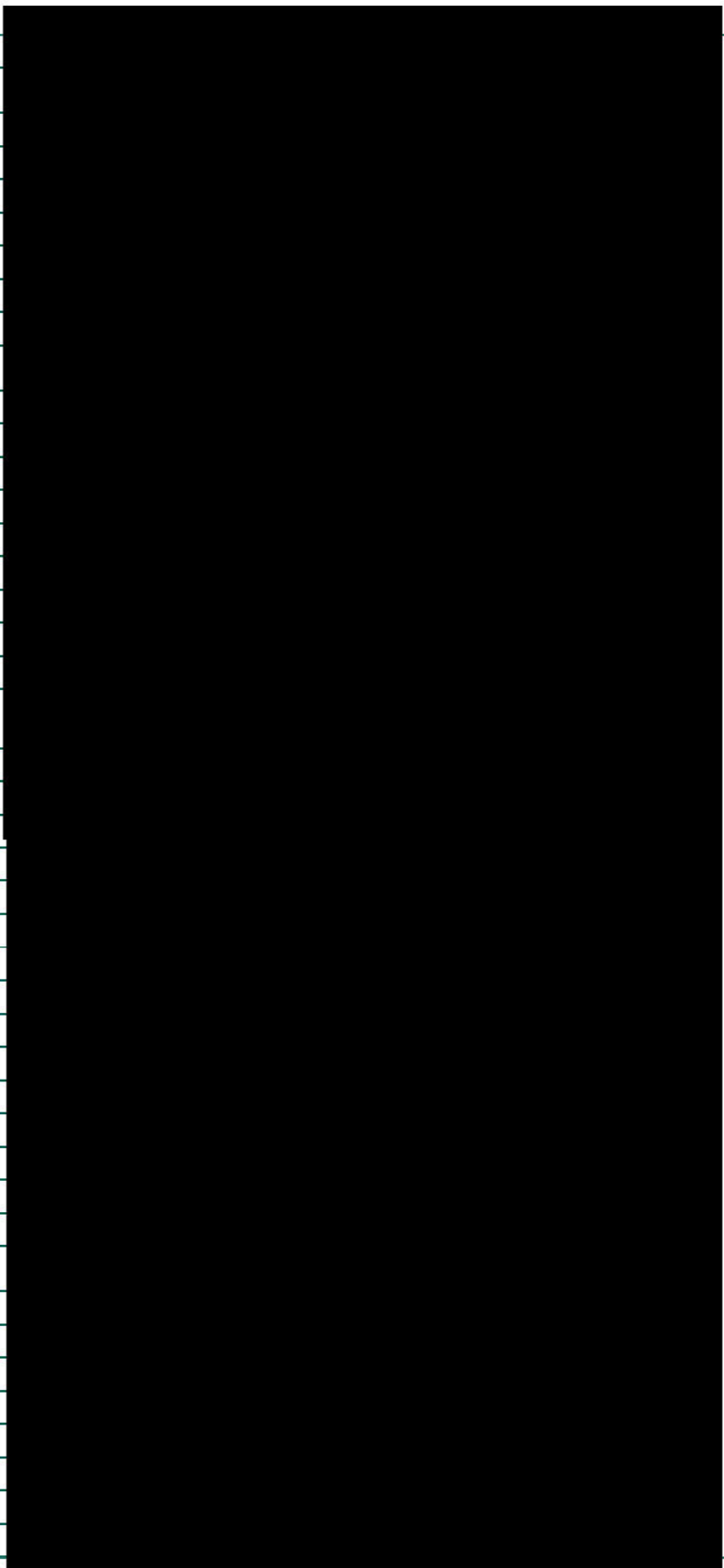
Reference to Figure 1 below	Address	Legal Description	Owner(s)	Occupier/ Tenant	Contacts Received	Contact Date and Notes
1	139 Quay Street	Lot 20 Deposited Plan 191790 and at Reduced Level RL 3.75m Lot 20 Deposited Plan 191790 and at Reduced Level RL 7.66m	Dockland Shed Leases Limited	<p>Level 3:</p> <ul style="list-style-type: none"> • PSC Insurance Brokers NZ • PSC Connect Life NZ • Kauri NZ Investment • Oravida Ltd • OK Gift Shop (Office) • Ok Gift Shop (Warehouse) <p>Level 4:</p> <ul style="list-style-type: none"> • Education First (EF) <p>Level 6:</p> <ul style="list-style-type: none"> • NZ Trade and Enterprise • Ministry of Foreign Affairs and Trade • Invest New Zealand • New Zealand Story <p>Level 7:</p> <ul style="list-style-type: none"> • Kainga Ora/LEAD Alliance <p>Level 8:</p> <ul style="list-style-type: none"> • Servcorp • Trip.com NZ Limited • Intelia NZ • FAMNZ • Earcon Acoustics • Datagrid NZ • MyFuture • PowerHub Group • Tahiti Voyages • PSC Consulting NZ • [REDACTED] 	[REDACTED]	<p>Initial letter drop was on 16/10/2025 to all owners/ occupiers.</p> <p>Follow up on the initial letter drop was conducted on 23/10/2025 to confirm that letter had been received by relevant parties.</p>
2.	175 Quay Street	Lot 3 Deposited Plan 153316	Auckland Council Tataki Auckland Unlimited Limited	<p>Ground Level</p> <ul style="list-style-type: none"> • New Zealand Maritime Museum • The Lula Inn • White and Wongs <p>Level 1</p> <ul style="list-style-type: none"> • Sero Inspiring Occasions • The Maritime Room 	No contact details were received from the owner or occupants.	<p>Initial letter drop was on 16/10/2025 to the Lula Inn, White and Wongs and Maritime Museum.</p> <p>The Sero Occasions and the Maritime Room are on Level 1 and have restricted to public access thus the letters were given to the general manager to circulate.</p>
3.	85 Customs Street West		Viaduct Harbour		[REDACTED]	

	Auckland Central, Auckland, Auckland					Follow up on the initial letter drop was conducted on 23/10/2025 to confirm that letter had been received by relevant parties.
5.	16 Fanshawe Street, Auckland Central, Auckland	Lot 1 Deposited Plan 112556	Piccadilly Trustee Limited	<p>Ground Level</p> <ul style="list-style-type: none"> The Common Room <p>Level 1</p> <ul style="list-style-type: none"> Streamlined Litigation Support <p>Level 2</p> <ul style="list-style-type: none"> Nectar NZ Change Financial MEA/ Margules Groome/ Cranleigh Partners <p>Level 3 Strategic Pay</p> <ul style="list-style-type: none"> Altis Consulting NZ Ltd <p>Level 4</p> <ul style="list-style-type: none"> Information Leadership F5 Networks – Generator <p>Level 5</p> <ul style="list-style-type: none"> Tenzing – Management & Technology Consultants <p>Level 6</p> <ul style="list-style-type: none"> Voco Business/ Digital Transformation Consultants Assurity Consulting <p>Level 7</p> <ul style="list-style-type: none"> Push Digital Ltd <p>Level 8</p> <ul style="list-style-type: none"> Inugo Systems Covington Group McElroys <p>Level 10</p> <ul style="list-style-type: none"> WTW <p>Level 11</p> <ul style="list-style-type: none"> WPP Media Reception/ Essence Mediacom/ Wavemaker/ Mindshare 	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>No other contact details were received from the owner or occupants.</p>	<p>Initial letter drop was on 16/10/2025:</p> <ul style="list-style-type: none"> The common room – No one there (Café closed). Left letter at counter. Streamlined litigation support - Received Nectar NZ – Received Change Financial – Didn't deliver (Business not in building) Insight NZ – Didn't deliver (Business not in building) MEAA/Margules Groome/Cranleigh Partners - Received Strategic Pay - Received Altis Consulting NZ - Received Information leadership - Received F5 Networks – Generator - Received Tenzing – Management & Technology Consultants - Received Assurity Consulting – Couldn't deliver – level restricted by key card access. Push Digital Lts t/a timbre digital - Received McElroys - Received WTW - Received WPP Media Reception plus our media brands – Received <p>Follow up on the initial letter drop was conducted on 23/10/2025 to confirm that letter had been received by relevant parties and request for letter to be circulated if not.</p>
6.	1 Albert Street, Auckland Central	Lot 2 Deposited Plan 552420	Quattro Re Limited	<p>Level 2</p> <ul style="list-style-type: none"> Afrimo Anthem GreenMount JC Legal Omnibridge vdX.tv WNT Ventures 	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	<p>Letters dropped off on 16/10/2025 at reception with request for the receptionist to circulate to all tenants. All offices are restricted by key card access thus could not conduct letter drop personally.</p>

			<ul style="list-style-type: none"> • Gents and Rascals 	[REDACTED]	
			Level 2	[REDACTED]	
			<ul style="list-style-type: none"> • Sushi Pac 	[REDACTED]	
			Level 3	[REDACTED]	
			<ul style="list-style-type: none"> • i-site 	[REDACTED]	
			Level 4	[REDACTED]	
			<ul style="list-style-type: none"> • Baguette & Co • Toasty • Mojo 	[REDACTED]	
			Level 5	[REDACTED]	
			<ul style="list-style-type: none"> • N/A 	[REDACTED]	
			Level 6	[REDACTED]	
			<ul style="list-style-type: none"> • N/A 	[REDACTED]	
			Level 7	[REDACTED]	
			<ul style="list-style-type: none"> • Australian Consulate 	[REDACTED]	
			Level 8	[REDACTED]	
			<ul style="list-style-type: none"> • Serious Fraud Office 	[REDACTED]	
			Level 9	[REDACTED]	
			<ul style="list-style-type: none"> • MCVeagh Flemming 	[REDACTED]	
			Level 10	[REDACTED]	
			<ul style="list-style-type: none"> • National Infrastructure • Kiely Thompson Caisley 	[REDACTED]	
			Level 11	[REDACTED]	
			<ul style="list-style-type: none"> • ICBC 	[REDACTED]	
			Level 12	[REDACTED]	
			<ul style="list-style-type: none"> • Precinct Properties 	[REDACTED]	
			Level 13	[REDACTED]	
			<ul style="list-style-type: none"> • McKinsey 	[REDACTED]	
			Level 14	[REDACTED]	
			<ul style="list-style-type: none"> • Hesketh Henry 	[REDACTED]	
			Level 15	[REDACTED]	
			<ul style="list-style-type: none"> • Lowndes Jordan • Cash Converters 	[REDACTED]	
			Level 16	[REDACTED]	
			<ul style="list-style-type: none"> • JLL 	[REDACTED]	
			Level 17	[REDACTED]	
			<ul style="list-style-type: none"> • UBS • Murray & Co • Vital Healthcare • Devon Funds • Webb Henderson 	[REDACTED]	
			Level 18	[REDACTED]	
			<ul style="list-style-type: none"> • Buddle Findlay 	[REDACTED]	

			<p>Level 19</p> <ul style="list-style-type: none"> • N/A <p>Level 20</p> <ul style="list-style-type: none"> • BlackBull Markets • Martelli McKegg <p>Level 21</p> <ul style="list-style-type: none"> • N/A <p>Level 22</p> <ul style="list-style-type: none"> • HSBC <p>Level 23</p> <ul style="list-style-type: none"> • Colliers Auckland <p>Level 24</p> <ul style="list-style-type: none"> • Unispace <p>Level 25</p> <ul style="list-style-type: none"> • Rothbury <p>Level 26</p> <ul style="list-style-type: none"> • Oceania Healthcare <p>Level 27</p> <ul style="list-style-type: none"> • N/A <p>Level 28</p> <ul style="list-style-type: none"> • FirstCape Level 29 • Fortuna Forest <p>Companies on unspecified floors</p> <ul style="list-style-type: none"> • Unknown • ACC • Contact Energy • Waikato Tainui 		
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				[REDACTED]
				Allevia Radiology
				Altoworks Limited
				[REDACTED]
				[REDACTED]
				Aon NZ AKL
				Aotea Holdings NZ Limited
				Arbee & Co Limited
				Arrakis Alpacas Limited [REDACTED]
				[REDACTED]
				[REDACTED]
				[REDACTED]
				[REDACTED]
				[REDACTED]
				Bracewell Limited t/a Bracewell Construction
				[REDACTED]
				[REDACTED]
				Buddle Findlay Limited
				Calder Stewart Shared Services
				[REDACTED]
				Canting Trader Limited
				[REDACTED]
				[REDACTED]
				Catalyst Group
				Catch Design Limited [REDACTED]
				Cha & Berry Limited
				[REDACTED]
				[REDACTED]
				[REDACTED]
				[REDACTED]
				[REDACTED]
				[REDACTED]
				CityHop - Greys Ave/Broadway/Ronayne
				Clearcut Consultants Limited
				Codeops Limited-
				Connexa
				[REDACTED]
				Copia Products Limited
				CP Hotels Limited
				CTM Consulting Ltd Attn
				Cushman & Wakefield New Zealand Limited
				Customs Solutions 2007 Limited
				Cyril Wright Artspex New Zealand Limited
				Daikoku Restaurant Ltd
				[REDACTED]



				[REDACTED]
				[REDACTED]
				[REDACTED]
				[REDACTED]
				[REDACTED]
				Design Denmark NZ Limited [REDACTED]
				[REDACTED]
				[REDACTED]
				[REDACTED]
				EcoMatters Environment Trust
				[REDACTED]
				Eggmoney LTD
				Electrix Limited t/a Omexom
				[REDACTED]
				[REDACTED]
				[REDACTED]
				[REDACTED]
				Falafel Federation Limited
				Ferry Building Limited
				[REDACTED]
				[REDACTED]
				[REDACTED]
				[REDACTED]
				French Country Collections Limited
				Fullers Group Limited
				[REDACTED]
				German Fernandez Trelles LTD
				[REDACTED]
				[REDACTED]
				Hampton Jones Property Consultancy Limited
				Hansangmi Fresh Food Limited
				Happy Valley Women&Children's Foundation
				[REDACTED]
				[REDACTED]
				Heaney & Co
				Hesketh Henry NZ
				HOT Trading Ltd
				House of Travel Auckland City Ltd
				[REDACTED]
				[REDACTED]
				[REDACTED]
				[REDACTED]
				[REDACTED]
				[REDACTED]
				JC Legal Limited [REDACTED]
				[REDACTED]



				[REDACTED]
				NZ Upstream Limited
				OCN Gourmet Limited
				OK Gift Shop LTD
				Outside In Ltd [REDACTED]
				[REDACTED]
				[REDACTED]
				[REDACTED]
				[REDACTED]
				Precinct Properties Holdings Limited
				[REDACTED]
				[REDACTED]
				Qatar Airways Group (Q.C.S.C.)
				QBE Insurance (Australia) Limited Attention: Accounts
				[REDACTED]
				[REDACTED]
				Rebeck Dunn Watters Ltd
				[REDACTED]
				REFORM COMMERCIAL BAY LTD
				Remarkable Scaffolding Limited
				Resolvexo Aotearoa GP Limited
				[REDACTED]
				[REDACTED]
				[REDACTED]
				[REDACTED]
				S C Johnson & Son Proprietary Limited
				[REDACTED]
				[REDACTED]
				[REDACTED]
				Samp CND Limited
				[REDACTED]
				[REDACTED]
				Scoop Studio Limited
				[REDACTED]
				[REDACTED]
				[REDACTED]
				Shamrock Recruitment Group Ltd [REDACTED]
				[REDACTED]
				[REDACTED]
				Sir Peter Blake Charity Limited
				Soho Wine Company Limited
				[REDACTED]
				[REDACTED]
				[REDACTED]



				[REDACTED]
				Stormwater 360 T/A Enviropod NZ Limited
				Strata Title Administration
				Stunning Smiles Limited Attention: Roger Tiang
				[REDACTED]
				Tauranga Crossing Limited Attn: Andrew Campbell
				Tax Management New Zealand Limited
				TechLab NZ Limited
				[REDACTED]
				Telco Technology Services Limited
				Templeton Management Limited
				The Office
				Tomlinson & Associates Limited Attention: Michael
				Tranquillity Trustee Limited
				[REDACTED]
				W Horne T/A RGC Ltd
				[REDACTED]
				[REDACTED]
				We'ar righteous LTD
				[REDACTED]
				[REDACTED]
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				[REDACTED]
				[REDACTED]
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				[REDACTED]
				[REDACTED]

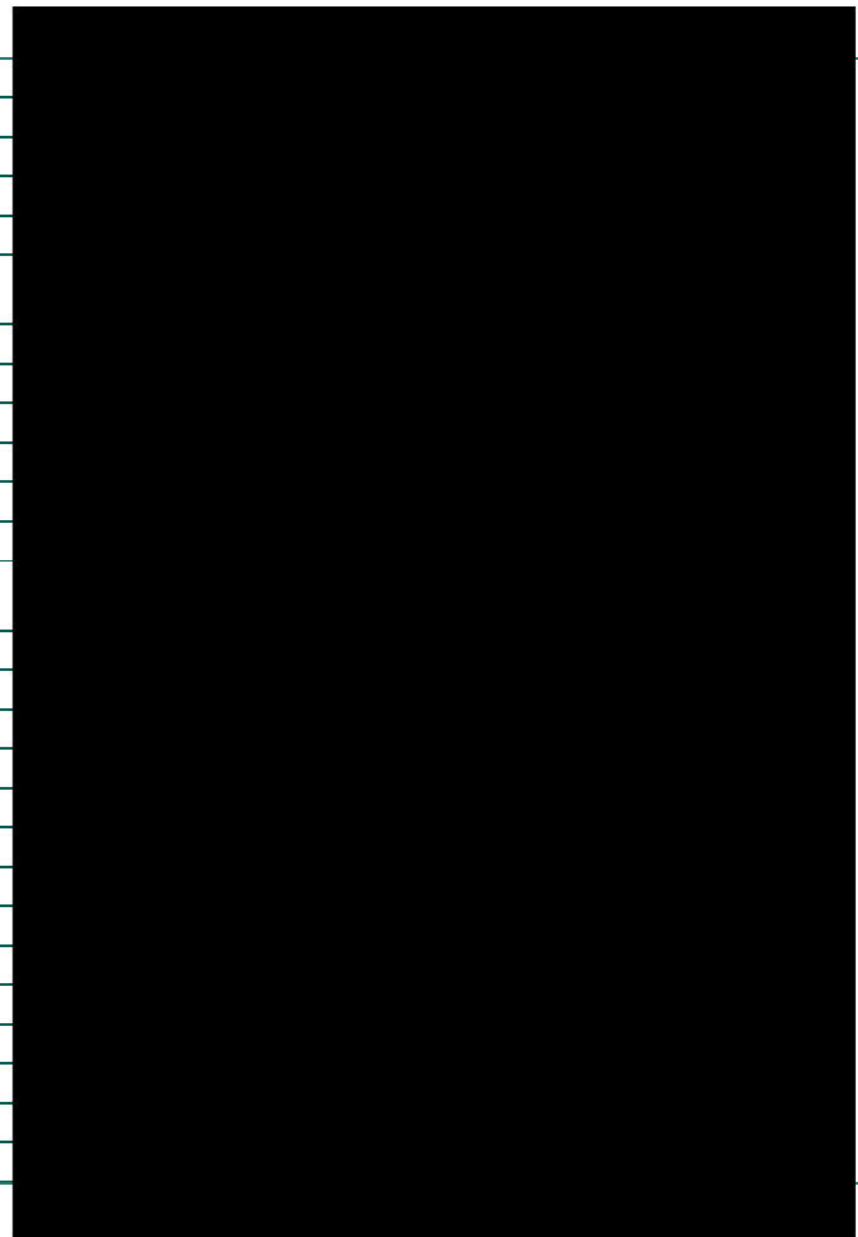




Figure 1. Adjacent neighbour location reference. Source: Auckland Council GIS and Barker & Associates.