

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

IN THE MATTER of the Resource Management Act 1991

AND

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

**STATEMENT OF EVIDENCE OF SIMON JOHN COCKER (LANDSCAPE
EFFECTS) FOR WAITANGI LIMITED (SUBMITTER 503)**

HEARING 15B (REZONING – NEW SPECIAL PURPOSE ZONES)

20 May 2025

BUDDLE FINDLAY

Barristers and Solicitors
Wellington

Solicitors Acting: **Dave Randal / Libby Cowper**
Email: david.randal@buddlefindlay.com / libby.cowper@buddlefindlay.com
Tel 64 4 462 0450 / 64 4 462 0926
Fax 64 4 499 4141 PO Box 2694 DX SP20201 Wellington 6011

1. INTRODUCTION

- 1.1 My name is Simon John Cocker. I am the Principal Landscape Architect at Simon Cocker Landscape Architecture.
- 1.2 My evidence is given on behalf of Waitangi Limited (Submitter 503) in relation to the Proposed Far North District Plan (**Proposed Plan**).
- 1.3 Waitangi Limited's submission relates solely to the Waitangi National Trust Estate (**Estate**) which contains the historic Waitangi Treaty Grounds / Te Pitowhenua (**Treaty Grounds**). It is responsible for managing the day-to-day operations at the Estate.

2. QUALIFICATIONS AND EXPERIENCE

- 2.1 I have the following qualifications and experience relevant to the evidence I shall give:
 - (a) My qualifications and experience are Bachelor of Arts in Geography and a Master of Philosophy in Landscape Design, both from the University of Newcastle upon Tyne. I have more than 25 years' experience as a landscape architect, practising primarily in the United Kingdom and New Zealand. In New Zealand, I was employed from 1994 to 2002 as a landscape architect by Boffa Miskell Limited at both their Auckland and Whangarei Offices. From 2002 to 2004, I was a Parks Landscape Officer at the Whangarei District Council. Until August 2009, I was employed as a Senior Landscape Architect by Littoralis Landscape Architecture. Since that date I have been practising as Simon Cocker Landscape Architecture.
 - (b) I am a Registered Member of Tuia Pita Ora, the New Zealand Institute of Landscape Architects (**NZILA**).
 - (c) As a consultant, my primary focus of work has been landscape planning. This has involved assessing the visual or landscape effects of a range of plan changes and development projects including private dwellings, subdivisions, commercial developments, infrastructure projects, extensions to power stations and quarries, and developing mitigation strategies for those activities.
 - (d) I have also assisted Auckland, Whangarei, Kaipara, and Far North District Councils with the assessment of resource consents and private

plan changes from a landscape and visual perspective, and with the provision of landscape architectural advice regarding consenting matters.

3. CODE OF CONDUCT

- 3.1 While this hearing is not before the Environment Court, I acknowledge that I have read the Environment Court's Code of Conduct for Expert Witnesses (contained in the 2023 Practice Note) and agree to comply with it. Except where I rely on the evidence of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from my expressed opinions.

4. BACKGROUND AND ROLE

- 4.1 I was engaged by Waitangi Limited in February 2023 to undertake a landscape assessment to support its submission on the Proposed Plan which seeks to create a new special purpose zone (within the meaning of the National Planning Standards (November 2019 – Updated February 2022)) to apply to the Estate.
- 4.2 I subsequently prepared an assessment of the landscape values and sensitivities throughout the Estate, and the appropriateness of a special purpose zone as a planning tool to protect those values and sensitivities. I undertook this work in consultation with Waitangi Limited's consultant planner, Ms Rochelle Jacobs.
- 4.3 That report (**Assessment of landscape effects**)¹ is now complete and in my evidence, I provide an overview of my findings. The Assessment of landscape effects is included at Appendix C of the report Ms Jacobs has prepared under section 32AA of the Resource Management Act 1991 (**RMA**) to assess the proposal (**s32AA report**).
- 4.4 Ms Jacobs originally proposed the use of a special purpose zone for the Estate and I have been assisting her with the preparation of a proposal to that end. This has included the provision of advice to define the extent of proposed sub-zones and the drafting of provisions for a special purpose zone, including the treatment of those proposed sub-zones. The Waitangi

¹ Simon Cocker Landscape Architecture Limited. 2025. *WAITANGI ESTATE SPECIAL PURPOSE ZONE. Assessment of landscape effects Rev 9*.

Estate Special Purpose Zone proposal is included at Appendix L of the s32AA report.

- 4.5 I also prepared and presented evidence on behalf of Waitangi Limited at hearing four (natural environment values and coastal environment). My evidence (dated 22 July 2024) addressed the proposed use of a special purpose zone and responded to matters relating to Waitangi Limited's secondary 'fall-back' relief, including responding to the Far North District Council's (**Council**) reports prepared under section 42A of the RMA. I refer to parts of my hearing four evidence below.

5. SCOPE OF EVIDENCE

- 5.1 The purpose of my evidence is to:

- (a) provide a high level summary of the landscape values and sensitivities at the Estate;
- (b) explain how the understanding derived from the assessment of values and sensitivities has informed the development of the proposed special purpose zone plan and provisions (**Waitangi Estate Special Purpose Zone proposal**);
- (c) set out why I consider that the Waitangi Estate Special Purpose Zone proposal is an appropriate means of protecting those values and sensitivities; and
- (d) provide an updated post-hearing four response on the Proposed Plan provisions as they relate to the Waitangi Estate Special Purpose Zone proposal.

- 5.2 I confirm that in preparing my evidence I have read in draft the evidence of Mr Ben Dalton and Ms Jacobs for Waitangi Limited, and the Cultural Values Assessment prepared by Ms Ngahuia Harawira, expert in cultural matters, for Waitangi Limited.

6. KEY LANDSCAPE CONSIDERATIONS AT THE ESTATE

- 6.1 For ease of reference, I restate the sections from my hearing four evidence that detail the key landscape considerations at the Estate below.

- 6.2 The Estate is situated on the north side of Waitangi.² It includes, but is not limited to, the Treaty Grounds. The Estate is 506 hectares in total and is bounded by Haruru Falls Road to the north and west, the Waitangi River to the south, and the coastline of the inner Te Ti Bay to the east (refer to **Figure 1** in the Appendix to my evidence). I have characterised the Estate into eight landscape character areas based on a commonality of topography, vegetation types and patterns and land use.
- 6.3 I have adopted the definition of landscape character as described in Te Tangi a te Manu (NZ Landscape Guidelines)³, where landscape character is each landscape's distinct combination of physical, associative, and perceptual attributes. A landscape's character comprises:
- (a) both tangible and intangible attributes ('characteristics and qualities');
 - (b) the attributes in combination (as a whole); and
 - (c) especially the combination that makes a place distinct.
- 6.4 Landscape character is more than its physical elements. Character encompasses everything about a landscape: its physical, associative, and perceptual dimensions.
- 6.5 These eight character areas are described below and depicted in **Figure 2** in the Appendix to my evidence:
- (a) **Bay coastal character area:** Located within the northeast corner of the Estate, this character area is defined and contained on its western, southwestern and southern sides by landform. Tau Henare Drive traces a section of the western character area boundary ridge crest and allows spectacular views across Te Ti Bay to the north and east. Conversely, the steep ridge flanks and ridge crest form a sensitive backdrop to views from the water.
- While the upper ridge flanks are under pasture and the roofs of built development associated with the golf course are visible, when peeking over the ridge, the vegetated lower slopes and the bush-

² The Estate comprises Lots 1, 2 & 3 DP 326610, Lots 1 & 2 DP 152502, Lot 3 DP 51155, Sec 6 – 11, 15 & 16 SO 338905.

³ Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines', Tuia Pito Ora New Zealand Institute of Landscape Architects, July 2022. P105.

clad eastern slope of Hobson Hill lend this character area a natural appearance that is uncluttered by built form.

The visual catchment of this character area comprises the coastal marine area (**CMA**) within Wairoa Bay and the wider inner Bay of Islands to the north, northeast and east. It also includes terrestrial locations to the north of Wairoa Bay and views from Tau Henare Drive (and the adjoining golf course) and Bayly Road.

- (b) **Treaty Grounds character area:** This character area occupies a broadly rounded headland with narrow coastal reefs that project subtly from the northern mouth of the Waitangi River and is topped by a very gently undulating crest that runs over to the mid reaches of the River.

This character area is generally visually contained within a robust structure of vegetation (mature kanuka shrubland, with pockets of puriri, totara, taraire and kohekohe), such that views from the west north and north west are restricted to its edges. Visually exposed on its eastern (coastal) edge, with the catchment encompassing Russell, Paihia, and the intervening seascape. Limited views into this character area are afforded from the golf course to the north and northwest, from Tau Henare Drive to the west, and from the Copthorne Hotel site to the south.

Within this generally natural framework, manicured lawns, amenity plantings and buildings impart a modified and parkland / built character.

Further, the function of the Treaty Grounds as a national visitor attraction inevitably results in a level of pedestrian activity that diminishes a sense of wildness or remoteness.

This character area encompasses one of New Zealand's most important cultural landscapes and accommodates a number of heritage features associated with the signing of Te Tiriti o Waitangi / the Treaty of Waitangi in 1840.

- (c) **Coastal built character area:** Adjoining the Treaty Grounds character area on its southern side, the Coastal built character area occupies the same landform as described above, and shares a similar coastal character as its northerly neighbour. Small in area,

this character area is confined to a narrow and low-lying peninsula that shelters the northern side of the Waitangi River mouth.

On its western edge, this character area adjoins Tau Henare Drive and its western half is dominated by buildings within, and car parks associated with the Copthorne Hotel and Resort Bay of Islands. On its eastern edge, the buildings are separated from the foreshore by a manicured lawn and a row of large phoenix palms. The contrast between the vegetated character of the Treaty Grounds, which imparts an indigenous character, and the eastern 'face' of the Coastal built character area, which is relatively open and 'exotic' in its vegetative character, is marked.

The southwestern edge of this character area contains the northern entrance to the Waitangi River is vegetated with scattered small specimen pohutukawa. These trees soften the appearance of the built form and areas of car parks on this river edge that are visible both from the water and from Te Karuwha Parade and the road bridge.

Located at the southern tip of the peninsula are the club rooms and boat and car parks of the Bay of Islands Yacht Club. The visual catchment associated with this character area is similar in extent to that described for the Treaty Grounds character area, but also includes the Waitangi River and road bridge to the south, and the northern part of Paihia (Te Ti Bay) to the southeast.

- (d) **Ridge (Recreation) character area:** This character area borders the Treaty Grounds character area on its northern and western sides, and its eastern end straddles an easterly trending that bisects the northern part of the Estate (and forms the northern edge of the Hutia Creek catchment). At its eastern end, the ridge crest is some 20-30 metres in height with moderately steep flanks that slope down to the Waitangi River to the west and south west, and to Te Ti Bay on the east.

The topographical character of this character area is identical to the Ridge (Pastoral) character area to the west (described below), but is differentiated from that character area by its recreation (golf course) land use and consequent vegetative character. This area displays a parkland character with scattered specimen native trees, groups of

native trees, and some isolated forest remnants. Built development within this character area is limited, with the golf course club rooms being the principal feature. These are located close to the ridge crest within the north western part of this character area.

Given the elevation and relative openness of the majority of this character area, it tends to be visually exposed to the wider landscape, particularly with respect to the visual catchment to the east. Notwithstanding this visual exposure, the western flanks of the ridge are more visually contained.

- (e) **Ridge (Pastoral) character area:** Lying to the west of and adjoining the Ridge (Recreation) character area, this character area shares a commonality with respect to its topographical character and degree of visibility from the wider landscape. This character area is bisected by a spine ridge that is traced by Haruru Falls Road and rises to a height of some 70 meters at its highest point (this being Hobson Hill in the northeastern corner).

The character area is almost exclusively under pasture, with vegetation confined to the lower ridge flanks. As with the Ridge (Recreation) character area, lower lying portions of this character area (on the southern ridge flank) tend to be less visible from the wider visual catchment.

- (f) **Estuarine coastal character area:** This character area encompasses the estuarine coastal margins of the Estate and adjoins the Ridge (Recreation), Ridge (Pastoral), and Southern pastoral ridge character areas. The riparian margins slope steeply to the river and tend to be densely vegetated with native forest.

The character area also includes the majority of the catchment of the Hutia Creek, defined on its northern edge by the spine ridge that is traced by Haruru Falls Road. The ridge rises to a height of some 110 meters. With the exception of isolated pockets of exotic forestry, this character area is vegetated with native forest and displays high levels of naturalness.

The visual catchment is confined by the Hutia Creek and Waitangi River where these estuarine waterbodies adjoin this character area, or from the river to the east at its mouth. Views are also possible

from the Haruru Falls settlement, where dwellings afford views to the river edges. The Haruru Falls Track traces the northern edges of the Waitangi River from Waitangi to Haruru Falls. This popular pedestrian linkage offers immediate views of the river and creek margins within this character area.

- (g) **Southern pastoral ridge character area:** This character area displays a commonality of character with the Ridge (Pastoral) character area. It comprises an undulating easterly trending ridge that rises to a height of around 80 meters, with moderate to steep pastured flanks. The ridge forms a rural backdrop to views from the Haruru Falls settlement to the south and south west, and contains the catchment of the Hutia Creek.

The visual catchment associated with this character area is similar to that described above for the Ridge (Pastoral) character area and is visible from an extensive eastern, southeastern, southern and southwestern visual catchment that includes the Waitangi River, the Haruru Falls settlement, and locations along Puketona Road. In addition, proximate views are afforded from Haruru Falls Road where it traces the northern and western edges of this character area.

A small portion of the Estate is located on the western side of Haruru Falls Road in its south western corner. This area is visible both from the road and from a number of nearby rural residential properties. The northern and northeastern parts of this character area are visible from Hutia Creek and the Haruru Falls Track.

- (h) **Haruru Falls rural residential character area:** In the south west corner of the Waitangi Estate, the Bledisloe Domain contains club rooms and a sports field that cut into the sloping landform. These are served by an area of car parks. This low-lying and gently rolling landscape is spatially associated with rural residential settlement at the southern end of Haruru Falls Road. The nearby rural residential development and pony club facilities lend this area a more 'inhabited' character than the elevated and pastured ridge to the east. The visual catchment of this character area is confined principally to the road corridor and the landscape to the west of the

road that is constrained by vegetation growing along the riparian margin of the Haruru River.

- 6.6 The landscape values and consequent sensitivity of these character areas varies. This is a consequence of the intrinsic landscape values associated with each character area and/or the degree of visual exposure within the wider landscape.
- 6.7 In order to understand the effects of the changes anticipated by the Proposed Plan (as notified) and the Waitangi Estate Special Purpose Zone proposal, it is necessary to consider the value of the landscape, its sensitivity to change, and how this relates to the wider landscape character of the relevant areas.
- 6.8 In considering the Proposed Plan provisions and Waitangi Estate Special Purpose Zone proposal, I assessed the landscape values of the Estate⁴, and determined the visual 'exposure' of the character areas.
- 6.9 The landscape values of the Estate were determined through analysis of its physical, associative and perceptual attributes. This analysis included the consideration of previous landscape assessments, including the Far North District Landscape Assessment⁵ and the more recent Northland Mapping Project,⁶ as well as the natural character overlays identified in the Proposed Plan (which mirror the Northland Regional Policy Statement), and the Kerikeri Protected Natural Areas Surveillance Report⁷.
- 6.10 My assessment of the landscape sensitivity / values of the Estate is visually represented as **Figure 3** of the Appendix to my evidence.
- 6.11 The sensitivity of each of the character areas is mapped as either 'High', 'Medium' or 'Low'.
- 6.12 Appendix 5, attached to my Assessment of landscape effects, contains a table (identified as *Table 5. Sensitivity Area key assessment attributes*), which summarises the values and sensitivities of each of the character areas.

⁴ Above n1, section 4.

⁵ LA4 Landscape Architects. Far North District Landscape Assessment. 1995.

⁶ Littoralis Landscape Architecture and Simon Cocker Landscape Architecture. *Northland Mapping Project*. Northland Regional Council. February 2014.

⁷ Linda Conning and Nigel Miller. *Natural areas of Kerikeri Ecological District : reconnaissance survey report for the Protected Natural Areas Programme*. Dept. of Conservation (Northland Conservancy), 1999.

- 6.13 This information was used to inform the development of draft provisions for the Waitangi Estate Special Purpose Zone proposal (appended at Appendix L of the s32AA report). The sensitivity maps are referenced in the proposed assessment criteria for WEZ R-1.
- 6.14 Section 5 of my Assessment of landscape effects describes the proposed sub-zones for the Waitangi Estate Special Purpose Zone proposal. The sub-zones – mapped in **Figure 4** of the Appendix to my evidence – reflect the prevailing land use, but by virtue of that land use, tend to display a commonality in terms of their sensitivities and values, particularly in relation to the smaller sub-zones, such as the Te Pitowhenua (Treaty Grounds) sub-zone and Whakanga (Tourism) sub-zone.
- 6.15 The Papa Rehia (Recreation) sub-zone and Aruwhenua (General Activities) sub-zone encompass a wider variety of landscapes and display a mosaic of sensitivities and values as mapped in **Figure 3** of the Appendix to my evidence, and distilled in *Table 5. Sensitivity Area key assessment attributes*.
- 6.16 Further, in section 5, I have recommended assessment criteria for the Te Pitowhenua (Treaty Grounds), Whakanga (Tourism), Papa Rehia (Recreation) and Aruwhenua (General Activities) sub-zones. The criteria have been derived from the values and sensitivities identified in Table 5.

7. WHY I SUPPORT THE PROPOSED WAITANGI ESTATE SPECIAL PURPOSE ZONE

- 7.1 As described above, a special purpose zone has been proposed by Ms Jacobs for the Estate as an alternative to the framework provided in the Proposed Plan.
- 7.2 As described previously, I have mapped and evaluated the values of the Waitangi Estate and, in conjunction with Ms Jacobs, determined the extent of the sub-zones and confirmed the values associated with each.
- 7.3 Based on this information, I have assisted with the development of the provisions for the sub-zones, and made recommendations for assessment criteria.
- 7.4 I have reviewed the Waitangi Estate Special Purpose Zone provisions, and I consider that the proposed special purpose zone is an appropriate tool to

protect the ranging landscape values and sensitivities throughout the Estate.

7.5 This is because:

- (a) under the Waitangi Estate Special Purpose Zone, rules applying to the Estate 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. The Estate is a site like no other in the Far North District and will benefit from bespoke provisions that can protect the varying landscape values and sensitivities throughout the site;
- (b) the Waitangi Estate Special Purpose Zone has been designed to accommodate the spatial variations in landscape values and sensitivities across the site, rather than requiring the majority of the 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 Proposed Plan), while a more permissive approach can be applied to provide for areas with lower sensitivities (such as LSA12 – refer to **Figure 2** – which, located within the Ridge Recreation character area, is both modified and afforded limited visibility due to its elevation and containment);
- (c) the Waitangi Estate Special Purpose Zone 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; and
- (d) the Waitangi Estate Special Purpose Zone takes 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. These activities include temporary events of some scale such as the bicentenary events discussed in Mr Dalton's evidence for hearing four. The

Waitangi Estate Special Purpose Zone provides a more flexible statutory framework for the Estate, which takes into account landscape and natural character values.

- 7.6 In my view, the objectives, policies and rules developed for the Waitangi Estate Special Purpose Zone better reflect the varying land uses and environs throughout the Estate and will ensure that the future management and development of the Estate provides superior environmental planning outcomes with respect to sustainable management and protection of nationally significant historic heritage.
- 7.7 The overlays in the Proposed Plan will – under the Waitangi Estate Special Purpose Zone – still continue to apply, but with minor amendments to some overlay provisions.
- 7.8 Minor amendments have been proposed under NATC-R1 (to include Te Pitowhenua (Treaty Grounds) and Papa Rehia (Recreation) sub-zones), NFL-R1 (where the activity status for the Te Pitowhenua (Treaty Grounds) sub-zone has been modified to be a discretionary activity), and CE-R1 (in which the update seeks consistency with the National Planning Standards).
- 7.9 In my opinion, under the Proposed Plan, there is the potential for adverse effects arising from activities within the Estate to adversely affect the values of the Treaty Grounds. For example, MUZ-O1 focuses on the commercial importance of the part of the Estate that includes the Copthorne Hotel with little regard for potential adverse effects that such activities may have on the immediately adjacent Treaty Grounds, and the visitor amenity associated with that site. The Waitangi Estate Special Purpose Zone requires the consideration of such effects (WEZ-O1, WEZ-O2, WEZ-P1 and WEZ-P2). Under WEZ-P2, all other land use activities are to remain subservient in terms of how they impact the values associated with this part of the Estate.
- 7.10 I have made recommendations on the provisions for the Waitangi Estate Special Purpose Zone and, overall, I consider that the proposed provisions will appropriately protect landscape values and sensitivities at the Estate.
- 7.11 My recommendations have specifically sought to ensure that the sensitivities and values, mapped and identified within the Estate, are recognised and protected through the inclusion of appropriate standards and assessment criteria.

- 7.12 Specifically, these recommendations have included the standards addressing building coverage, heights, and exterior colours, earthworks and vegetation clearance. Where applicable, I have also drafted recommended assessment criteria for each of the character areas (as included in section 5 of my Assessment of landscape effects).
- 7.13 It is my understanding that Ms Jacobs has, where applicable, adopted the themes of my recommended assessment criteria and incorporated these into the Waitangi Estate Special Purpose Zone proposal with wording that is consistent with the assessment criteria contained in the Proposed Plan. I consider this to be acceptable.

8. POST-HEARING FOUR POSITION ON PROPOSED PLAN PROVISIONS

- 8.1 As explained in Waitangi Limited's submission, the primary relief sought by it is for the application of a special purpose zoning (or a precinct of similar effect) to the Estate.
- 8.2 In my evidence for hearing four, I responded to matters relating to Waitangi Limited's secondary 'fall-back' relief as it relates to landscape effects, and provided some commentary on provisions that could apply to a special purpose zone for the Estate. I provide an updated response on these provisions below:
- (a) Permitted building size: For the Treaty Grounds (Te Pitowhenua sub-zone), Waitangi Limited are seeking a more restrictive control of buildings of 30m².
 - (b) Height restrictions for buildings or structures: Previously, I agreed with the opinion of Ms Absolum (Council's consultant landscape architect) where she recommended that a 5m height control apply within the Coastal Environment. I qualified my opinion stating that, in other less visually sensitive locations (such as the Copthorne site zoned as Mixed Use), the height control should be less restrictive. This was reflected in Ms Absolum's response where a more permissive standard was enabled for this particular site.
 - (c) Colour scheme requirements NFL-S2: I recommended changes to the wording of this rule. These suggested changes were adopted such that they achieve the outcome sought in the submission.

- (d) Earthworks and Indigenous Vegetation Clearance CE-S3: In my evidence, I accepted the Council officer's recommendation where it applied to the wider District, but opined that my assessment of the landscape values and sensitivities would enable a 'finer grained' approach to prescribing controls on earthworks and vegetation clearance as part of a special purpose zone for the Estate.
- 8.3 The Proposed Plan approach to the management of subdivision and land use activities on the Estate is to apply a combination of general land use zones, district-wide standards, and area specific overlays that are derived from the National Planning Standards.
- 8.4 The Waitangi Estate Special Purpose zone, as proposed, aligns with the requirements set out in the National Planning Standards, as detailed in the evidence of Ms Jacobs.
- 8.5 Under the Waitangi Estate Special Purpose zone, the proposed district-wide environment overlays and general provisions will continue to apply, although some of these standards will either need minor amendments or require consequential amendments to include a reference to the Waitangi Estate Special Purpose zone.
- 8.6 With respect to the permitted building size, the Waitangi Estate Special Purpose zone aligns with the Proposed Plan, except with regard to the Te Pitowhenua sub-zone where – as noted above – an additional permitted standard has been added for a minimum building size within the area of Outstanding Natural Landscape.
- 8.7 Generally, it is my opinion that the proposed Waitangi Estate Special Purpose zone provisions, and amendments to district-wide standards, align with the outcomes expressed in the higher order documents where these apply to my area of expertise.

Simon Cocker

20 May 2025

APPENDIX: FIGURES DEPICTING THE ESTATE