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23 June 2025

Lynette Morgan

Policy Planner – District Plan

Far North District Council

Tēnā koe Lynette,

Re: Archaeological Review of the Waitangi Special Purpose Zone

This report provides a review of various documents presented in support of the proposed Waitangi Estate Special Purpose Zone (Lot 1 DP 326610, Lot 2 DP326610, Lot 3 DP326610, Lot 2 DP 152502, Lot 1 DP 152502). The purpose of the review is to provide advice to Far North District Council (FNDC) staff on the following matters:

- Does the reviewer support the summary of results and the recommendations?
- Is further archaeological study appropriate and what form would that take?
- Are there archaeological matters that mean that re-zoning is inappropriate?

1. Reviewer Qualifications and Experience

I hold advanced degrees in archaeology from University College London, UK (PhD) and the University of Otago (MA). I have over fifteen years archaeological experience in New Zealand and have also worked in both commercial and research archaeology in Australia and the United Kingdom. This includes experience working in Northland and the Bay of Islands and technical expertise in remote sensing, spatial analysis, and the analysis of Māori material culture.

2. Review of Proposed Waitangi Special Purpose Zone – Waitangi Limited

The first phase of this process involved a review the Statement of Evidence of Rochelle Jacobs, which provides an overview of the proposed Waitangi Estate special purpose zone (WEZ).

The evidence provided in support of the WEZ includes various historical summaries, which accurately recognise the importance of Waitangi throughout all periods of the history of Aotearoa (e.g., Statement of Evidence of Bill Edwards). Detail about archaeological sites on the Waitangi Estate was limited to a map showing the recorded archaeological sites on the estate ('Annex C').

I have conducted a desk-based review of the estate, including historical survey plans, aerial photographs and New Zealand Archaeological Association data and found that the evidence presented in the map is correct. However, Annex C represents sites as points, which does not convey the low-level of spatial accuracy with which many are recorded. Moreover, 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. It is my view that the current condition of the archaeological record on the Waitangi Estate may therefore create challenges for effective management, particularly if the location of recorded sites is relied upon as the primary heritage management screening tool.

I have also reviewed several archaeological documents written by Donald Prince. These documents show an existing process by which projects or annual work plans are assessed for their potential to cause effects to archaeological sites. If effects are identified, these are managed through the provisions of the Heritage New Zealand Pouhere Taonga Act (2014).

While the HNZPT process is clear, I would be interested to understand procedure that leads to archaeological advice being sought. For instance, is there a management document (e.g., an estate-wide heritage management plan) that outlines the required process to go through when work programmes are being developed, are yearly work plans developed and routinely assessed or are assessments primarily triggered when a resource consent is required? If it is the resource consent process that drives archaeological assessment, is it possible that the changes that reduce the need for consented activity in the WEZ may result in fewer archaeological assessments taking place?

The current approach to archaeological management is appropriate at the project scale, but, through time, such an approach may result in incremental loss of heritage values due to uncoordinated management. Moreover, the current approach may not be consistent with the goal of the WEZ to provide better operating conditions on the estate. If such a document does not exist, a Waitangi Estate heritage management plan based on more accurate survey and assessment of recorded sites would address the issues raised above. This sort of document could contain a risk map, whereby high-risk zones requiring further archaeological advice and low risk zones where an accidental discovery protocol is appropriate could be identified alongside high and low risk activities. This, or a similar mechanism as part of a management plan would align with the goals of the WEZ.

3. Conclusions

The rationale for placing the Waitangi Estate in a special purpose zone is clearly stated and there are no archaeological matters that specifically prohibit rezoning.

It would be useful to get some clarity about the process that leads to archaeological assessments and whether this may be negatively impacted by fewer consents being sought.

Based on my understanding, the current archaeological management process meets legal requirements, but, given the historical importance of the Waitangi Estate, cannot be regarded as best practice. While beyond the scope of the re-zoning process, the protection of archaeological sites on the Waitangi Estate would be greatly enhanced by the commission and implementation of an archaeological management plan. As a foundation this should include provision for an update of the spatial information of recorded archaeological sites to ensure an accurate and up-to-date record of the resource.

Please contact me if you have any questions about the advice provided.

Noho ora mai,



Dr Andrew Brown

Director | Principal Archaeologist

Horizon Archaeology Ltd

Technical Memorandum

To: Lynette.Morgan@fndc.govt.nz

cc: Theresa.Burkhardt@fndc.govt.nz

From: Julianne Chetham

Date: 23/06/25

Subject: PDP Hearing 15B Rezoning Requests for new Special Purpose Zones: Cultural impact support/review - Request to Rezone the Waitangi Estate/ Waitangi Limited (Submitter 503)

1. Introduction

The review of the Far North District Plan is currently underway and the PDP project team requires technical support for rezoning hearings to inform preparation of S42A Hearing reports. I have undertaken a review of the cultural evidence and cultural values assessment provided by Waitangi Limited (Submitter 503) in support of their rezoning request. This review is from a cultural effects perspective and focuses on the efficacy of the assessment and proposed precinct provisions in relation to cultural matters. This has also necessitated a brief review of relevant District Wide provisions such as the Tangata Whenua and SASM chapters.

Waitangi Limited's (WL) reasoning for seeking a SPZ is due to the zones and overlays in the proposed DP applying to the site that are lacking a cohesive approach and would result in outcomes such as rural production imperatives being prioritised and minor day-to-day management of Te Pitowhenua/ the Waitangi Treaty grounds and wider Estate being constrained. WL highlight that the proposed objectives and policies for these zones do not reflect the unique and historic significance of the Waitangi Estate lands as New Zealand's foremost national landmark and the proposed Special Purpose Zone method that would better enable focussed and comprehensive management of the site and achieve consistency with the purpose of the RMA, s6 matters, and also the wider interests of New Zealanders as envisaged by the Trust Board Act.

In writing this memo, I have reviewed the following documents:

- Statement of Evidence of Ngahuia Ramari Harawira (SOE)
- Statement of Evidence of Ben Dalton
- The Section 32AA Evaluation Report provided by Northland Planning and Development
- Cultural Values Assessment prepared by Ngahuia Ramari Harawira
- Minute 14 of the Independent Hearings Panel
- S42A Report Strategic Direction
- S42A Report Tangata Whenua
- S42A Report Sites and Areas of Significance to Māori
- Submission #503 on behalf of Waitangi Trust
- Submission #389 from hau kainga of Ngāti Rahiri, Ngāti Kawa

2. Discussion

2.1 Mandate

It is generally accepted best practice that Cultural Impact or Values Assessments (CIA or CVA) are carried out by the affected tangata whenua or a practitioner of their choosing in collaboration with them.¹ This ensures a good understanding of tangata whenua matters of relevance to the subject site/locale and that the assessment has appropriate support from tangata whenua.

In this instance Ngahuia Harawira confirms she has mandate to prepare the CVA in section 2 of her Brief of Evidence which states,

"I am confident in the tikanga of Te Whare Tapu o Ngāpuhi and accept that there are tikanga unique to each takiwā of Te Tai Tokerau. I have experience in practicing those tikanga, both on the Marae and through wānanga. I have been invited to prepare a cultural values assessment (CVA) on behalf of the Haukāinga in respect of Waitangi Limited's submission. I am able to speak with authority on these matters."

I see no reason to dispute this statement and am aware of the CVA author's whakapapa, mahi and various kaupapa she is involved in, including relationships held with key leaders of Waitangi and Te Tii Marae etc.

The CVA's introduction "Hei Timatanga" section correctly identifies the importance of the CVA as a crucial document in the context of WL's rezoning proposal, and emphasizes the significance of the Waitangi estate to the Haukāinga and Ngāpuhi more generally. I endorse the identification and prioritisation of haukāinga as defined in the CVA, eg.

"The term Haukāinga refers to local and neighbouring hapū and iwi who hold ancestral, historical and contemporary relationships with the whenua and includes local hapū, Ngāti Rāhiri, Ngāti Kawa and Te Matarahurahu, the wider Te Whare Tapu o Ngāpuhi",

This section also notes the difficulty in preparing a comprehensive Cultural Values Assessment in the absence of a master plan or detailed information regarding future developments at the estate. I agree with this sentiment as it is far easier to assess an activity rather than a zone and provisions. Given that the sentiment behind the rezoning proposal is to avoid multiple assessments for activities, it does highlight the need for a close working relationship with tangata whenua. Ngahuia Harawira points out that this lack of clarity has been raised as a concern by the Haukāinga and the necessity for the Haukāinga to be afforded a genuine opportunity to articulate their aspirations for the Estate. Ideally, the WEZ mapping and provisions would have been co-designed alongside the haukāinga (I acknowledge that the governance and operational structures of the Trust do have representatives of the relevant hapū and iwi). Notwithstanding this, WL has initiated engagement with the haukāinga and the CVA and its recommendations offer a pathway forward in this regard. Further I note there do not appear to be any further submissions opposing WL's relief from tangata whenua, and HNZ Pouhere Taonga generally supports.

2.2 Methodology

Section 2 of the CVA and s4.2 of the author's SOE set out the assessment approach including the engagement undertaken, literature reviewed and recommendations developed. Two specific hui were held and while it is obvious that key leader/s were engaged, it is unclear how many attended the online hui (there does not appear to be a hui record). It appears the CVA was undertaken in response to the specified hearings process and possibly subject to time and other constraints. As mentioned previously this highlights that ideally, consultation and engagement should occur early in the development of such a rezoning proposal. Regardless, the writer has provided a concise summary of the kaupapa identified at

¹ eg. See Quality Planning Website; <https://www.buildingbetter.nz/wp-content/uploads/2024/08/BBHTC-Cultural-Impact-Assessment-Toolkit-publication-WEB.pdf>; and Chapter D.1 of the Northland Regional Plan for more Information,

the wananga and hui and identified the correct groups and members to focus engagement with. The literature reviewed included relevant documentation from the Te Paparahi o Te Raki Waitangi Inquiry, and various hapū, whānau submissions and Section 32 Reports to this PDP process.

The CVA does not specifically mention Iwi/Hapū Environmental Management Plans, although the S32AA refers to them and the proposed Tikanga Whakahaere identifies the value of these as a tool for Haukāinga to develop in future. This is not a gap in the CVA because I do not consider that there are any Iwi or Hapū Environmental Management Plans of specific relevance to this proposal at this point in time.

Much of the focus of the feedback from Haukāinga in section 2 is about improving the relationship and two-way capacity building between the parties, and some of the methods for doing so may not sit easily within PDP provisions. The other matter, being the lack of clarity on future development plans for the estate and how to provide adequate protection for cultural values in the absence of this has steered recommendations towards comprehensive sites of significance mapping and improved relationship/MOU as tools and I discuss this later.

2.3 Relationship to the Site

Section 3 of the CVA provides spatial context to the Waitangi site and the relationship of tangata whenua to it. This provides a useful link to the policy framework (eg. Māori provisions of Part 2 RMA and lower order documents). It helpfully steps through the shortcomings of the PDP zoning for Waitangi Estate from a Haukāinga perspective, namely the PDP as notified;

- *offers little policy support for any future land use developments that WL or the Board may want to pursue separately or in partnership with Haukāinga;*
- *will limit the relationship between WL, the Board and the Haukāinga;*
- *fails to recognise the's local, regional, national and international importance of Waitangi – that it operates as a National Marae and a physical meeting point for Māori and the Crown; and*
- *overlooks the need to have a unique and comprehensive management approach tailored to the rich and diverse history of the Estate.*

There is no readily discernable corresponding analysis of the alternative proposed WEZ provisions and how they may or may not provide for the aspirations voiced through the wānanga, hui and literature review that have informed the CVA. There is strong support for a tailored approach for the Estate including the 4 proposed sub zones providing an opportunity to balance the preservation of the historic character, natural features and landscape values of the area against future land use activities that are sensitive to these attributes. It's not clear from the CVA whether support from this approach came from the wananga/hui held or literature reviewed. WL's S32AA (at sections 10.29 - 10.30) does refer to an initial meeting early in the process with representatives of Te Tii Marae where the plan to utilise sub zones was discussed. Therefore we can infer that the SPZ and subzoning approach is endorsed.

2.3 Historical and contemporary context

Section 4 of the CVA sets out a comprehensive historical context of the people and place of Waitangi prior to Te Tiriti o Waitangi while more contemporary Haukāinga relationships and their demonstration of tino rangatiratanga are described in section 5. This information is directly sourced from Haukāinga Tribunal reports and various submissions and in my view is therefore beyond challenge. There is reference to Haukāinga submissions (eg. #389) and the amendments suggested in relation to the Tangata Whenua and SASM chapters. Given that these submission points do not necessarily relate to the WEZ, have not all been accepted by the Officer/s and decisions are yet to be determined by the Panel, I am unsure how much reliance can be placed on them in terms of providing direction for the WEZ, although they do signal management aspirations and identify areas of concern more generally. Nonetheless, the TW and SASM chapters will apply to the WEZ and will offer an additional level of protection for cultural values.

2.4 SPZ

Section 6 of the CVA emphasizes the national significance of the Waitangi Estate and supports the SPZ including the 4 sub zones as an appropriate way of recognising this. It applies a framework (see section 6.5) recognising Te Tiriti through;

1. *Kaitiakitanga: Special Purpose Zoning offers four sub-zones that require specific regulations aimed at preserving or enhancing environmental features, ensuring that the Estates natural resources and ecosystems are respected and sustainably managed for future generations.*
2. *Access and Participation: The Proposed Tikanga Whakahaere identified in this Report opens the corridor for meaningful Haukāinga engagement regarding future developments on the Estate.*
3. *Education and Heritage: The Special Purpose zoning promotes continued education and the sharing of the Estates historical and cultural significance, enhancing the rich and diverse history of Aotearoa. However, Mr. Apiata's comments regarding educational pathways for building cultural capacity offer an alternative means of ensuring that the approach extends beyond standard practices, thereby fostering a more meaningful and enduring outcome.*
4. *Sustainability for Future Generations: By recognising the Estate's national significance, the proposed Special Purpose Subzones could ensure that it remains protected, not just as a site of historical importance but as a living space for future generations. This could include provisions for preservation, sustainable tourism, and community involvement in the Estate's care.*

In my opinion, this usefully outlines that the WEZ proposal works conceptually to support these principles. What is less clear is whether the provisions themselves will provide for adequate implementation. Much reliance is placed on the proposed Tikanga Whakahaere and I return to that later.

Section 7 of the CVA helpfully identifies the positive impacts of the SPZ, further detailing how the subzones will support cultural and environmental wellbeing and noting the importance of further engagement with Haukāinga to undertake comprehensive identification and mapping of sites and areas of significance to Māori. Positive economic effects are considered to result from the proposal but this is balanced against the need for capacity building for Haukāinga to appropriately support education and engagement and other events and activities across the zone as a whole. I agree that the SPZ mapping and subzones will allow a more nuanced approach for Haukainga in responding to and engaging on specific kaupapa across environmental, cultural, social and economic wellbeings.

2.5 Tikanga Whakahaere

Section 8 of the CVA makes recommendations, centered upon the proposed Tikanga Whakahaere that the author has drafted. These denote terms of reference and a set of values proposed to assist WL and the Waitangi Trust Board in managing any future land developments in a culturally appropriate way. It is also suggested that the proposed Tikanga Whakahaere could possibly be utilised in establishing rules for each Subzone of the Special Purpose Zone – this is discussed further below.

I consider the scope, parties identified and principles are relevant and generally capture either what has come through the CVA engagement process and in submissions and other relevant literature. Some of the tikanga and key areas of engagement are generally reflected in the draft provisions for the WEZ (eg. the intentions for environmental management, protection of wāhi tapu and cultural landscapes).

It is clear that there is a disconnect between the ways the various authorities (HNZPT, NRC, FNDC) have mapped heritage areas across the estate. I concur with the author of the CVA that a comprehensive and collaborative mapping exercise in partnership with Haukāinga is an urgent priority. The CVA and submissions have pointed out the lack of capacity for Hāukainga to respond to the various planning processes and the need for adequate resourcing. Given that SASM chapter decisions are yet to be made, it is unclear how quickly some of these recommendations will be able to be implemented. However, I consider some of that responsibility will also lie with the applicant.

In terms of the WEZ provisions there is no detailed analysis of these in the CVA and how they link (or could link) to the proposed Tikanga Whakahaere. In my review of the provisions, I consider they are consistent with Part 2 of the RMA and the higher-level documents for example;

WEZ-O3 The relationship of Māori and their culture and traditions associated with the Waitangi Estate lands, adjacent coastal waters, sites, waahi tapu, and other taonga is recognised and provided for [eg. aligns to RMA S6E and TW-04].

However, there is no strong WEZ policy corresponding to this objective as WEZ-P6 relates to “historic heritage” only, although WEZ-P2 and WEZ-P3 will encompass cultural values, perhaps in a more peripheral way. The district wide chapters do provide confidence that if there is a gap, TW-P3, TW-P5 and TW-P6 offer a pathway for tangata whenua engagement. WEZ rules and standards include matters of control for subdivision and matters of discretion such as;

WEZ-R1

f. Any adverse effect on historical spiritual or cultural association with the land held by tangata whenua, with regard to the matters set out in Policy TW-P6;

WEZ-R6

g. extent of potential adverse effects on cultural, spiritual, heritage and/or amenity values of any affected waterbodies; and

WEZ-S2 – eg. setbacks from waterways and WEZ-S34 landscaping - ((i) and (d)) avoiding adverse effects on areas containing historic heritage and sites of significance to Māori

Given the aim of the SPZ is to limit the amount of resource consenting required, presumably much of the relationship with, and input from Haukāinga will occur outside of a consenting pathway. That is not necessarily a negative thing, and the CVA clearly supports the SPZ approach to create a simpler bespoke management regime that better reflects both the Waitangi Estate’s governance imperatives and Haukāinga values and aspirations. What this does mean though, is that the relationship agreement/MOU between WL, the Trust and the Haukāinga is crucial to provide certainty that the proposed Tikanga Whakahaere - a key tool for implementation - will be upheld/implemented. The S32AA identifies that these sit better outside the PDP and also notes they require further deliberation and agreement between the parties. The CVA author acknowledges that the proposed Tikanga Whakahaere are offered in draft as a starting point to build the partnership. It is a high trust model. While outside my area of expertise or scope the S42A planner/officer could give consideration as to how/whether the proposed Tikanga Whakahaere can be incorporated by reference (even as a living document) or cemented in some way into the SPZ if at all possible.

3. Conclusions and recommendations

Overall, the CVA and associated cultural evidence accurately captures the tone of the Hāukainga response to WL’s SPZ proposal. While the CVA could perhaps have been formatted differently to allow more detailed analysis of the SPZ and consequent WEZ provisions, it is well written and the proposed Tikanga Whakahaere provides a comprehensive, positive and meaningful foundation for partnership between the parties going forward. The proposed Tikanga Whakahaere incorporates the pou/pillars of the cultural relationship to Waitangi Estate, including kaitiakitanga and other key values, aligning in a cohesive way with the SPZ, and subzones. While it is a high trust model, there will be safeguards in the WEZ provisions and overarching Tangata Whenua and SASM chapters (along with other overlays) that should ensure no significant adverse effects diminish cultural values.

Tangata whenua have been defined as Haukāinga in a way that correctly identifies the hapū and entities (eg. Te Tii Marae) most affected by the proposal, but is also inclusive of wider Ngāpuhi nui tonu and Māori more generally, given the significance of the Waitangi Estate.

An important takeaway from my review of the CVA and associated documentation is there appears to be no dispute from tangata whenua of Waitangi that the SPZ proposal provides a better mechanism to support Haukainga aspirations for the protection of cultural values than the PDP as notified.

To reiterate my point above, while outside my area of expertise or scope the S42A planner/officer could give consideration as to how/whether the proposed Tikanga Whakahaere can be incorporated by reference (even as a living document) or cemented in some way into the SPZ if at all possible.

Memorandum



To Lynette Morgan
Senior Policy Planner - District Plan, FNDC

From Melean Absolum
Landscape Architect, MALtd

Date 17 June 2025

Dear Lynette,

SUBMISSION 503 WAITANGI LIMITED

INTRODUCTION

This memorandum records my initial advice, prepared on behalf of Far North District Council (FNDC), in response to Submission 503 from Waitangi Limited, requesting a bespoke Special Purpose Zone for the Waitangi National Trust Estate (Estate) be included in the Proposed District Plan (PDP).

The Submitter's evidence has provided both precinct provisions and technical assessments to support the request. I have relied on the following information in preparing this advice:

- Waitangi Limited's submission number 503;
- PDP provisions as notified;
- PDP maps including zones and Natural Environment Overlays;
- Proposed precinct provisions;
- Evidence and attachments of Messrs Ben Dalton, Simon Cocker, Ms Rochelle Jacobs and Ms Ngahuia Harawira.

I am reasonably familiar with the Estate and have visited many times in recent years, including using the wharf at the yacht club in May and walking the Haruru Falls Track in February.

THE PROPOSED PROVISIONS

I am generally supportive of the inclusion of bespoke precinct provisions for the Waitangi Estate in the PDP. From a landscape perspective, whether the plan relies on:

- a special purpose zone;
- a development area; or
- a precinct

is not as important as what the provisions allow.

I support the proposal to create 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

the Estate to protect the features and values found there, while still having over-arching objectives and policies that apply to the Estate as a whole.

The four sub-zones are based on landscape assessment work carried out by Mr Cocker in which different character areas and their sensitivities were identified. Although the character areas and sensitivity ratings are not exactly the same as the proposed sub-zone areas, in my opinion the small differences arise from a simplification of areas and are not material to the protection of landscape and natural character values.

Generally, I think the proposed Waitangi Estate Special Purpose Zone provisions will ensure that the various landscape and natural character values identified will be protected, while enabling both appropriate development and management activities to occur within the Estate.

WEZ-R1 deals with new buildings and structures and extensions to existing buildings and structures. In my opinion the various thresholds applied through WEZ-S1 appropriately respond to the landscape sensitivity of the various sub-zones, enabling greater development opportunity where existing values and levels of visibility are reduced and carefully managing development elsewhere on the Estate, particularly within Te Pitowhenua (Treaty Grounds) sub-zone.

Additionally, the matters of discretion in WEZ-R1 requires consideration of an appropriate range of factors that could have landscape and natural character effects. I wonder if 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'* in criteria g. could be replaced by inclusion of that plan within the PDP, perhaps by way of a hotlink. This might avoid difficulties in locating this plan in the future.

As well as providing provisions for the new Special Purpose Zone, Ms Jacobs has also recommended a number of consequential changes to rules in other chapters of the PDP, including Natural Character and Natural Features and Landscapes. Reference to Te Pitowhenua (Treaty Grounds) and Papa Rehia (Recreation) sub-zones have been added to NATC-R1 for Park Management activities. I agree that these two sub-zones host activities that are akin to park management activities.

In the Natural Features and Landscapes chapter, Ms Jacobs states:¹

"An additional permitted standard has been added for a minimum building size within the ONL area within the Te Pitowhenua (Treaty Grounds) sub-zone. The proposal is for a minimum size of 30m²."

Firstly, I think the word 'minimum' (twice) should be 'maximum'. I also note that Mr Cocker states that an additional permitted standard has been added for a minimum building size with the ONL.² I understand that Ms Jacobs has confirmed that these are a typographical errors.

¹ Paragraph 12.3g (page 35) of the evidence of Ms Rochelle Jacobs, dated 30 May 2025

² Paragraph 8.6 (p15) of the evidence of Mr Simon Cocker dated 30 May 2025

Secondly, I cannot find the standard Ms Jacobs refers to in the NFL chapter of the proposed provisions provided as Appendix K to the s32AA report. I assume that this is a typographical omission.

I note that in his comprehensive assessment report Mr Cocker included two sets of almost identical assessment criteria one for Te Pitowhenua (Treaty Grounds) and one for Aruwhenua (General Activities) sub-zones. In his evidence³ Mr Cocker explains that in his opinion, Ms Jacobs has adopted the themes of his criteria when developing the Special Purpose zone provisions, but in a way that is consistent with the assessment criteria contained in the PDP, and that he finds this acceptable.

On the same topic, Ms Jacobs records⁴ that she considers including Mr Cocker's criteria in that form would be contrary to the structure of the PDP, which does not use assessment criteria for discretionary activities, but relies on the objectives and policies in decision making. She has, instead, incorporated the themes of Mr Cocker's assessment criteria and included them in the WEZ provisions for activities which are restricted discretionary. Mr Cocker confirms⁵ that he considers this to be acceptable. In my opinion, Mr Cocker's assessment criteria provide much more detail in relation to landscape and natural character values, than the objectives and policies of the proposed Special Purpose zone. Nevertheless, I do concede that the themes of Mr Cocker's assessment criteria are largely repeated within the restricted discretionary assessment criteria of WEZ-R1.

I have compared Mr Cocker's assessment criteria with the proposed restricted discretionary assessment criteria in some detail. I note that the only obvious difference is the exclusion in the proposed provisions of any consideration of whether buildings are sited and designed so they do not visually intrude on any significant ridge line or skyline. I think it would be appropriate to add an additional criteria to WEZ-R1 to cover this matter.

CONCLUSIONS

I am supportive, in principle, of the inclusion of a Special Purpose Zone for Waitangi Estate within the PDP. Other than the minor corrections and additional assessment criteria I have highlighted above, I am satisfied that the proposed provisions provided will appropriately protect the important landscape and natural character values of the Estate.



REGISTERED
LANDSCAPE
ARCHITECT

Melean **Absolum**
Dip LA FNZILA
17 June 2025

³ Paragraph 7.13 (page 14) of the evidence of Mr Simon Cocker dated 30 May 2025

⁴ Paragraph 12.3g (page 35) of the evidence of Ms Rochelle Jacobs, dated 30 May 2025

⁵ Paragraph 7.13 (page 14) of the evidence of Mr Simon Cocker dated 30 May 2025