

Before Kaipara District Council

In the Matter

of the Resource Management Act 1991 (**RMA**)

And

In the Matter

of an application for Private Plan Change 82
(**PC82**) by **MOONLIGHT HEIGHTS LIMITED** to
rezone 39.2 ha of land at Awakino Road,
Dargaville from Rural Zone to Residential Zone

Evidence of Ian Hanmore on behalf of Moonlight Heights Limited

(Highly Productive Land)

20 July 2023

Jeremy Brabant

Barrister

Foundry Chambers

Level 4, Vulcan Buildings

PO Box 1502, Shortland St

Auckland City

021 494 506

Email: jeremy@brabant.co.nz

Introduction

1. My full name is Ian Charles Hanmore. I am the director of Hanmore Land Management Limited a company specialising in land management and environmental consultancy. I hold a Master of Applied Science majoring in Natural Resource Management from Massey University, I am an approved competent mapper for the National Environmental Standards for Plantation Forestry Erosion Susceptible Classification with MPI, I have an Advanced Nutrient Management Certificate from Massey University and am a member of the New Zealand Association of Resource Managers, the New Zealand Institute of Primary Industry Management and the New Zealand Society of Soil Science.
2. I have 17 years' experience as a land and environmental management consultant and have worked extensively throughout Northland, Auckland and Waikato as well as a number of other regions around New Zealand. As part of my work I carry out soil and Land Use Capability (LUC) mapping. This work involves detailed soil and LUC surveys to map soils suitable for horticultural and specific horticultural crops, to identify prime, elite, high class and highly versatile soils and highly productive land in regard to subdivisions and land use consents, assisting farmers matching their production policy to their land resource, identifying land use development opportunities and enterprise diversification.
3. I was instructed by Barker and Associates in June to carry out LUC and soil mapping of part of the site at Awakino Road to determine if there was any Highly Productive Land (HPL) at the site. I am familiar with the area to which the application for resource consent relates. I have visited the site on one occasion on the 14th June 2023 and spent a number of hours there.
4. Although this is not a hearing before the Environment Court, I record that I have read and agree to and abide by the Environment Court's Code of Conduct for Expert Witnesses as specified in the Environment Court's Practice Note 2023. This evidence is within my area of expertise, except where I state that I rely upon the evidence of other expert witnesses as

presented to this hearing. I have not omitted to consider any material facts known to me that might alter or detract from the opinions expressed.

Scope of Evidence

5. My evidence will address the following:
 - a. The Highly Productive Land classifications
 - b. The s42A report
6. My evidence covers a description of the site, mapping method used, the soil types and LUC classifications at the proposed site and the subsequent HPL classifications.

Site Description

7. The site mapped at Awakino Road covers approximately 18.4 hectares. It is dominated by a flat alluvial terrace which covers approximately two thirds of the site with the remaining third being strong rolling to moderately steep slopes forming the terrace edges.
8. The site includes two farm buildings and is currently used to graze cattle.

Mapping Methodology

9. The site of interest was mapped at a scale of 1:5,000.
10. LUC mapping was carried out in accordance with the methods described in the 3rd Edition of the Land Use Capability Survey Handbook (Lynn et al 2009). This process involves making a land resource inventory (LRI) of the property in which soil types, soil parent materials, land slopes, erosion type and severity and land cover are recorded. Whenever any of these land features changes a new unit is made.
11. Over 35 soil profile observations were made as part of the mapping process.

Soil Types Identified

12. Three soil types were identified at the site, Kara silt loam, Okaka clay and silt loam, Kaipara clay.
13. Kara silt loam was present across the alluvial terrace that covers approximately two thirds of the site.
14. Okaka clay was present on the strong rolling to moderately steep slopes of the terrace edges.
15. A very small area of Kaipara clay was present in a wet depression on the eastern boundary.

Land Use Capability Classifications

16. Three LUC classification were made on the site, 4w 1, 4s 4 and 6e 7.
17. The area of LUC classification 4w 1 covers <0.01ha and includes Kaipara clay soil on flat to undulating areas (0-7⁰) on floodplains, valley plains and low terraces with severe continuing wetness or flooding limitation.
18. The area of LUC classification 4s 4 covers 11.71ha and includes Kara silt loam soil on flat to undulating slopes (0-15⁰) within a subdued rolling landscape with podzols and podzolised brown soils.
19. The area of LUC classification 6e 7 covers 5.88ha and includes Okaka clay soil on strong rolling to moderately steep slopes (16-25⁰) forming hilly terrain formed on shattered and sheared argillite complexed with sandstone and bedded mudstone.
20. The remaining area of the site is part of an accessway through the property and has no productive use and therefore has no LUC classification.

Highly Productive Land Classifications

21. The National Policy Statement for Highly Productive Land (NPS-HPL) came into effect in October 2022. This policy seeks to protect the productivity

potential of our most productive land by regulating non-productive land uses and inappropriate subdivision. The policy statement identifies all land in LUC classes 1, 2 and 3 as highly productive land.

22. The following definition is taken from section 1.3, page 4 of the NPS-HPL: *LUC 1, 2, or 3 land means land identified as Land Use Capability Class 1, 2, or 3, as mapped by the New Zealand Land Resource Inventory or by any more detailed mapping that uses the Land Use Capability classification.*
23. Based on the HPL definition in the NPS there is no HPL present on the site mapped as the LUC classifications are either class 4 or class 6 or the land is unproductive.

Response to s 42A Report

24. With reference to the understanding summarised in paragraph 69 with respect to a site-specific assessment and the likely outcome, I confirm the site-specific soil mapping has been completed and demonstrates that there is no LUC class 3 land on the site.
25. The area shown by the New Zealand Land Resource Inventory (NZLRI) as class 3 land is in fact part of the strong rolling to moderately steep slopes forming the terrace edges at the eastern end of the site. It is not part of the lower alluvial flats with Kaipara soils indicated by the NZLRI LUC class 3 classification.
26. The reference in paragraph 69 to LUC maps from the NZLRI being prepared at a very high scale is correct. The NZLRI is mapped at a scale of 1:50,000 and is meant for use at a regional scale not a farm scale. It is this difference in scale that has contributed to the incorrect placement of the LUC class 3 boundary.

Response to Submitters

27. Submissions lodged on the plan change do not address the LUC class of the land subject to the plan change application.

Conclusion

28. There is only unproductive and LUC class 4 and 6 land on the proposed site all of which is outside of the HPL category.
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Reference

Lynn IH, Manderson AK, Page MJ, Harmsworth GR, Eyles GO, Douglas GB, Mackay AD, Newsome PJF 2009. NZ Land Use Capability Survey Handbook – a New Zealand handbook for the classification of land 3rd Edition. Hamilton, AgResearch; Lincoln, Landcare Research; Lower Hutt, GNS Science.

Ian Hanmore

20 July 2023