

SECTION 42A

Hearing 15B: Rezoning Submissions

Waitangi Special Purpose Zone

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Appendix 1: Evaluation of Rezoning Submissions Waitangi Estate

Appendix 2: Officer's Recommended Decisions on Submissions (Rezoning Hearing 15B)

Appendix 3: Officer's Recommended Amendments to WEZ Chapter

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Appendix 5: Statement of Evidence of:

1. **Dr Andy Brown, Archaeologist;**
2. **Ms Melean Absolum, Landscape architect; and**
3. **Ms Juliann Chethan, Cultural advisor.**



List of Abbreviations

Table 1: List of Submitters and Abbreviations of Submitters Names

Submitter Number	Abbreviation	Full Name of Submitter
S409	HNZPT	Heritage New Zealand Pouhere Taonga
S502	Northland Planning	Northland Planning and Development 2020 Limited
S503	Waitangi Limited	Waitangi Limited
S185	Doug's Boat Yard	Doug's Boat Yard Opua

Note: This table contains a list of submitters relevant to this topic which are abbreviated and does not include all submitters relevant to this topic. For a summary of all submitters please refer to Section 5.1 of this report (overview of submitters). Appendix 2 to this report also contains a table with all submission points relevant to this topic.

Table 2: Other Abbreviations

Abbreviation	Full Term
FNDC	Far North District Council
NPS	National Policy Statement
PDP	Proposed District Plan
RMA	Resource Management Act 1991
RPS	Regional Policy Statement Regional
WEZ	Waitangi Estate Special Purpose Zone

1 Executive Summary

1. The Far North Proposed District Plan ("PDP") was publicly notified in July 2022. This report provides recommendations on submissions requesting a new special purpose zone for the Waitangi Estate.
2. This Section 42A Report should be read in conjunction with the Rezoning Submissions - Overview Report.
3. The rezoning submissions addressed in this report are summarised as follows:
 - a) Waitangi Limited (S531.008-S531.011) and Northland Planning (S502.108, S502.110-112) (hereafter referred to as 'the Waitangi submitters') seeking the notified Rural Production zone of the Waitangi Estate be replaced with a new Special Purpose zone.
 - b) The Waitangi submitters seeking if the notified Rural Production zone is not to be replaced with a new Special Purpose zone a precinct be added over the Waitangi Treaty grounds.
 - c) Alternatively, if the Waitangi Treaty grounds is not rezoned or precinct added the grounds be rezoned as follows:
 - d) Lots 2 and 3 DP 326610 be rezoned as Sport and Active Recreation (to accommodate the existing golf club); and
 - e) The rules applying to the Waitangi Treaty Ground be clarified for when a resource consent is required.
 - f) Doug's Boat Yard (S185.001) seeking the Waitangi Estate zoning be amended to be maintained as its current zoning of conservation, or rezoned to Natural Open Space and the current conservation zone be extended to include the treaty coastal grounds boundary along the golf course to the north and/or even further along the coastal margin of the golf course to wherever that land adjoins private land.
 - g) HNZPT (S409.049) seeking new heritage areas over the Waitangi estate.
4. This report has been prepared in accordance with Section 42A of the Resource Management Act 1991 ("RMA") and outlines recommendations in response to the issues raised in submissions. Rezoning submissions have been evaluated in this report using criteria consistent with the direction of the Hearing Panel provided in Minute 14: Rezoning Criteria and Process and Section 32AA of the RMA. This report is intended to both assist the Hearings Panel to make decisions on the submissions and further submissions on the PDP and provide submitters with an opportunity to see how their submissions have been evaluated, and to see the recommendations made by officers prior to the Hearing.

5. The key recommendation in this Report is the Waitangi Estate, rezoned to a Special Purpose zone being made up of four sub zones namely:
 - a) Te Pitowhenua (Treaty Grounds) subzone;
 - b) Whakanga (Tourism) subzone;
 - c) Papa Rehia (recreation) subzone; and
 - d) Ahuwheneua (general activities) subzone.¹

2 Introduction

2.1 Author and Qualifications

6. My name is Lynette Morgan, and I am employed as a Policy Planner in the District Plan Team at the Far North District Council ("FNDC").
7. I hold the qualifications of a Post Graduate Diploma of Public Policy from the University of Victoria and a Bachelor of Laws from the University of Otago.
8. I have 8 years' experience in central government policy development, including the development, report writing, drafting and carriage of Local Government and related Legislation through the New Zealand House of Representatives. I have two years of Local Government policy development formation, drafting and writing of bylaws and delegations including planning and resource management, including consultation and the preparation and writing of s42A reports and over 25 years of practice in the Law.
9. I have been involved as the Section 42A report author in earlier hearings on the PDP for the following topics: Temporary Activities, Mineral Activities, Designations and Hazardous Substances.

2.2 Scope/Purpose of Report

10. This report should be read in conjunction with the Rezoning Submissions - Overview Report. The Overview Report provides:
 - a) Overview information on the statutory context within which the rezoning submissions must be considered, (including changes to the relevant regulatory framework), which officers have considered when making recommendations on the submissions received.

¹ A map of the recommended Waitangi special purpose zone and sub zones is attached as Appendix four

- b) An overview of the process that officers have followed when evaluating rezoning submissions, including the criteria and process set out in Hearing Panel Minute 14.
- 11. This Report has been prepared in accordance with Section 42A of the RMA to:
 - a) Assist the Hearings Panel in making their decisions on the submissions and further submissions on the PDP; and
 - b) Provide submitters with an opportunity to see how their submissions have been evaluated and the recommendations being made by officers, prior to the Hearing.
- 12. This Report responds to rezoning submissions for the Waitangi Special Purpose zone.

2.3 Expert Advice

- 13. In preparing this report I rely on expert advice of:
- 14. Dr Andy Brown, Archaeologist. The scope of Dr Brown's evidence relates to the evaluation of submissions and further submissions received from Waitangi Limited and Heritage New Zealand Pouhere Taonga ("HNZPT") and the evidence they provide in response to Minute 14 with respect to archaeological matters.
- 15. Ms Melean Absolum, Landscape Architect. The scope of Ms Absolum's evidence relates to the evaluation of submissions and further submissions received from Waitangi Limited and HNZPT and the evidence they provide in response to Minute 14 with respect to landscape matters, particularly impacts on Outstanding Natural Features (ONF) and Outstanding Natural Landscapes (ONL).
- 16. Ms Juliann Chethan, Cultural Advisor. The scope of Ms Chethan's evidence relates to reviewing the evidence provided by Waitangi being the Section 32AA Report prepared by Ms Rochelle Jacobs, the Cultural Values Assessment prepared by Ngahuia Ramari Harawira and the Section 42A Report prepared by Ms Theresa Burkhart on behalf of FNDC in respect to Sites and Areas of Significance to Māori.
- 17. Dr Brown, Ms Absolum and Ms Chethan's evidence is provided in **Appendix 5** to this Report.

2.4 Code of Conduct

- 18. I confirm that I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023 and that I have complied with it when preparing this report. Other than when I state that I am relying on the advice of another person, this evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express in this report.

19. I am authorised to give this evidence on the Council's behalf to the Proposed District Plan hearings commissioners ("Hearings Panel").

Wherever possible, I have provided a recommendation to assist the Hearings Panel. Procedural Matters

Pre-hearing Engagement with Submitters

20. Table 1 below summarises the pre-hearing informal engagement with submitters and the outcome of these discussions specific to the submissions that are evaluated within this report.

Table 1 Pre-hearing Informal Engagement with Submitters

Submitter	Type of Engagement	Date (s)	Summary of Discussion and Outcomes
Waitangi Limited and HNZPT	Meeting	27 March 2025	Initial meeting to bring submitters together to discuss each submitters position and FNDC initial position on rezone submissions National Planning Standards and Mandatory Direction (particularly the Zone framework standard set out in Standard 8 and specifically 8.3) Waitangi submitters were to draft initial WEZ chapter and Waitangi Limited, HNZPT and FNDC to meet again to discuss the same.
Waitangi Limited and HNZPT	Meeting	28 May 2025	Meeting to discuss initial draft of the WEZ chapter. Focus of this meeting was on the National Planning standards, and the Mandatory Direction and Standard 8 as discussed at the 27 March 2025 meeting and if a WEZ would meet the test as set out in Standard 8. HNZPT confirmed their support in respect of a WEZ.

Waitangi Limited	Meeting/ Workshop	1 July 2025	Discussion on the draft chapter provided by the Waitangi submitters. FNDC and Waitangi engaged in lengthy discussion to achieve consensus where possible on Objectives, Rules and Standards for the WEZ chapter.
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21. These meetings have focused largely on working in a collaborative way to achieve an agreed position. There have been other meetings to discuss tweaks and re writes of the draft WEZ which have enabled the submitters and FNDC to reach the final position as set out in this Section 42A Report.

2.5 Section 32AA Evaluation

22. Ms Jacobs provided a S32AA Report with the Waitangi submitters evidence. This report has been discussed in the report.

3 Consideration of Submissions Received

3.1 Overview of Submissions Received

Table 2 Overview of Submissions relating to Waitangi Estate

Submission point	Submitter	Decision requested
S503.008-011	Waitangi Limited	Replace the notified Rural Production zone with a new special purpose zone for the Waitangi Estate.
S502.108 and 110-112	Northland Planning and Development 2020 Limited ("Northland Planning")	Replace the notified Rural Production zone with a new special purpose zone for the Waitangi Estate.
S409.049	HNZPT	Insert new heritage areas.
S185.001	Doug's Boatyard	Replace the land designated conservation in the ODP as "Natural Open Space" and extended it to the treaty coastal

		grounds boundary along the golf course to the north and/or even further along the coastal margin of the golf course to wherever that land adjoins private land.
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3.2 Officer Recommendations

23. **Appendix 1** provides a table which evaluates the rezoning submissions and provides recommendations to the hearing panel. My summary evaluation and recommendations on submissions are provided in the relevant subsections below.
24. A full list of submissions and further submissions relating to the request for a WEZ are contained in **Appendix 2 – Officer’s Recommended Decisions on Submissions to this report.**
25. As set out in paragraph 57, Ms Jacobs on behalf of the Waitangi submitters and the Reporting officer worked collaborative and a copy of FNDC recommended plan provisions for the WEZ Chapter is provided in **Appendix 3.**
26. My understanding is the Waitangi submitters intend to respond to the further areas where there was no agreement through rebuttal evidence, and I expect that there will be an opportunity to refine the provisions through the hearing process and my subsequent right of reply. Accordingly, the WEZ s attached as Appendix 3 to this report is a “working draft” version with outstanding issues with the intent that these can be addressed through this process.
27. **Appendix 4** is a Map of the Recommended Waitangi Special Purpose zone and sub zones.
28. Additional information can also be obtained from the Summary of Submissions (by Chapter or by Submitter) Submissions database Far North District Council (fndc.govt.nz) the associated Section 32 report on this chapter [section-32-overview.pdf](#) (fndc.govt.nz) the overlays and maps on the ePlan Map - Far North Proposed District Plan (isoplan.co.nz).

3.2.1 Waitangi Special Purpose Zone (WEZ)

Overview

Submission Point	Notified PDP Zoning	Officer Recommendation(s)
Waitangi Limited (S531.008 - S531.011)	Rural Production Zone	Amend zoning of land contained within the Waitangi Estate to a new WEZ.

Submission Point	Notified PDP Zoning	Officer Recommendation(s)
Northland Planning and Development 2020 Limited (S502.108, S502.110-112)		
HNZPT (S409.049) and (FS51.34)	Rural Production zone	Amend zoning of land contained within the Waitangi Estate to a new WEZ.
Doug's boatyard Opua (S185.001)	Rural Production Zone	Amend zoning of land contained within the Waitangi Estate Limited to a new WEZ.

3.3 Matters Raised in Submissions and Evidence

Summary of Original Submissions

29. The Waitangi submitters request that the land contained within the Waitangi Estate be rezoned from Rural Production to a new special purpose zone specifically drafted for the Waitangi Estate. The Waitangi submitters argue that the number of overlays that apply to the Waitangi Estate, together with the provisions of the underlying Rural Production zone and other district-wide chapters, make it difficult to continue to operate and further develop the Waitangi Estate.
30. The Waitangi submitters are of the view that the existing Rural Production zone may directly conflict with the Waitangi Trust Board Act's preamble which has set aside the site for a specific purpose.
31. The multiple layers of controls, in the view of the Waitangi submitters, make any planning assessment difficult as, in all cases, the most stringent rules in any overlay or district wide chapter apply. This means that almost all activities on the Waitangi Estate will require resource consent as a Discretionary or Non-Complying activity. The Waitangi submitters request both the use of a special purpose zone and amendments to various district wide chapters on the basis that this combination of amendments is more suitable to managing this unique site.
32. HNZPT (S406.049) and HNZPT (FS51.34) sought an additional Heritage area for the Waitangi Estate. This is fully set out in paragraphs 53-55 of Ms Pearson's S42A Heritage Area Overlay and Historic Heritage chapters report.
33. Doug's Boatyard (S185.001), Mr Schmuck submitted he was opposed to any change of the Waitangi Trust land from its primary purpose of public access to and along the Coastal Marine Arae (CMA) in conjunction with its historical purpose. Mr Schmuck sought the land be designated as 'Natural Open Spaces' and /or even be extended to the treaty coastal grounds

boundary along the golf course to the north and/or even further along the coastal margin of the golf course to wherever that land adjoins private land.

Summary of Evidence received

34. The Waitangi submitters opted into the evidence exchange timetable, as set out in Minute 14 issued by the Hearing Panel. They submitted the following evidence in support of the WEZ (and consequential amendments to district wide chapters):
35. Landscape evidence by Mr Simon Cocker. Mr Cocker sets out a summary of his evidence at paragraph 5.1 of his evidence. Mr Cocker evidence provides a summary of the 8 character areas of the Waitangi Estate and the landscape values based on commonality of topography, vegetation and land use these are: the Bay coastal area; Treaty grounds character area; Coastal built character area ridge (recreation) Character area; Ridge (Pastoral) character area; Estuarine coastal character area; Southern pastoral character area; and the Haruru Falls residential character area.
36. Mr Cocker evidence set out how he assessed the landscape values of the proposed WEZ and the visual exposure of the character areas. He determined each of the character areas and mapped them as either high, medium or low sensitivity in terms of their landscape sensitivity. He depicted his findings in Figure 3 of his report. In figure 5 of his report he provides a table which summarises the values of each character area.
37. Mr Cocker has created an assessment criterion for the four sub zones which he sets out in table 5.
38. Mr Cocker submits the WEZ provisions are appropriate in respect of landscape as they:
39. Have been tailored to specific areas throughout the site to take into account and protect landscape and natural character values, while at the same time considering and providing for a practical management approach for appropriate recreational, tourism, and productive uses, and;
40. Designed to accommodate the spatial variations in landscape values and sensitivities across the site, rather than requiring the majority of the Waitangi Estate to be subject to a uniform level of control. This enables a greater degree of 'protection' to be applied to more sensitive areas (including those sensitive areas not subject to additional controls as Outstanding Natural Landscapes, Outstanding Natural Features, High Natural Character Area or Coastal Environment under the PDP), while a more permissive approach can be applied to provide for areas with lower sensitivities.
41. The WEZ gives appropriate recognition to the unique character and sensitivity of the nationally historic Treaty Grounds and its contextual

landscape, being a landscape that is imbued with cultural sensitivity, as well as being a significant tourism attraction.

42. The WEZ into account the unique mix of historic, cultural, recreational and tourism activities associated with the Estate, including diverse land uses, and consequent pressures on the landscape character.
43. A cultural values assessment by Ms Ngahuia Ramari Harawira. A summary of the cultural values assessment is set out in paragraph 5.1 of the evidence. The evidence makes the following statements:
44. the PDP in its current form will significantly limit the Waitangi Estate's capacity for future development, which will adversely impact its relationship with the Haukāinga.²
45. the PDP is generic leaving no room to build a comprehensive management approach for the Waitangi Estate. The PDP (a) offers little policy support for any future land use developments that Waitangi or the Trust Board may wish to pursue separately or in partnership with Haukāinga; (b) will limit the relationship between the Haukāinga, Waitangi and the Trust Board; (c) fails to recognise the local, regional, national and international importance of the Waitangi Estate, which operates as a national marae and a physical meeting point for Māori and the Crown; and (d) overlooks the need to have a unique and comprehensive management approach for the Waitangi Estate that is tailored to its rich and diverse history.³
46. Ms Harawira also stated:
47. a WEZ would enable a more integrated and comprehensive management approach recognising and supporting the Waitangi Estates legacy and heritage including cultural heritage protection, natural and environment and cultural protection, areas of significance to Māori, protection of waterways and community and visitor engagement, including meaningful access to the Haukāinga and Manuhiri.⁴
48. Ms Harawira view was the "four subzones as proposed offer an opportunity to balance the preservation of the historic character, natural features and landscape values, and cultural values of the area against future land use activities that are sensitive to these attributes; allowing for a comprehensive and culturally appropriate management approach that balances cultural, environmental, and economic development and supports existing cultural initiatives at the Waitangi Estate", including recognising the Waitangi Estates' commitment to Te Tiriti.⁵
49. The Waitangi submitters also submitted evidence from the following:

² Statement of evidence of Ngahuia Ramari Harawira 30 May 2025 - Paragraph 8.2

³ Ibid paragraph 8.3

⁴ Ibid paragraph 9.2

⁵ Ibid paragraph 9.3 and 9.4

50. Mr Ben Grant Dalton, Chief Executive of Waitangi Limited which supported the evidence of the others in terms of a WEZ. This was supporting evidence and outlined the position on behalf of Waitangi Limited (which is the operating company of the Waitangi National Trust Board). Mr Dalton's evidence provided an overview of the history and significance of the Waitangi Estate, the legislation applicable to the Waitangi Estate, governance arrangements, and activities in respect of the Estate and why Waitangi Limited support the WEZ in respect of the Estate.
51. Ms Rochelle Ashley Jacobs, Senior Planner Northland Planning & Development 2020 Limited submitted planning evidence. Ms Jacobs evidence included:
52. An overview of Estate and the proposed plan provisions in respect of the Estate;
53. Ms Jacob's planning opinion as to why a special purpose zone should be considered; and
54. An accompanying S32AA Report;
55. Some of the key points of Ms Jacob's planning evidence in support of a WEZ to manage the Estate are:
56. The Estates governing body are of the view the PDP does not appropriately reflect the national historic significant and its unique characteristics and that they are misaligned with the legislative scheme under the Trust Board Act that underpins the way the Estate is managed and developed;⁶
57. The eleven zones and overlay under the PDP are complicated and confusing; and ⁷
58. The PDP would zone the majority of the estate as RPZ which does not align with the purpose or the way the Estate is managed nor assist with the continued protection of nationally significant historic heritage on the Treaty Grounds, or provide for the recreation, enjoyment and benefit of the Estate for all New Zealanders.⁸
59. HNZPT provided a statement of evidence from Mr Stuart Bracey as a further submitter to the Waitangi submitters, stating:
60. the range of zones and overlays in the PDP does not provide for one cohesive management tool which may result in the risk of mixed outcomes and poor decision making;

⁶ Evidence paragraph Ms Rochelle Ashely Jacobs dated 31 May 2025 paragraph 6.7

⁷ Ibid 6.8

⁸ Ibid parargpgh 6.9

61. the many significant national events held at the Treaty grounds are not provided for in an appropriate way causing confusion; and
62. the economic function the wider Waitangi Estate plays in maintaining and promoting the Waitangi heritage and cultural sites in not appropriate provided for in the PDP provisos.⁹
63. HNZPT now supports a WEZ following informal pre-hearing discussions. Mr Bracey confirms a WEZ will enable HNZPT to work together with the Waitangi submitters and FDNC to manage the Waitangi site in a co-ordinated way to better achieve the key outcomes for all parties.
64. Mr Bracey stated he was satisfied the WEZ provided for the ongoing protection and maintenance of the listed features of direct interest to HNZPT. He pointed to Objective WEZ-01 and Policies WE-P2, P4 and P7 in support of this view.

Analysis

Introduction

65. Following the summary of submissions, FNDC, Waitangi submitters and HNZPT have worked positively and collaborative to discuss the best approach for the Waitangi Estate. Discussions included all options and approaches that were available to the Waitangi submitters and the FNDC, and associated provisions that were the most appropriate for managing the unique and nationally significant site that is the Waitangi Estate. I agree in principle with the Waitangi submitters that a special purpose zone, combined with targeted amendments to district wide chapters, is the most appropriate planning response to both protect the historic, natural and cultural values of the Waitangi Estate, but also direct and enable an appropriate level of development, particularly in areas outside of the Te Pitowhenua sub-zone where there are more opportunities for compatible commercial, recreation and tourism related activities.

The Waitangi Estate Special Purpose Zone provisions and consequential changes to district wide chapters

66. The Waitangi submitters prepared a document containing proposed provisions for the WEZ, as well as a range of consequential amendments to other district wide chapters necessary to reference the WEZ and/or provide specific exemptions for activities within the WEZ (refer to Appendix K of the Section 32 report for the WEZ prepared by Ms Jacobs).¹⁰

⁹ Statement Stuart Bracey 13 June 2025 paragraph

¹⁰ https://www.fndc.govt.nz/__data/assets/pdf_file/0010/41131/Section-32AA-Evaluation-Report-Proposed-Waitangi-Estate-Special-Purpose-Zone.pdf

67. Since these provisions were submitted as evidence for the Waitangi submitters, I have worked collaboratively with Ms Jacobs , HNZPT and other reporting officers on other affected PDP topics to refine and improve the provisions so that they achieve clear and directive outcomes for the Waitangi Estate, as well as alignment with the recommendations of reporting officers on other parts of the PDP. I have included a revised version of Ms Jacob's Appendix K as **Appendix 3** to this report, which outlines the wording that has been agreed between Ms Jacobs and myself, as well as areas where there is still disagreement on provision wording. The key differences between the Appendix K submitted in evidence and **Appendix 3** to this report are as follows:
68. Refinement of the overview wording to remove repetition and provide a clearer description of the purpose of the WEZ.
69. Refinements to the objectives to use more consistent language, particularly when referring to historic, natural and cultural values of the Waitangi Estate.
70. A revised set of policies that provide clearer direction on how to achieve specific outcomes for the various sub-zones, as well as the removal of policy wording relating to activities being appropriate if they provide an economic benefit to the Waitangi Estate.
71. Restructuring of WEZ-R1 and WEZ-S1 relating to buildings and structures to more closely follow the structure of other zone chapters (using the Rural Production zone as a base) and to ensure there are clear standards relating to maximum height, height to boundary, setbacks and coverage.
72. The introduction of a new definition for 'Waitangi Commercial Activities' and amendments to WEZ-R4 for commercial activities to provide narrower and clearer parameters around what types of commercial activities are appropriate across the Waitangi Estate.
73. Minor refinements to the rules managing visitor accommodation and educational facilities to better reflect the scale and nature of these activities that is appropriate on the Waitangi Estate.
74. The introduction of several non-complying activities to be more consistent with the Rural Production zone chapter (and other zone chapters).
75. Further amendments to the recommended changes to the district wide chapters on Renewable Energy, Historic Heritage, Natural Features and Landscapes, Coastal Environment, Light, Noise, Signs and Temporary Activities (compared to Appendix K) to better reflect the recommendations made by reporting officers to those chapters during the hearings process and/or achieve consistency with what those chapters are trying to achieve.

Areas where there is agreement with evidence submitted

76. Ms Melean Absolum reviewed the evidence as provided in respect of Landscape by the Waitangi submitters. As set out in her evidence she supports a WEZ and the creation of four sub-zones, similar to those in the PDP for Kauri Cliffs Special Purpose Zone, where more stringent controls are applied to more sensitive areas of. She notes the "four sub-zones of the WEZ are based on landscape assessment work carried out by Mr Cocker in which different character areas and their sensitivities were identified." Ms Absolum gives evidence that "although the character areas and sensitivity ratings are not exactly the same as the proposed sub-zone areas, in her opinion the small differences arise from a simplification of areas and are not material to the protection of landscape and natural character values."¹¹
77. Ms Absolum's evidence noted there was perhaps an error in the NFL. However, chapter in respect of NFL-R1 noting the word minimum was used instead of maximum.¹² This was corrected during the informal pre-hearing engagement phase. Ms Absolum also recommended re-wording WEZ -R1 to remove the plan user to the reference to *Figure 7, Landscape Sensitivity of the Waitangi Estate Special Purpose zone Assessment of Landscape Effects report prepared by Simon Cocker Landscape Architect*'. During the informal pre-hearing engagement phase WEZ-R1 was amended to reflect the purpose of the Rule is to manage the impact of the built development on a particular landscape, with potentially incorporating elements from the landscape assessment into the mix. Having the plan user referring to a *Landscape Sensitivity of the Waitangi Estate Special Purpose zone Assessment of Landscape Effects report prepared by Simon Cocker Landscape Architect does not address that effect*.
78. No archaeology evidence was submitted by the Waitangi submitters. However, as noted by Dr Andy Brown in his report prepared for the FNDC on 23 June 2025 he states despite considerable survey effort, there remains the potential for unrecorded sites to be present as is evidenced by the relatively recent (2024) recording of a Māori horticultural complex on the open ground northwest of the Copthorne Hotel.¹³
79. Ms Juliann Chethan, Cultural advisor, confirms the Waitangi submitters "CVA and associated cultural evidence accurately captures the tone of the Hāukainga response to WL's SPZ proposal."¹⁴
80. As set out in paragraph 71 below as result of the collaborative approach there is now high degree of alignment in respect of the provisions in respect of the WEZ chapter, the areas of disagreement are set out further in 88 onwards. However, I do not agree completely with Ms Jacob's

¹¹ Landscape evidence Melean Absolum 17 June 2025

¹² Ms Jaconbs evidence page 35 paragraph 12 (g)

¹³ Dr Andy Brown's Review dated 23 June 2025

¹⁴ Technical memorandum Julaine Chetham - Chetham Consulting Paragraph 3 page 5

planning evidence and those areas relate specifically to the rationale for a WEZ, this is discussed further in the paragraphs below.

Areas where there is disagreement with evidence submitted

81. There is a high degree of alignment between me and Ms Jacobs on the WEZ provisions due to the collaborative drafting approach taken through the pre-hearing process on this topic. However, there are still areas of disagreement. Some of these areas relate to analysis provided in the Section 32AA assessment and/or evidence, while others relate to specific provisions as follows:
82. One of the rationales for seeking a WEZ is the Waitangi submitters are concerned at the high number of protections across the entirety of the Waitangi Estate site result in even the most basic activities on the Estate will require resource consents under the PDP. The relevant test for a special purpose zone is discussed below and is set out in the National Planning Standards. While it is acknowledged applying for a Resource Consent can be restrictive and complex, this is not one of the tests set out in the National Planning Standards.

Consideration of special purpose zone tests under the National Planning Standards

83. Ms Jacobs outlines the relevant tests for a special purpose zone under the National Planning Standards in Section 10 of her evidence. While I agree with her analysis for tests (a) and (b) of Mandatory Direction 8.3 (being whether the Waitangi Estate is significant to the district, region or country and whether it is impractical for the Estate to be managed through another zone), I consider that her analysis of test (c) requires further consideration of options.
84. Test (c) focuses on whether it is impractical for the Waitangi Estate to be managed through a combination of spatial layers. In paragraphs 10.11-10.13 of Ms Jacob's evidence, she focuses on how the proposed range of overlays in the PDP (e.g. Coastal environment, Outstanding Natural Features and Landscapes and Natural character spatial layers, plus scheduled Heritage Resources and Sites and Areas of Significance to Māori as well as the potential for a historic heritage overlay) could manage aspects of the Waitangi Estate relating to building scale, earthworks and vegetation clearance. Ms Jacobs concludes that the use of these overlays would not provide for the desired range of land uses and activities at the Estate. I also note that, indirectly, Ms Jacobs also considers the possibility of using a precinct as a spatial layer as Option 3 of her options assessment in the Section 32AA report, but no other types of spatial layers have been considered. I agree with Ms Jacob's reasoning in paragraphs 9.11 - 9.14 as to why a precinct is not a practical spatial layer for the Waitangi Estate.

85. As per the direction from the Hearing Panel at Hearing 9 – Rural topic, the Hearing Panel were clear that they are interested in the use of both precincts and development areas as alternative spatial layers for special purpose zones. It is my understanding that, for a special purpose zone to pass test (c), it needs to be demonstrated that the range of spatial layers available under the National Planning Standards are not suitable alternatives, which include (in addition to overlays, precincts and development areas), specific control layers, designations and heritage orders (as per Table 18 of the National Planning Standards).
86. In my view, the other spatial layers not covered by Ms Jacob’s assessment are impractical for the Waitangi Estate for the following reasons:
87. *Development area* – as per the National Planning Standards description of where a development area would be used, this layer is suitable for use in situations where plans such as concept plans, structure plans, outline development plans, master plans or growth area plans apply to determine future land use or development. The National Planning Standards also specify that when the associated development is complete, the development areas spatial layer is generally removed from the district plan, either through a trigger in the development area provisions or at a later plan change. In the case of the Waitangi Estate, there is no specific plan for future growth or development, rather the WEZ and associated sub-zones provide a more comprehensive framework for directing particular outcomes across various parts of the Waitangi Estate through land use and subdivision rules and standards, rather than through a development type plan or map. Further, the WEZ framework provides a long-term management approach for the Waitangi Estate going forward. There is no point in the future where this framework will have been ‘achieved’ or deemed ‘complete’ to a point where it could be removed from the district plan. As such, a development area is not a practical tool that could be used in place of a special purpose zone.
88. Specific controls – as per the National Planning Standards description (and examples) of where a specific control layer would be applied, this layer is suitable for situations where one (or perhaps two) matters require a different approach from that provided by the zone provisions, district wide chapters and/or other spatial layers. As there are a wide range of matters that require a bespoke approach for the Waitangi Estate (as evidenced by the number of different rules and standards that have been drafted for the WEZ in Appendix 3), a specific control layer is not a practical tool that could be used in place of a special purpose zone.
89. Designation – impractical as the Waitangi Limited is not a requiring authority.
90. Heritage order – impractical as a heritage order would only manage the heritage values of the Waitangi Estate and would fail to provide sufficient

direction (either in terms of controls or spatial location) on the range of activities that occur, or could occur, on the Waitangi Estate.

91. Overall, Ms Jacobs and I come to the same conclusion with respect to test (c) of the National Planning Standards for special purpose zones – that none of the spatial layers available as tools under the National Planning Standards are practical for use in the case of the Waitangi Estate and, as such, the WEZ passes the tests for a special purpose zone.
92. *Consideration of the relevant tests under the National Policy Statement for Highly Productive Land (NPS-HPL)*
93. Ms Jacobs’s evidence does not mention the relevant tests for rezoning land under the NPS-Highly Productive Land (“NPS-HPL”), other than to mention in paragraph 7.9 that the Waitangi Estate contains eight different soil classifications and that three areas are considered to contain highly productive land, as defined by the NPS-HPL. These areas are shown in Appendix D of the Section 32AA report in the material prepared by AgFirst.
94. The Section 32AA report prepared by Ms Jacobs does include an assessment against the NPS-HPL in paragraphs 8.32 - 8.44. I have discussed Ms Jacob’s analysis with Ms Melissa Pearson as the reporting officer for the Rural topics and Ms Pearson disagrees with several aspects of Ms Jacobs’ analysis as follows:
95. In paragraph 8.41 of the Section 32AA report, Ms Jacobs argues that the definition of ‘urban zone’ in the NPS-HPL does not apply as the proposed WEZ (although being a special purpose zone) does not have an urban character and is more akin to a Māori Purpose zone (which would be exempt from being considered a special purpose zone under the NPS-HPL). Ms Pearson disagrees as, in her view, unless the proposal is for a Māori Purpose zone, any other type of special purpose zone clearly falls within the NPS-HPL definition of ‘urban’ as a description of a zone. The NPS-HPL does not allow for a consideration of ‘best fit’ with respect to whether a zone is more urban or rural in character or whether it provides for some sort of cultural use – if it is not Rural Production, General Rural, Rural Lifestyle or Māori Purpose, then it is urban under Clause 1.3 - Interpretation of the NPS-HPL.
96. In paragraph 8.42 of the Section 32AA report, Ms Jacobs considers that the exception under clause 3.9(2)(c) of the NPS-HPL (i.e. that the use and development of highly productive land is not inappropriate) is likely to apply to those parts of the Waitangi Estate that are mapped as Class 3 land as the Waitangi Estate is held and managed for, or is for a purpose associated with, a matter of national importance under Section 6(e) and (f) of the RMA. Ms Pearson disagrees as clause 3.9 of the NPS-HPL is not a clause that is relevant to an application for rezoning. Rather, clause 3.9

is only relevant when a territorial authority is considering whether the use or development of highly productive land is inappropriate, i.e. in a situation where a land use resource consent is being applied for. In Ms Pearson's view, the NPS-HPL is clear that the relevant tests for rezoning are set out in either clause 3.6 (when an urban zone is proposed) or clause 3.7 (when a rural lifestyle zone is proposed).

97. Based on the above, Ms Jacobs concludes that the Waitangi Estate is 'not subject to' the NPS-HPL in paragraph 8.44 of the Section 32AA report. Ms Pearson disagrees based on her analysis and considers that, as the WEZ is captured by the NPS-HPL definition of an urban zone, the rezoning proposal is subject to the rezoning tests for an urban zone under clause 3.6 of the NPS-HPL.
98. I prefer Ms Pearson's position on whether the NPS-HPL applies and agree with her that the relevant tests to be considered when evaluating the WEZ are contained in clause 3.6(4) and (5) of the NPS-HPL as they apply to Tier 3 councils. These tests are:

- (4) Territorial authorities that are not Tier 1 or 2 may allow urban rezoning of highly productive land only if:
 - (a) the urban zoning is required to provide sufficient development capacity to meet expected demand for housing or business land in the district; and
 - (b) there are no other reasonably practicable and feasible options for providing the required development capacity; and
 - (c) the environmental, social, cultural and economic benefits of rezoning outweigh the environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production, taking into account both tangible and intangible values.
- (5) Territorial authorities must take measures to ensure that the spatial extent of any urban zone covering highly productive land is the minimum necessary to provide the required development capacity while achieving a well-functioning urban environment.

99. While I appreciate that these tests were clearly not drafted with a situation like the Waitangi Estate in mind (and that the NPS-HPL definition of urban zones did not contemplate special purpose zones as unique as Waitangi), Ms Pearson and I consider that these are the correct tests of the NPS-HPL to apply.
100. With respect to the development capacity tests in (4a) and 4(b), the site and proposed zone are not required for development capacity for either business or residential purposes. I do not consider it appropriate to strictly apply the 'sufficient development capacity' tests to the Waitangi Estate in the same way that you would apply them to a request for a new residential or commercial zone.

101. The site is unique, both in a local and national sense, and the mixture of compatible activities around a site of such national significance cannot be provided elsewhere in the district. With this in mind, I consider that, in the unique situation of the Waitangi Estate, test (4c) is the most relevant test and the one that should be given the most weight in considering if the Waitangi Estate should be zoned WEZ. In my view, the environmental, social, cultural and economic benefits associated with protecting of the significant historic, natural and cultural values of the Waitangi Estate clearly outweigh the lost potential for land-based primary production, particularly when:
102. Farming is still a permitted activity in the largest sub-zone (the Ahuwhenua (General Activities) sub-zone).
103. The AgFirst report in Appendix D of the Section 32AA report confirms that, in contrast to the NZLRI LUC maps, there is no LUC 2 land and only a small area of LUC 3 land around the Treaty house and neighbouring buildings and on the grassed slopes between the golf course and the Waitangi Estuary. As such, there is less productive land being 'lost' compared to what the NZLRI maps indicate.
104. Overall, although Ms Jacobs and I differ in how we have assessed the NPS-HPL, we have both reached the same conclusion, being that the NPS-HPL does not prevent the rezoning of the Waitangi Estate from Rural Production to WEZ.

Impermeable Surface Rule (WEZ-R6)

105. The Waitangi submitters initially requested a 90% permitted impermeable coverage rule in the Whakanga (Tourism) sub-zone, subject to compliance with the Far North Engineering Standards 2022, as per the PDP rule for the Mixed Use Zone (MUZ) as notified. The Section 42A report has recommended amending MUZ-S10 – Coverage to replace the reference to the Engineering Standards with a requirement to dispose of stormwater within the site where a Council connection is not available and require an engineering/site suitability report to determine compliance with MUZ-S10.
106. In pre-hearing meetings with the Waitangi submitters, Ms Jacobs did not agree with the requirement for an engineering or site suitability report to determine compliance with the equivalent impermeable coverage rule WEZ-R6. As an alternative, Ms Jacobs has suggested dropping the permitted threshold from 90% impermeable to 70% impermeable, on the condition that no expert report is required to determine compliance. However, Ms Jacobs has also indicated that the current impermeable surface coverage across the Whakanga (Tourism) sub-zone is approximately 35%.

107. While I appreciate the desire of the Copthorne Hotel to have some flexibility to make changes to the impermeable coverage across their site without needing a resource consent or an expert report, there also needs to be certainty that any increases in stormwater can be managed appropriately. I see that there are two options available to strike an appropriate balance between flexibility and certainty. Either the impermeable coverage rule WEZ-R6:
108. Aligns with the approach to managing stormwater in the MUZ, i.e. signalling that a high level of coverage around 90% is appropriate, provided an expert report is provided to demonstrate that the stormwater solution is appropriate; or
109. Provide for a small increase in impermeable coverage as a permitted activity without the need for an expert report e.g. a 40% threshold, allowing a 5% increase compared to current coverage, with anything else higher requiring a resource consent to ensure stormwater is managed appropriately.
110. I consider that insufficient information has been provided from the Waitangi submitters regarding how stormwater is currently dealt with on the Copthorne site to the point that I could support a move away from the MUZ approach to managing impermeable coverage. More information may be provided by Ms Jacobs at the hearing to support the Waitangi submitters' preferred approach. At this stage, my recommended wording for WEZ-R6 in **Appendix 3** aligns with the MUZ chapter.

Activity status for non-compliance with NFL-R1

111. The Waitangi submitters have requested that there is an exemption for situations where activities in the WEZ are unable to comply with NFL-R1, being the rule that manages buildings and structures in an Outstanding Natural Landscape (ONL) or on an Outstanding Natural Feature (ONF). Under NFL-R1, non-compliance with the relevant permitted and controlled activity conditions within the coastal environment is a non-complying activity. The Waitangi submitters are requesting a discretionary activity path for the same non-compliance for buildings and structures in ONLs and ONFs within the WEZ.
112. The Waitangi submitters have provided no evidence as to why they should be exempt from this District Wide rule. I have spoken to Mr Wyeth who was the Section 42A report writer for Natural Features and Landscapes. His opinion is that given the sensitive nature of the coastal landscape, ecological evidence would need to be provided before such an exception should be considered. This has not been provided.

Exemption for the WEZ under CE-S4

113. The Waitangi submitters have requested that there is an exemption for small buildings and structures within the Mean High Water Springs (MHWS) setback under CE-S4. This exemption would allow buildings and structures that do not exceed 2m in height or 5m² in area to be exempt from the MHWS setbacks in CE-S4. I understand from the pre-hearing discussions that the reason for seeking this exemption is to provide for a range of structures associated with the yacht club that utilise parts of the Waitangi Estate and would provide for structures such as winches and racks/stands for boats.
114. I have spoken to the Section 42A report writer for Coastal Environment and Ecosystems & Indigenous Biodiversity Mr Wyatt. It is his opinion that amendments were made at Hearing 4 that enable the Waitangi submitters to accommodate the yacht club and, and that there is no evidence which would support further amendment. The amendment sought would result in WEZ and the yacht club being an outlier in terms of other District Plans and there is no evidence to support the same.

Signs in the WEZ

115. The Waitangi submitters have requested an exemption for the Waitangi Estate SPZ from the community signs rule SIGN-R2. They have also requested, as part of this rule, that community signs be limited to two per activity in relation to the Waitangi Estate. As outlined in the submitters' evidence, this is to enable signage for the various community facilities located on-site, including the boat ramp, slipway, jetty, pontoon, and similar.
116. In my opinion, the requested amendments to this rule are not workable in their current form. The rule, as requested, would apply to all zones except the WEZ. Therefore, specifying that community signs be limited to two per activity in relation to the Waitangi Estate is not appropriate within this rule structure. In my view, it is not necessary to manage community signs separately from other signs within the WEZ. Instead, for simplicity, signs including both community and other signs can be managed appropriately managed under the requested rule SIGN-R15 (Signs in the Waitangi Estate).
117. I agree with the intent of the requested SIGN-R15 however I have recommended the inclusion of an additional permitted activity standard (PER-1) within SIGN-R15 to ensure that signage in the WEZ complies with height, height-in-relation-to-boundary, and setback standards applicable to the zone—excluding the road boundary setback. This approach is consistent with the performance standards for signage in other zones.
118. I agree with the other two permitted activity standards as requested by the submitter. PER-2 requires that signs relate to the activity occurring on the Waitangi Estate, ensuring that signage remains relevant and

functionally tied to on-site activities. PER-3 requires that signs comply with the applicable signage standards including SIGN-S1 (maximum area), SIGN-S2 (maximum height), SIGN-S3 (maximum number), SIGN-S4 (traffic safety), and SIGN-S5 (sign design and content) which collectively manage the visual scale, placement, and safety of signage in a consistent manner.

119. I agree with the other amendments sought by the Waitangi submitters in relation to SIGN-S1 (Maximum sign area per site) and SIGN-S2 (Maximum height of signage), which proposes appropriate maximum sign sizes and heights for each subzone of the WEZ, along with corresponding matters of discretion.
120. However, I do not support the submitters' request to allow up to two signs per activity visible beyond the WEZ. In my opinion, this is excessive and could contribute to the proliferation of signage, resulting in adverse effects on the site's visual amenity.
121. While I agree in part with the general approach that signage should only be managed where it is visible beyond the Waitangi Estate SPZ, for example along Tau Henare Drive, which is a public road, there may be reason to manage internal signage differently due to its different impact from the public's visual amenity of the site the issue is complex.
122. It is agreed that the site is one of National and Historical significance. This means there are complexities and possibly unintended planning outcomes in allowing no control on internal signage on the sub zones. In particular by limiting the management of signs that are 'only visible beyond the Waitangi Estate SPZ'. The complexities regarding the use of 'visible beyond the site' signs provisions were outlined in the s42A report in Hearing XYZ. While it is accepted it is unlikely that the unfettered erection of signs will occur in a manner which will deliberately be visually obstructive or harmful, a concern is if no Rule or planning restriction is imposed there is a possibility that there could be significant adverse cumulative effects on the amenity of the Estate. This is underlined by land use provisions which largely control the scale of activities, but not their number.
123. There are several options available to address the issue of sign numbers. One option could be to set a maximum number of signs per site or per the WEZ. However, any such number would be arbitrary and could result in some activities being unable to display signage if the WEZ cap were reached. A per-site approach is also problematic due to the wide variation in site sizes and the range of activities occurring on them, which makes a consistent and equitable number of signs difficult to establish.
124. In my opinion, the submitters' general approach, allowing signage per activity, is the most appropriate. However, I recommend that this be limited to one sign per activity, rather than the two requested. I consider that one public-facing sign per activity is sufficient and better mitigates

potential adverse effects on the site's visual amenity as viewed from outside the SPZ.

125. I acknowledge that this approach may be challenging in some specific contexts, such as the Haruru walking track, which may require public facing signage at both ends. Should the submitters wish to propose more nuanced signage provisions to accommodate such situations, I would be open to reconsidering my position, provided the alternative approach appropriately addresses potential amenity effects.

Temporary activities - New Rue TA -RX

126. The Waitangi submitters have proposed a new rule for temporary activities in respect of the four sub zones. In respect of TA-RX PER -1 sub zones the following number of permitted activities sought in respect of the zones is as follows:
127. Whakanaga, Ahuwhenua (General Activities) - not to be used for more than two temporary activity events per calendar year.
128. the Ahuwhenua (General Activities) and the Papa Rehia (Recreational not used for more than five temporary activity events per calendar year.
129. Te Pitowhenua (Treaty Grounds) sub zone, there is no restriction on temporary activity events per calendar year.
130. Whakanga (Tourism), Ahuwhenua (General Activities) and the Papa Rehia (Recreational) sub zones the event does not exceed two consecutive days, with the exception of a week either side of Waitangi Day._
131. PER 2-PER 4 provides for the times when an activity can occur from, the set up and break down of the temporary structure and traffic movements. The Waitangi submitters are seeking activities in all subzones are able to take place from 5.00am to 10.00pm each day. I refer to my Section 42A in respect of Temporary Activities. The Waitangi submitters in respect of Whakanaga, Ahuwhenua (General Activities) sub zone have not sought an exemption from the PDP from two events per calendar year. I agree with this approach in respect of Whakanaga, Ahuwhenua (General Activities) sub zone.
132. The seeking of five temporary activities per calendar year in the Ahuwhenua (General Activities) and the Papa Rehia (Recreational sub is outside the definition of temporary activities definition in the PDP.
133. My recommendation to the Hearing Panel in respect of TA-R1 PER-1 in hearing 6/7 was to allow the Waitangi Estate to hold a maximum of five events on the Treaty grounds per calendar year, this is sub zone Te Pitowhenua (Treaty Grounds).
134. Commencement time as sought in PER2- PER 4. At hearing 6/7 the Waitangi submitters did discussed the events at the Treaty grounds

commencing before 6.00am, no commencement time was actually mentioned. In terms of the general approach of the Ahuwhenua (General Activities) and the Papa Rehia (Recreational) sub zones five temporary activities is in line with what was discussed at hearing 6/7 and while it is acknowledged the five temporary activities at hearing 6/7 was in reference to the Te Pitowhenua (Treaty Grounds) sub zone only. I am in agreement with evidence as set out in the S32AA of Ms Jacob's and the evidence of the other Waitangi submitters in respect of the Ahuwhenua (General Activities) and the Papa Rehia (Recreational) have annually events.

135. The Waitangi submitters have not provided evidence why these subzones need to have a 5am commencement time, this being one hour prior to the 6.30am time in TA-RI. Should the Waitangi submitters provide further evidence I am open to reconsidering my position.
136. Te Pitowhenua (Treaty Grounds) sub zone – the Waitangi submitters have requested in respect of this zone there be no limits to the number of temporary activities per calendar year. The rationale for this was so large events such as ANZAC and Matariki do not trigger the need for the Waitangi Estate to have to apply for a resource consent.
137. I made enquiries with other Councils who hold large events such as ASB Polyfest and the Te Matatini festival. Both those events are large annual temporary activities over a number of days attracting vast numbers of people, with set up commencing very early in the morning.
138. Both ASB Polyfest and the Te Matatini festival have to apply to the respective Councils' annually for a resource consent. The Waitangi submitters have provided no evidence as to why they should not have to apply for a resource consent for events other than Waitangi Day or why their events should be treated differently than events such as ASB Polyfest or Te Matatini.
139. Officers recommended additional allowances in respect of the Temporary Activities Rules to address the national significance and importance of Waitangi Day. I can find no other district plan that allows unlimited Temporary Activities with or without restrictions or controls. Allowing unlimited Temporary Activities raises the issue that the activity no longer becomes a temporary activity. The definition of 'temporary' means lasting for a limited time. If the activity is allowed to occur in an unlimited way it is no longer temporary.
140. Given the above I cannot support the suggested rule in respect of the Te Pitowhenua (Treaty Grounds) sub zone. I recommend the Rule for this sub zone be five temporary activities per calendar year. The submitter might wish to provide some further information in evidence about how to accommodate the intended activities on Te Pitowhenua.

Consideration of evidence provided by HNZPT

141. I agree in general with the evidence of Mr Bracey, he confirms HNZPT supports the WEZ. In respect of the WEZ the significant and important aspect is HNZPT confirms they are of the view the WEZ will adequately manage any adverse effects of land use activities while protecting the national heritage and cultural values of this site and they have a good collaborative working relationship with the Waitangi submitters.

Recommendation

142. For the above reasons, I recommend that the submissions S531.008 – 531.001 and S502.108, 502.110-112 from the Waitangi submitters and the land known as the Waitangi Estate be rezoned as 'Waitangi Estate Special Purpose Zone' or WEZ.
143. For the above reasons, I recommend that the submission (S185.001) be accepted in part from Doug's Boat Yard and the land known as the Waitangi Estate be rezoned as 'Waitangi Estate Special Purpose Zone' or WEZ.
144. For the reasons above I recommend the submission (S409.049) from HNZPT be rejected and FS (51.34) from HNZPT be accepted in part.

Section 32AA Evaluation

145. I consider the recommended WEZ, and changes are appropriate to achieve the objectives in accordance with Section 32AA of the RMA.

4 Table 2 Conclusion

146. This report has provided an assessment of submissions received in relation to rezoning requests for a special purpose zone for the Waitangi Estate. The primary amendments that I have recommended are:
147. Rezone the land known as the Waitangi Estate as 'Waitangi Estate Special Purpose Zone' or WEZ.
148. Within the WEZ, apply four 'sub-zones' to direct specific types of activities to appropriate parts of the WEZ.
149. Insert a new chapter containing provisions for the WEZ, as set out in **Appendix 3**.
150. Make consequential amendments to the district wide chapters to reference the WEZ, as set out in **Appendix 3**.
151. Section 5.3 considers and provides recommendations on the decisions requested in submissions. I consider that the submissions relating requests for a special purpose zone for the Waitangi Estate should be



accepted, accepted in part, or rejected, as set out in **Appendix 1** and **Appendix 2** and my recommendations of this report.

152. I consider that the combination of a new WEZ, combined with my recommended consequential amendments to district wide chapters, will be efficient and effective in achieving the purpose of the RMA, the relevant objectives of the PDP and other relevant statutory documents, for the reasons set out in the Section 32AA evaluations undertaken.

Recommended by: Lynette Morgan – Policy Planner, Far North District Council.

Approved by: Tammy Wooster, Manager Integrated Planning - Far North District Council.

Date: 4 August 2025.