

**BEFORE HEARING COMMISSIONERS DELEGATED BY FAR NORTH
DISTRICT COUNCIL / TE KAUNIHERA O TE TAI TOKERAU KI TE RAKI**

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the hearing of submissions on the Proposed Far North
District Plan

**STATEMENT OF EVIDENCE OF BEN GRANT DALTON FOR WAITANGI
LIMITED (SUBMITTER 503)**

HEARING 15B (REZONING – NEW SPECIAL PURPOSE ZONES)

30 May 2025

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1. INTRODUCTION

- 1.1 My name is Ben Grant Dalton. I am the Chief Executive of Waitangi Limited which is the operating company of the Waitangi National Trust Board (**Trust Board**). Waitangi Limited was established by the Trust Board in 2016 to manage the day-to-day operations of the Waitangi National Trust Estate (**Estate**) which contains the historic Waitangi Treaty Grounds / Te Pitowhenua (**Treaty Grounds**).
- 1.2 My evidence is given on behalf of Waitangi Limited (Submitter 503) in relation to the Proposed Far North District Plan (**Proposed Plan**).

2. EXPERIENCE

- 2.1 I am not giving independent expert evidence. To provide context for the Hearing Panel, my experience is as follows:
- (a) Chief Executive of Waitangi Limited (September 2023 to now);
 - (b) Chair of Tupu Tonu, Ngāpuhi Investment Fund;
 - (c) Deputy Chief Executive roles at the Ministry of Housing and Urban Development – Te Tūāpapa Kura Kāinga, the Ministry of Primary Industries, and the Ministry of Fisheries;
 - (d) Chief Operating Officer of Kānoa – the Regional Economic Development and Investment Unit; and
 - (e) Chief Executive of the Crown Forestry Rental Trust and Te Rūnanga-Ā-Iwi-O-Ngāpuhi.

3. SCOPE OF EVIDENCE

- 3.1 The purpose of my evidence is to:
- (a) provide an overview of the history and national significance of the Treaty Grounds and the wider Estate;
 - (b) describe the legislative and governance arrangements that apply to the Estate;
 - (c) describe the range of activities Waitangi Limited undertakes at the Estate;

- (d) provide an overview of Waitangi Limited and the Trust Board's priorities and strategic planning for the Estate; and
- (e) describe why the proposed Waitangi Estate Special Purpose Zone is required for the Estate.

4. EXECUTIVE SUMMARY

- 4.1 The Estate is a unique 506ha area of land at Waitangi. It includes the Treaty Grounds, which is New Zealand's pre-eminent heritage place and a key cultural, social and tourist destination. It also includes a much wider area that hosts a varied range of land-uses and activities.
- 4.2 Waitangi Limited manages the Estate on behalf of the Trust Board, and in line with our governing legislation, the Waitangi National Trust Board Act 1932 (**Trust Board Act**). We are a significant local employer, carrying out a wide range of activities across the Estate to ensure it remains a place of national significance that all New Zealanders can be proud of.
- 4.3 We have worked with Ms Rochelle Jacobs, expert consultant planner, Mr Simon Cocker, expert landscape architect, and Ms Ngahuia Harawira, expert in cultural matters, to respond to the Proposed Plan. On the recommendation of Ms Jacobs, Waitangi Limited is seeking that the Hearing Panel provide a special purpose zoning for the Estate. The Waitangi Estate Special Purpose Zone proposal (included at Appendix K of the report prepared by Ms Jacobs under section 32AA of the Resource Management Act 1991 (**s32AA report**)) was approved by the board of Waitangi Limited in March and by the Trust Board in April 2025.
- 4.4 The Waitangi Estate Special Purpose Zone proposal is considered to be the best option for ensuring:
 - (a) we can continue to carry out the work we need to do, including to plan for upcoming bicentenary events;
 - (b) the nationally significant values of the Treaty Grounds and Estate are appropriately safeguarded, but without needlessly stifling our work and the public use and enjoyment of the Estate; and
 - (c) future activities can be undertaken at the Estate that align with the purpose of the Trust Board Act and future Masterplanning for the Estate.

5. THE TREATY GROUNDS AND THE ESTATE: A SITE OF NATIONAL SIGNIFICANCE

- 5.1 For ease of reference, I restate the section from my hearing four evidence that describes the significance of the Estate below.
- 5.2 The Estate comprises 506 hectares, lying between the lower tidal reaches of the Waitangi River and the coastline running north to Wairoa Bay. The Treaty Grounds form part of the Estate, occupying 4.8 hectares on the eastern end of the Estate.
- 5.3 The Treaty Grounds are of national significance and considered to be New Zealand's pre-eminent historic site. It was the first place to be inscribed as National Historical Landmark by Heritage New Zealand Pouhere Taonga, their highest level of recognition of heritage significance. It was on the Treaty Grounds that Te Tiriti o Waitangi / the Treaty of Waitangi (**Te Tiriti**) was first signed between Māori and the British Crown on 6 February 1840.
- 5.4 The Treaty Grounds are also the location for the annual national commemorations of Waitangi Day and the signing of Te Tiriti o Waitangi. The week-long calendar of events held each February, culminating in Waitangi Day, represents the single largest and most significant gathering of national figures in New Zealand, including the Governor General, the Prime Minister, Ministers and Members of Parliament, the judiciary, business and community leaders and tangata whenua, as well as the public.
- 5.5 Attendance at Waitangi week events has been increasing each year since 2021, and in 2025 we hosted 60,000 visitors at the Treaty Grounds on Waitangi Day.
- 5.6 **Appendix 1** to my evidence is an overview map of the Estate showing current land uses,¹ including highlighting the Treaty Grounds.
- 5.7 The Treaty Grounds historic precinct was submitted for inclusion on the UNESCO World Heritage List by the government (the Department of Conservation) in 2007.² The Treaty Grounds include several key nationally significant heritage features. These include:³

¹ As of 2021.

² Waitangi Treaty Grounds historic precinct - UNESCO World Heritage Centre.

³ The text here is taken in part from: [Waitangi Treaty Grounds historic precinct - UNESCO World Heritage Centre](#)

- (a) **The Treaty House:** The original British Residency was erected in 1833-34 for Resident James Busby and his family. It was the scene of meetings to set up an independent Māori government, resulting in the signing of He Whakaputanga (a Declaration of Independence) in 1835. In 1840, the Residency was where Te Tiriti was drafted and the grounds in front of the house were the scene of discussions leading to the signing of Te Tiriti. Most of the Residency was pre-cut in Sydney of Australian hardwood and shipped to the Bay of Islands. It is New Zealand's earliest pre-cut building. The house underwent various additions and alterations over time, including a major restoration in 1933 and more recent conservation work in 1989-90.
- (b) **Te Whare Runanga:** The carved Whare Runanga was constructed under the direction of Sir Apirana Ngata for the centenary of the signing of Te Tiriti in 1940 by pre-eminent carvers of the time. It is regarded as among the most significant carved whare in the country and represents carvings from most tribal areas around Aotearoa, which is unique.
- (c) **Waitangi flagstaff:** The flagstaff is located on the site of the signing of He Whakaputanga in 1835 (the Declaration of Independence) and Te Tiriti in 1840. It was erected by the Royal New Zealand Navy for the visit of Queen Elizabeth in 1953.
- (d) **Ngātokimatawhaorua:** This is the largest carved waka in the world and was carved under the direction of Princess Te Puea for the 1940 centenary commemorations.
- (e) **John Scott Visitor Centre 1983:** The iconic visitor centre building was designed by prominent Māori architect John Scott and opened by the then Prince Charles and Princess Diana in 1983.

5.8 The Treaty Grounds and many of these central heritage features on the Estate are scheduled historic items in the Operative Far North District Plan, the Proposed Plan, and the Heritage New Zealand Heritage List (Rārangi Kōrero).⁴

⁴ The Treaty House, flagstaff, Te Whare Runanga and Hobson's memorial on the upper Treaty Grounds are scheduled items in the Operative Plan and Proposed Plan (site #100). The Treaty Grounds is a National Historical Landmark site and Category 1 Historic Place listed under the Heritage New Zealand Pouhere Taonga Act 2014 and is referenced as a Site and Area of Significance to Māori in the Proposed Plan (MS09-49 'Te Pitowhenua').

- 5.9 The lands comprising the Estate were purchased as a single farm block in 1932 and gifted to the people of New Zealand by the then Governor-General Lord Bledisloe and his wife, Lady Bledisloe as "*a place of historic interest, recreation, enjoyment, and benefit in perpetuity to the inhabitants of New Zealand*".⁵
- 5.10 Additional land adjoining the Estate was set aside by Lord and Lady Bledisloe around the same time to be used for forestry (and other activities) with a view to providing a financial endowment to the Waitangi National Trust for the upkeep of the Estate (as well as to provide a 'scenic background' to it). The Waitangi Endowment Forest has been managed by the Department of Conservation since the 1980s, and for this reason, it is outside the scope of our submission.
- 5.11 The Treaty Grounds and surrounding Estate are administered by the Trust Board and Waitangi Limited as a taonga and a place of belonging, a Tūrangawaewae, for all New Zealanders.

6. THE TRUST BOARD AND ITS GOVERNING LEGISLATION

- 6.1 The unique significance of the Treaty Grounds and the Estate is reflected in its specific legislative and governance arrangements.
- 6.2 The Estate and Treaty Grounds are governed primarily by the Trust Board Act, which facilitated the vesting of the Estate and established the Trust Board to administer the Estate. The Trust Board Act also:
- (a) sets out specific offences in respect of the Estate (covering various potentially damaging activities that have not been authorised by the Trust Board); and
 - (b) provides for the Trust Board to make bylaws in respect of the management of the Estate.
- 6.3 As prescribed in the Trust Board Act, the Trust Board is made up of descendants of key people involved with the signing of Te Tiriti at Waitangi in 1840, as well as representatives of the government and of all geographical regions of New Zealand. Trustees are appointed for an initial three-year term and can serve a maximum of three consecutive terms.

⁵ Trust Board Act, preamble.

7. PURPOSE AND OBJECTIVES OF THE TRUST BOARD

7.1 The Trust Board's core objectives include:

- (a) maintaining and enhancing the Estate and its taonga (treasures);
- (b) preserving, protecting, and presenting taonga in its care through operating two state of the art museums (Te Kōngahu Museum of Waitangi and Te Rau Aroha Museum, which are considered to be two of the best in Northland);
- (c) promoting the understanding of the Te Tiriti, its significance, and its ongoing relevance to the district and the country;
- (d) running high quality visitor experiences (including conference facilities); and
- (e) offering education experiences for tamariki in Taitokerau and around the country.

8. OPERATION OF THE TRUST BOARD

8.1 The Trust Board operates under the framework established by the Trust Board Act and a Trust Deed which is set out at schedule 1 of the Trust Board Act.

8.2 The Trust Board Act established the Trust Board as a body corporate and defines its legal powers and responsibilities. It provides the legislative basis for the Trust Board to administer the Estate.

8.3 The **Waitangi National Trust Deed**, set out at schedule 1 of the Trust Board Act, specifies the Estate's national significance, outlines the specific terms under which the Trust Board must manage the Estate, including the objectives for the use and preservation of the land. Together, the Trust Board Act and the Trust Deed empower the Trust Board to:

- (a) hold and manage the Estate on behalf of the citizens of New Zealand;
- (b) preserve the historical and cultural heritage of the site;
- (c) promote public access and understanding of Te Tiriti; and

- (d) develop and maintain facilities and infrastructure appropriate to the site's significance.

8.4 The Trust Board, which governs the Waitangi National Trust, operates in accordance with these documents, ensuring that its activities align with the long-term preservation and promotion of Waitangi's significance.

9. TRUST BOARD'S 20-YEAR STATEMENT OF STRATEGIC INTENT

9.1 The Trust Board has a long-term vision for the future of the Treaty Grounds, articulated in its 20-year statement of strategic intent. This strategic intent provides a roadmap for the Trust Board's activities and decision-making, ensuring that its work remains focused on its core objectives over the long term.

9.2 The core mission for the Trust Board is **He Whenua Rangatira** – to create an enduring symbol of nationhood. Its mission statement is *Titiro ki ngā taumata o te Moana*. It seeks to illustrate the ongoing promise of Waitangi to the world. The following goals are included in the 20-year strategic plan:

- (i) ensuring the ongoing preservation and enhancement of the Treaty Grounds as a place of national significance;
- (ii) developing and delivering engaging and educational experiences for visitors;
- (iii) strengthening the Trust Board's relationships with Māori and other stakeholders;
- (iv) promoting Te Tiriti as a living document with ongoing relevance to contemporary New Zealand; and
- (v) ensuring the financial sustainability of the Trust to support its long-term goals.

9.3 The 20-year strategic intent reflects the Trust Board's commitment to its role as a guardian of this important site and its dedication to promoting a deeper understanding of Te Tiriti for generations to come.

10. WAITANGI LIMITED

10.1 As the range of activities on the Estate increased, in 2016, the Trust Board established Waitangi Limited as a wholly owned subsidiary company with a

board of directors to manage the day-to-day operations of the Treaty Grounds and the wider Estate on its behalf. Both the Trust Board and Waitangi Limited are registered charities.

- 10.2 Waitangi Limited oversees all business operations on the Estate and the Treaty Grounds, including employing the chief executive and staff. Waitangi Limited maintains and operates all activities on the Treaty Grounds and the Estate on behalf of the Trust Board. Waitangi Limited currently employs 82 full time equivalent staff and this number increases in summer to approximately 120 staff, including contract staff. We are a major employer in the area and are focused on developing staff.
- 10.3 Waitangi Limited also has responsibility for maintaining key relationships with councils and mana whenua (noting that key representatives of mana whenua and northern iwi/hapū maintain representation on both Waitangi Limited and the Trust Board), and key tenants on the Estate. Waitangi Limited is the lead entity responding to the Proposed Plan in respect of the Estate.

11. THE WAITANGI ESTATE TODAY

- 11.1 For ease of reference, I restate the section from my hearing four evidence below that describes the various activities that are currently undertaken at the Estate.
- 11.2 As can be seen by reference to the map in **Appendix 1**, today the Estate hosts a wide variety of activities.
- 11.3 Waitangi Limited undertakes a wide range of operations on the Treaty Grounds to maintain the quality of the Treaty Grounds and enhance visitor experience. The scale and breadth of its responsibilities are akin to operating a small council at times, particularly during summer and Waitangi week.
- 11.4 I want to highlight that in addition to Waitangi Day commemorations, the Treaty Grounds is the number one visitor attraction in Taitokerau, with approximately 115,000 domestic and international admissions in the past year. It acts as the central hub for visitors to the Bay of Islands and wider Northland.
- 11.5 Our staff work to protect, maintain, and make accessible the nationally important heritage places and assets. Other areas of operational activity on

the Treaty Grounds include opening and running two state-of-the-art museums: Te Kōngahu The Museum of Waitangi, and Te Rau Aroha: The Museum of the Price of Citizenship. Both museums have been constructed in the last 10 years and have won national awards.

- 11.6 We operate year-round education visits and cultural experiences for schools out of our education centre. More than 5000 school children have participated in our education visits over the past 12 months. We also operate significant hospitality, café, and conferencing facilities all year around, and hangi concert events in the summer.
- 11.7 Beyond the Treaty Grounds, the activities on the wider Estate include:
- (a) The Copthorne Hotel operates on the Estate and provides the largest hotel visitor accommodation and conference facilities in Northland.
 - (b) Since the 1950s the Bay of Islands Golf Club has operated first a nine hole then later an 18-hole championship course. It has 2-300 permanent members and is played by many visiting players each year. It is one of the most picturesque courses in the country and is a drawcard to the Far North alongside other key courses.
 - (c) The Bay of Islands Yacht Club operate a club house, slipway, boat storage and other club facilities for the Estate for the benefit of the wider Bay of Islands community. This includes a significant youth and schools programmes teaching children to sail.
 - (d) Cruise ship and visitor wharf: Separate to the Yacht Club, the Estate houses one of the principal wharfs for the Bay of Islands which is an entry point for all cruise ship visitors. Waitangi Limited maintains all the roads, footpaths and mowing for the cruise ship access, with support from Far North Holdings.
 - (e) Waitangi Boat ramp: The Trust Board operates the single most popular boat ramp for recreational boating in the Bay of Islands. The land for the ramp is leased to Far North Holdings for \$1 per annum. All roading and car-parking is provided and maintained by Waitangi Limited free of charge for users. Recently the Far North District Council contributed to the installation of a new public toilet near the boat ramp located on the Trust Land. The land is provided to the community for a rent of \$0.10 per annum. The Trust Board also

provides land for the local community waka ama club to operate from. This was the site for the long-distance waka ama nationals held in 2023, which again brought a significant number of visitors to the Bay of Islands.

- (f) Sports fields: There are two large areas the Trust Board makes available for wider community use for sporting and other events. These are:
 - (i) the Bledisloe Domain Sports fields: Bledisloe Domain is currently used as the base for the Paihia Football Club and the Paihia Rigby Club. These club grounds and club rooms are situated on Estate near Haruru Falls. The Trust Board has leased these lands to Far North District Council for sporting purposes for \$100 per annum for the past 25 years. The lease is due to expire in 2026.
 - (ii) Sports and event fields near the Treaty Grounds: The sports and event fields beside the Treaty Grounds are made available for a wide range of community purposes where the Paihia Domain is too small or unsuitable. It hosts significant regional events which again bring large numbers of visitors to the area and region, who might not otherwise come. This includes previous music concerts, sports events, iwi festivals, annual car rallies (Cruzin' the Bays) and, of course, the Waitangi annual stalls and fair with between 100 and 150 stallholders present.
- (g) Pastoral farming: The Trust Board maintains a set of pastoral farm leases with local farmers and leases land to the Bay of Islands Pony Club, which operates classes for children and visitors.
- (h) Defined areas of the Estate have been planted in plantation pine forest since the 1960s. These are pre-1990 forest under the New Zealand Emissions Trading Scheme and are actively managed by Forest Managers, PF Olsen.

11.8 Waitangi Limited staff are involved in undertaking a wide variety of activities in relation to the wider Estate including:

- (a) Maintaining visitor tracks: We maintain upkeep and safety on the extensive track networks that covers the Estate. This includes the

- 9.6 km public walking track between Waitangi and Haruru Falls – one of the most popular walking tracks in Northland and a visitor attraction. We receive no government or council (Far North District Council or Northland Regional Council) funding to maintain this track and the associated visitor areas.
- (b) Environmental protection: We maintain active environment protections on the Treaty Grounds and the Waitangi Estate. We are often collecting and disposing of rubbish and refuse deposited on the Estate.
 - (c) Predator control: We actively monitor and run predator control programmes across the Treaty Grounds and Estate. We have bylaws protecting the environment and seek to always prevent dogs from the grounds.
 - (d) Planting: We have a dedicated grounds team who are involved in planting and restoring wide areas of the Estate and Treaty Grounds.
 - (e) Residential and other buildings: We maintain a series of residential buildings and other built facilities, workshops and archival storage facilities.
 - (f) Mowing: Our grounds team mows and maintains all areas on the Estate, from the main bridge beside the Copthorne Hotel through to Haruru Falls.
 - (g) Roading and carparking: The Trust owns all roads and carparks on the Estate, and we work to maintain all roads and carparks and signage in association with support from the Far North District Council and the NZ Transport Agency.
 - (h) Other utilities and core infrastructure: The Estate owns all land through which water, power, and internet pass to not only service the Estate but also properties beyond. We are currently working with mobile providers to locate a mobile tower on the Estate that would significantly improve mobile reception to the whole of Paihia and Waitangi communities.
 - (i) Security: We maintain active security day and night over the Treaty Grounds and areas of the Estate. This includes gates and fences as well as cameras and an active security presence.

- (j) Signage: We prepare, install and maintain all public signage across the Estate.
- (k) Safe public access: We are required to maintain and ensure safe public access to large areas of Estate 265 days of the year. To maintain such a wide range of activities at scale, we require flexibility and the ability to plan and undertake active operations and repairs at times at pace, as no two days at Waitangi are the same. We are very aware of our role as kaitiaki of this nationally significant place, and its natural heritage and taonga. It is required by the Trust Board Act, the Trust Deed and our vision for the Estate.

12. OUR NATION'S UPCOMING BICENTENARIES IN 2035 AND 2040

- 12.1 The Trust and Waitangi Limited share a current statement of strategic intent, which is to see Waitangi as **He Whenua Rangatira** and to **illustrate the ongoing promise of Waitangi** in all that we do.
- 12.2 These are the core pillars of our current five-year strategic plan.
- 12.3 Waitangi will host two of our nation's founding bicentenary events in the next 15 years. Firstly, in 2035 to commemorate the signing of He Whakaputanga, and in 2040, to commemorate the signing of Te Tiriti. As we saw in 1940 at the centenary of the signing of Te Tiriti, Waitangi was the focal point for national events, including the construction of new monuments and buildings that recognise our nationhood and the history of Te Tiriti. Planning for these bicentenary events has already commenced with Ministers and government agencies, and the level of planning, including for capital works, will continue to gather momentum in the coming years to ensure that Waitangi will be ready to welcome visitors in 10 years' time.
- 12.4 The Waitangi Estate Special Purpose Zone will be key to the success of implementing our Masterplan and, critically, will support the national-scale planning required for the nation's bicentenary events in 2035 and 2040 that will commence within the next 10 years.
- 12.5 We have developed some initial ideas, but the substantive Masterplanning process has yet to commence. We will be looking to create a clear long-term integrated planning blueprint for the Treaty Grounds and Estate, with a strong focus on planning for bicentenaries and the required infrastructure. When this work commences, we will engage with mana whenua and a wide

range of stakeholders, including communities, councils, and other interested groups, to incorporate their aspirations and contributions to this Masterplanning for the long-term future of the Estate.

13. OTHER PRIORITIES – MEETING OUR CURRENT FINANCIAL SUSTAINABILITY CHALLENGES

- 13.1 Within the Trust Board's current annual plan, the primary objective is to achieve a level of financial sustainability.
- 13.2 The Estate is unique as a national place that operates without operational funding from central or local government. It is funded entirely through visitor admission charges and revenue generated from leases on the wider Estate, which presents ongoing financial challenges, as discussed in my earlier presentation to the Hearing's Panel at hearing four.
- 13.3 The Trust relies on self-generated revenue to cover the costs of:
- (a) maintaining and preserving the Treaty Grounds, including its historic buildings, landscapes, and taonga;
 - (b) providing educational programs and visitor services; and
 - (c) developing new exhibitions and facilities to enhance the visitor experience.
- 13.4 This financial model requires the Trust Board to be financially prudent and entrepreneurial, balancing its cultural and historical responsibilities with the need to operate in a financially sustainable manner.
- 13.5 In recent years, and since the COVID-19 pandemic, the Trust's financial sustainability has been impacted by the reduction in international and domestic visitor numbers, the rapidly increasing fixed costs, necessary repairs and maintenance, particularly of high specification buildings and technology, as well as overall economic conditions. The need to generate its own funding places significant pressure on the Trust Board to maximise revenue-generating opportunities across the wider Estate. This must be done while prioritising the integrity and significance of the Treaty Grounds and operating within the scope of the Trust Deed and the Trust Board Act.

14. THE IMPORTANCE OF WAITANGI TO THE VISITOR OFFERINGS AND ECONOMIC BENEFITS TO THE REGION

14.1 The Treaty Grounds is a premier tourist destination, attracting visitors from both New Zealand and overseas. It is the number one visitor destination in Northland, and a major factor influencing people's decision to travel to the Bay of Islands and Northland.

14.2 Waitangi is therefore of direct importance to the regional economy. Waitangi generates direct and indirect employment in the tourism sector and supports local businesses, including accommodation providers, tour operators, and retail establishments. It also enhances the overall appeal of the Bay of Islands as a visitor destination. The economic benefits of tourism associated with Waitangi extend beyond the immediate vicinity and positively impact the wider Northland region.

15. THE PROPOSED WAITANGI ESTATE SPECIAL PURPOSE ZONE

15.1 As I have highlighted above and as further detailed in the evidence of our technical witnesses, we seek your support to establish a special purpose zone over the Estate. Our technical experts have developed a Waitangi Estate Special Purpose Zone proposal (included at Appendix K of the s32AA report). It was recently approved by both the Trust Board and Waitangi Limited.

15.2 The establishment of the Waitangi Estate Special Purpose Zone is our preferred approach, given the nationally significant status and history of the Estate, as recognised in the Trust Board Act, as well as the types of natural and built land landscapes and the wide range of activities that take place on the Estate. I have described above the range of activities and land uses across the Estate, indicating that this is far from a 'standard' rural area.

15.3 We consider that this proposal will best enable us to protect this very special historical and cultural site of significance (for the whole nation and all New Zealanders), as well as the recreational and tourism values, productive uses, coastal, estuarine, and other natural values of the Estate within a regional level planning framework. Importantly, it will enable us to manage the Estate in a more cost-effective way than under the Proposed Plan, and provides for future activities to be undertaken at the Estate that align with the Trust Board Act's purpose.

15.4 The risk is that if we have a fragmented planning approach, we will be limited in being able to maintain the breadth and depth of our operational activity and fulfil the intent of the Trust Board Act and Trust Deed, including the ability to undertake future activities for those purposes. Under the current proposed rules, we would require resource consent to dig a hole on the Estate,⁶ to repair existing footpaths, or undertake even basic repairs or maintenance, tasks which we are required to do daily. Given our entirely self-funded model, the imposition of costly resource consent fees of between \$6-10,000 per consent would impose significant constraints and impacts on the viability of the Treaty Grounds and the Estate.

15.5 The proposed Waitangi Estate Special Purpose Zone will enable us to grow the range of supporting activities and initiatives on the wider Estate. As well as our core heritage recreational purposes, we hope to explore possible revenue generation activities such as future holiday accommodation or staff housing that will ensure the viability of the Treaty Grounds and support the local and regional tourism sector. Obviously, any potential future addition to the Estate would be carefully considered by our Trust Board to ensure it would be fully in keeping with our Trust Deed, our governing legislation and local planning requirements.

16. MOVING FORWARD

16.1 Through our governance arrangements and the existing range of activities being undertaken at the Estate, we are already engaging with mana whenua, the Far North District Council, leaseholders on the Estate, and communities on these issues, and this will increase over the upcoming months and years through the establishment of the Waitangi Estate Special Purpose Zone, future discussions about Masterplanning for Waitangi, and the bicentennial commemorations at Waitangi.

16.2 As we look forward to the future, with our Masterplanning work and the planning for developments and facilities required for the upcoming bicentenaries, it is critical that the planning framework applying to the Estate enables this kind of future integrated development and protection. We have been working to develop the Waitangi Estate Special Purpose Zone for upwards of 18 months, and have dedicated hundreds of thousands of dollars to the process and planning work. It is of central importance to

⁶ As advised by our expert planning consultant, Ms Jacobs: refer to Rule SASM-R1.

ensuring that we can deliver on the future vision of Waitangi in a sustainable manner.

Ben Grant Dalton

30 May 2025

APPENDIX 1 – MAP OF THE ESTATE

