BEFORE THE KAIPARA DISTRICT COUNCIL'S HEARING PANEL

IN THE MATTER OF	the Resource Management Act 1991 (**the Act**)
AND	
IN THE MATTER	An application for Private Plan Change 85 (**PC85**) - **MANGAWHAI EAST** by Foundry Group Limited (formerly Cabra Mangawhai Limited) and Pro Land Matters Company to rezone approximately 94-hectares of land at Black Swamp and Raymond Bull Roads, Mangawhai

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STATEMENT OF EVIDENCE OF JEREMY BRYCE HUNT ON BEHALF OF THE APPLICANTS

(Rural Productivity)

16 December 2025

Jeremy Brabant

Barrister

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INTRODUCTION

1. My full name is Jeremy Bryce Hunt.

2. I have been asked by Foundry Group Limited (formerly Cabra Mangawhai Limited) and Pro Land Matters Company (**The Applicant**) to provide independent expert advice regarding an application for Private Plan Change 85 (**PC85**) under the Operative Kaipara District Plan 2013.

3. The PC85 seeks to re-zone approximately 94 hectares of rural zoned land, within the Mangawhai Harbour overlay to a mix of residential, commercial and rural lifestyle zoned land.

4. Due to the current Rural zoning and a portion of the soils being mapped as Land Use Capability (**LUC**) 3, an assessment against the National Policy Statement for Highly Productive Land (**NPS-HPL**) is required.

QUALIFICATIONS AND EXPERIENCE

5. I am an Agribusiness Consultant at AgFirst Waikato (2016) Limited (**AgFirst Waikato**) in Hamilton, a role I have had for approximately 7 years. I have been a Director of AgFirst Waikato since 2020. My key focus area is land resource management including highly productive land and rural productivity assessments.

6. I hold a Bachelor's degree in Environmental Science obtained in 2004 from the University of Canterbury. I have completed the intermediate and advanced sustainable nutrient management and advanced soil conservation papers at Massey University. I also have a Land Use Capability Mapping Workshop Certificate. I am a member of the Institute of Rural Professionals (**IRP**) – formally New Zealand Institute of Primary Industry Management (**NZIPIM**), an independent industry body for the farm advisory and rural profession.

7. I have been involved in District Council and Environment Court hearings as well as Mediation and Expert Witness Conferencing for assessments against the NPS-HPL, particularly relating to Clause 3.6 and 3.10.

8. I have been involved in many due diligence assessments for land use change and was an author of the Our Land and Water – Barriers to Diversification Report.

9. The core focus of my experience relates to land and resource management. The nature of my work leads me to work across a wide range of issues in the primary sector and land use assessments.

EXPERT WITNESS CODE OF CONDUCT

10. 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.

PROJECT INVOLVEMENT

11. I was engaged to undertake the rural productivity assessment for PC85 under Clause 3.6 and 3.10 of the NPS-HPL.

12. Two separate reports were provided by AgFirst relating to the NPS-HPL, whereby I was the reviewer and approved these for release.

13. AgFirst consultants visited the Site on 14 March 2025 for a productive capacity assessment.

SCOPE OF EVIDENCE

14. This evidence has been prepared on behalf of the applicants, who are seeking a Plan Change for an area of land of approximately 94 ha (**PC85 Site**). The PC85 Site is situated to the southeast of Mangawhai Village on the southern side of Mangawhai Harbour with the land bordering Black Swamp Road and Raymond Bull Road. The purpose of PC85, as stated at section 2.1 of the Planning report, is to provide development capacity and a choice of living options in the form of residential, commercial and rural lifestyle zoned land and to provide for a coordinated and efficient use of the land resource for Mangawhai East.

15. My evidence addresses the productive capacity of the PC85 Site and provides information relevant to an assessment against the NPS-HPL Clause 3.6(4), 3.6(5) and 3.10.

16. My evidence incudes a summary of each of the NPS-HPL assessments that I have undertaken:

    (a) Property summary and existing land use assessment.

    (b) Land and soil assessment that has been undertaken across the PC85 Site to inform productive capacity and constraints.

    (c) Land use potential for the PC85 Site.

    (d) Economic analysis based on the highest and best productive operations.

    (e) A comparison of the PC85 Site against other reasonably practicable and feasible options for urban expansion surrounding Mangawhai.

17. My evidence also responds to relevant parts of the s42A Report.

18. In the course of preparing this evidence I have considered:

    (a) The application lodged with Council on 12 December 2024.

    (b) The s42A report dated 1 December 2025.

    (c) Expert Evidence of Mr Cathcart (Highly Productive Land).

    (d) Draft expert Evidence of Mr Thompson (Economics).

    (e) Draft expert Evidence of Ms O'Connor (Planning).

    (f) Draft expert Evidence of Mr Hanmore (Soils).

19. My evidence is to be read in conjunction with the PC85 application and further information referred to above, and the evidence presented by the other experts.

20. There has been a minor change to the PC85 Structure Plan. I have made some comments on the impact these changes will have on productive capacity and my initial assessments.

NPS-HPL ASSESSMENT

Assessment of the Urban Rezoning Site (URZ Site)- Clause 3.6

21. I have assessed the proposal to rezone approximately 80.15 ha of the total approximately 94 ha PC85 Site, currently zoned rural land, southeast of Mangawhai Village for residential and commercial purposes. My assessment has focussed on the northern portion of PC85 and the two discrete areas of the southern portion of the land where there is mapped HPL adjacent to Black Swamp Road and the estuarine finger that extends parallel to Black Swamp Road, because this is the area that contains HPL. The URZ Site comprises 24 titles and is currently zoned Rural.

22. In undertaking my assessment against the NPS-HPL, I relied on both New Zealand Land Resource Inventory (**NZLRI**) mapping and detailed site-specific soil and LUC investigations – undertaken by Hanmore Land Management (**HLM**). While regional mapping identifies much of the URZ Site as LUC 3, and the HML site investigation and report found there was 54.8ha or 58.3% of LUC class 3 land in the PC85 area, my analysis confirms only 42.37 ha qualifies as HPL once actual soil conditions, drainage, and unproductive land are accounted for.[1] The variation in areas between the HLM Soil and Resource Report and AgFirst Report is due to AgFirst removing ineffective and non-productive areas, e.g. dwellings, curtilage, driveways, and the covenanted saltmarsh.

23. As detailed by Mr Hanmore in his Soil and Resource Report[2], the scale of the regional NZLRI soil mapping used to determine LUC and HPL was not designed for farm scale use. Additionally, Mr Hanmore discusses in his evidence[3] that the NPS-HPL - Clause 3.5 requires Regional Councils to map the soils no later than 3 years after the commencement date (deadline 17 October 2025).

24. The URZ Site is predominantly made up of lifestyle and residential lots, many containing dwellings, curtilage, and modified soils. Only limited areas are used for

[1] Mr Cathcart concludes at [5.20] "the total area of usable Class 3 and therefore highly productive land is less than 40 hectares and that is in irregular-shaped pieces dispersed across the area the whole 78ha, and on numerous titles"

[2] Hanmore, I. (2025). Addendum Report for the Cabra Soil and Resource Report, Mangawhai. Hanmore Land Management.

[3] Mr Hanmore Evidence - Paragraph 6

primary production, specifically small-scale drystock farming and an occasional/first time arable crop grown on poorly drained peat soils.

25. In my opinion, the URZ Site's productive potential is significantly constrained. Wetness, high water tables, slopes across the south of the URZ Site, saline and coastal influences, and extensive fragmentation of titles collectively prevent the land from supporting viable or scalable land-based primary production. There is also a protected wetland, holiday park, consented brewery and garden centre all within the PC85 Site, which are indicative of urban and residential type activities operating on Rural land. The holiday park in particular will be sensitive to many of the agricultural emissions and nuisance effects, with holiday makers wanting to relax.

26. I do not consider intensive uses such as horticulture, commercial vegetables, dairy or long-term arable systems to be reasonably practicable. Drystock farming represents the highest and best use, yet even this activity is uneconomic when realistic operating costs, rates, and debt-servicing assumptions are applied.

27. When weighing up the cost benefit analysis, I understand from the planning and economic evidence (which I rely on) that the rezoning will provide additional development capacity, contribute to housing supply and choice, and support a coherent urban form. The land was one of seven areas considered for urban growth in the Mangawhai Spatial Plan. The Spatial Plan determined that the land could be zoned for rural lifestyle development. I note that had this zoning occurred, then the NPS-HPL would not apply to the land because the NPS only applies for rural or general rural zoned land.

28. Given the impaired productive state of the land, these benefits are not offset by any meaningful long-term agricultural value. In my view, these urban, social and economic benefits are realised on land that is already poorly suited to land-based primary production.

29. The area of HPL affected by the rezoning is very small in the district context, representing approximately 0.127–0.193% of Kaipara's total HPL resource. Given the already highly fragmented and compromised state of the land, including the established urban land uses in the PC85 Site, I consider the productive loss to be minimal.

30. I have compared the URZ Site with three alternative potential urban expansion areas around Mangawhai. These are shown in Figure 3 of my evidence and in Appendix A, being the Northen Site, the Western Site and the Southern Site. In each case, those alternative areas contain larger, contiguous and more productive blocks with greater proportions of HPL. In my opinion, rezoning any of these alternatives would generate a materially greater loss of productive land than rezoning the URZ Site. All of these alternative assessment areas are referenced within the Mangawhai Spatial Plan, being undeveloped Rural areas that would provide capacity for urban growth.

31. Based on the constraints identified, the limited productive capacity of the land, and my comparison with alternative development locations, I consider that the proposal meets Clause 3.6(4)(b) and (c) of the NPS-HPL. In my view, the URZ Site is the least impactful location for urban expansion in terms of the protection of HPL. I also understand from my engagement with the planning and economic experts (Ms O'Connor and Thompson), that overall the environmental, social, and economic benefits of the rezoning sought outweigh the costs associated with the loss of HPL. There have been some minor amendments to the PC85 Structure Plan. An area of approximately 3.9 ha (consented brewery) that was previously assessed as part of RLZ Site is now being proposed for URZ. This area was previously tested against the provisions of Clause 3.10 which is a higher threshold. This area was determined to not be economically viable, therefore will have no impact on my overall assessment.

Assessment of the Rural Lifestyle Rezoning Site (RLZ Site)- Clause 3.10

32. I have assessed the proposal to rezone approximately 14.92 ha of rural land on the southern side of the Mangawhai Harbour for Rural Lifestyle purposes. The RLZ Site comprises four titles and is currently zoned Rural.

33. The RLZ Site is characterised by permanent and long-term constraints: very poor and saline soils, high water tables, coastal inundation risk, failed past attempts at viticulture, and significant non-reversible land fragmentation. Surrounding activities - including lifestyle blocks, a holiday park, harbour margins and a stream - further restricting any opportunity for amalgamation or expansion into a viable farming unit.

34. I have identified pastoral grazing as the highest and best productive use. However, economic modelling shows that even under an amalgamated 8 ha system, the

operation would not be considered economic. When realistic fixed costs are applied, each property's net result is a substantial loss.

35. None of the alternative reasonably practicable options required under Clause 3.10(2) - including alternative crops, improved management, horticulture, CVP, arable production, irrigation, amalgamation, or leasing - are capable of overcoming the permanent constraints or achieving long-term economic viability. Soil limitations, proximity to sensitive neighbours, capital requirements and the extremely small scale, make these options infeasible.

36. The rezoning will not cause significant loss of productive capacity in the Kaipara District. The effective HPL area (8.04 ha) represents only 0.024% of the district's HPL. The RLZ Site is already fragmented, constrained and unable to support commercial production. Rezoning therefore does not fragment any large or geographically contiguous HPL.

37. Environmental, social, cultural and economic benefits of rezoning outweigh the minimal productive losses. The RLZ Site already functions as rural lifestyle land, offers little agricultural employment or output, and carries high land values driven by amenity rather than agricultural potential. The proposed rezoning will realise the current land use, which is already lifestyle in nature.

38. In my opinion, the RLZ Site satisfies Clause 3.10 of the NPS-HPL. The land cannot be economically viable for land-based primary production for at least 30 years, and all reasonably practicable options have been exhausted. The rezoning will not significantly reduce district productive capacity, nor will it cause additional fragmentation or reverse sensitivity effects.

39. The Rural Lifestyle zoning is appropriate and consistent with the NPS-HPL framework, which is also recognised in the 2020 Mangawhai Spatial Plan.

40. As mentioned, there have been some minor amendments to the PC85 Structure Plan. An area of approximately 5.4 ha (Holiday Park and residential properties adjacent to the estuary) that were previously assessed as part of URZ Site is now being proposed for RLZ. There areas have been assessed as having no productive potential and permanent and long-term constraints. This area was previously included in the 3.6 assessment and was identified as having no HPL or potential return from production. Therefore, this area would not be economically viable for land-based primary

production for at least 30 years and would satisfy the tests against Clause 3.10 of the NPS-HPL.

S42A REPORT

Matters of Agreement

41. The S42A Report author and Mr Cathcart are in agreement with the majority of my assessment of the URZ Site (80.15 ha) that is proposed to be rezoned from Rural into Urban Zone. The following areas are in agreement:

    (a) Productive capacity for the URZ Site is limited to pastoral grazing and occasional arable cropping across some areas due to soil constraints, water availability and non-reversable land fragmentation.

    (b) A baseline economic analysis for the URZ Site indicates that land-based primary production is not economically viable.

    (c) Due to the very limited productive capacity, the benefits of rezoning will likely outweigh the costs associated from the loss of HPL.

    (d) Of the comparative alternative sites provided within my assessment for providing development capacity, the URZ Site is of a lower relative productive capacity.

42. The S42A Report author and Mr Cathcart are also in agreement with my assessment of the RLZ Site (14.92 ha) that is proposed to be rezoned from Rural into Rural Lifestyle Zone. Therefore, the RLZ Site meets the NPS-HPL Clause 3.10 provisions.

Matters of disagreement

43. The S42A author does not believe that the assessments undertaken for PC85 – URZ Site – satisfies all of the provisions of the NPS-HPL Clause 3.6. Much of these are outside my area of expertise and will be addressed in the planning and economic evidence of behalf of the Applicant. My evidence will focus on a comparison of the soils and productivity of the PC85 Site compared to other alternative development areas for consideration.

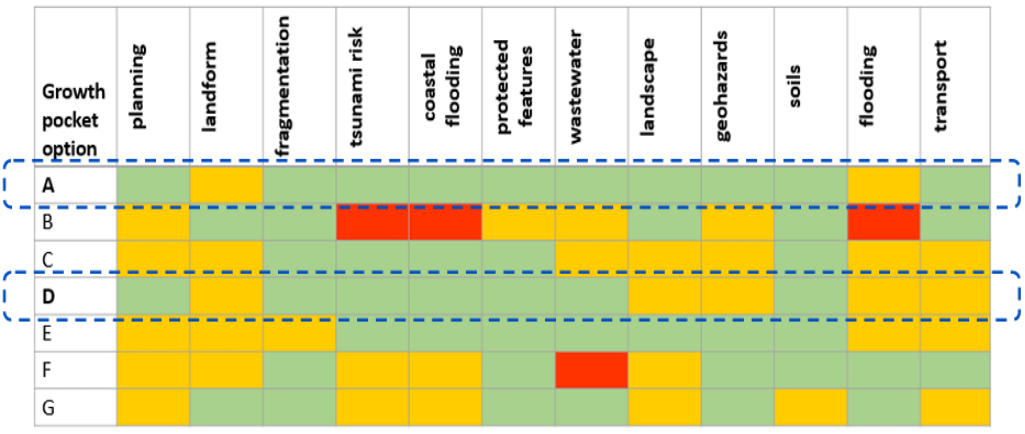
44. The S42A author has referenced the Mangawhai Spatial Plan for Kaipara District Council (**KDC**) undertaken in 2020. Appendix C of this Report includes a provisional residential growth area assessment. Clause 3.6(4)(b) requires consideration of "*other reasonably practicable and feasible options for providing the required development capacity*".

45. While the NPS-HPL does not specify the same locality, the S42A author highlights the separate requirements under the NPS-UD, regarding the need for any new urban growth areas to still deliver a well-functioning urban environment. They then conclude that the alternative locations cannot be fanciful locations or disconnected from the urban edge, i.e. they must be feasible and practicable alternatives.

46. Therefore, to strengthen the assessment for the URZ Site, I have included the alternative areas referenced in the Spatial Plan for urban development as a robust comparative analysis, on the basis that these areas were identified in the Spatial Plan (including part of the PC85 Site) and have been subject to community engagement.

47. The Table included in the Spatial Plan assessment is shown below (Table 1) and highlights the indicative preferred growth areas. Note that Area G is part of the PC85 Site. My analysis has also already considered Area F (Western Site). Additionally, Areas A, C and D are already subject to rezoning and are therefore no longer applicable. Therefore, additional areas to consider for my analysis is Area B and Area E.

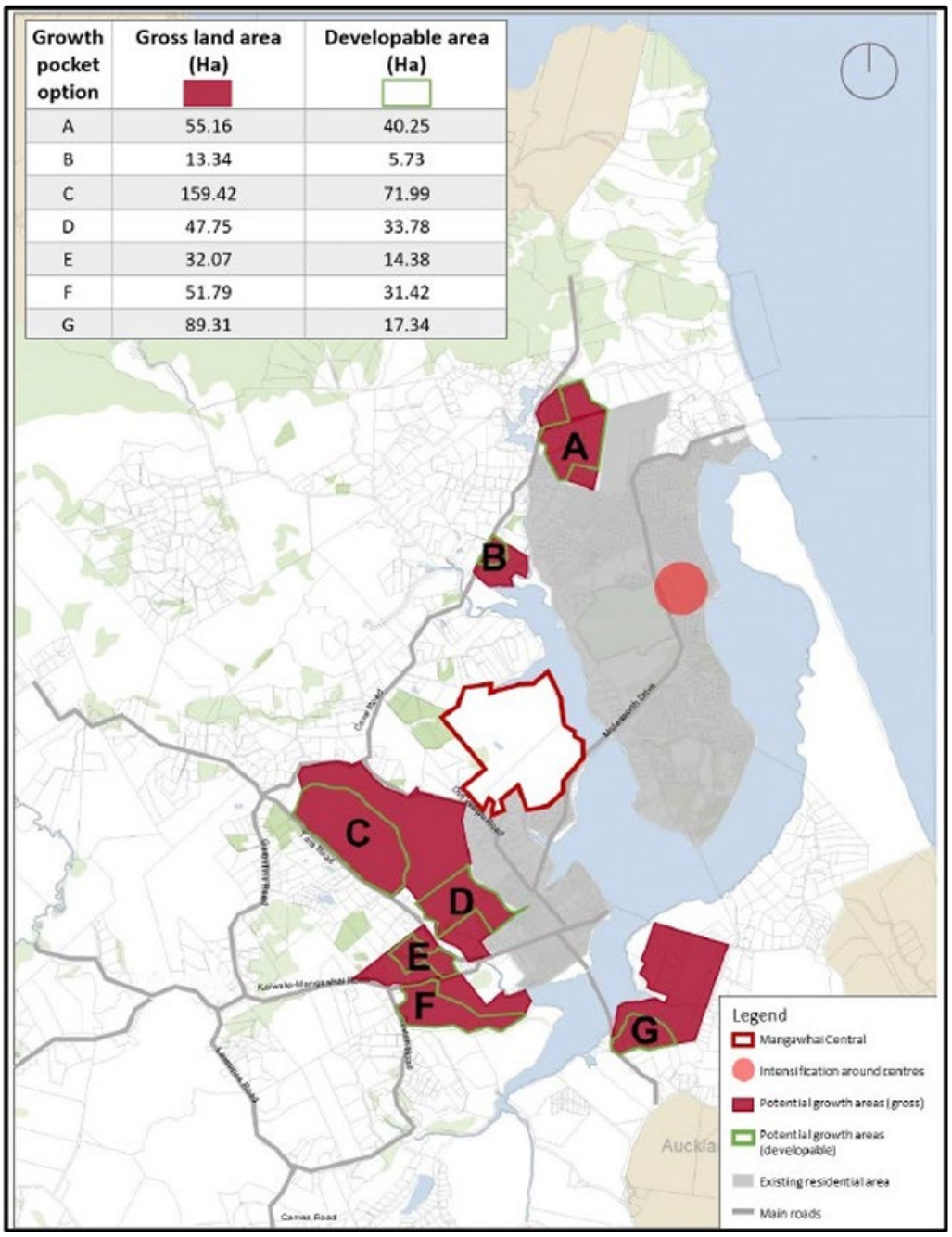
Table 1: Indicative assessment of preferred growth areas



Red = Least suitable
Yellow = Moderate, subject to technical improvement
Green = Most suitable

48. A map of the 2020 Mangawhai Spatial Plan is shown below in Figure 1.

Figure 1: Provisional Residential Growth Areas - Mangawhai Spatial Plan

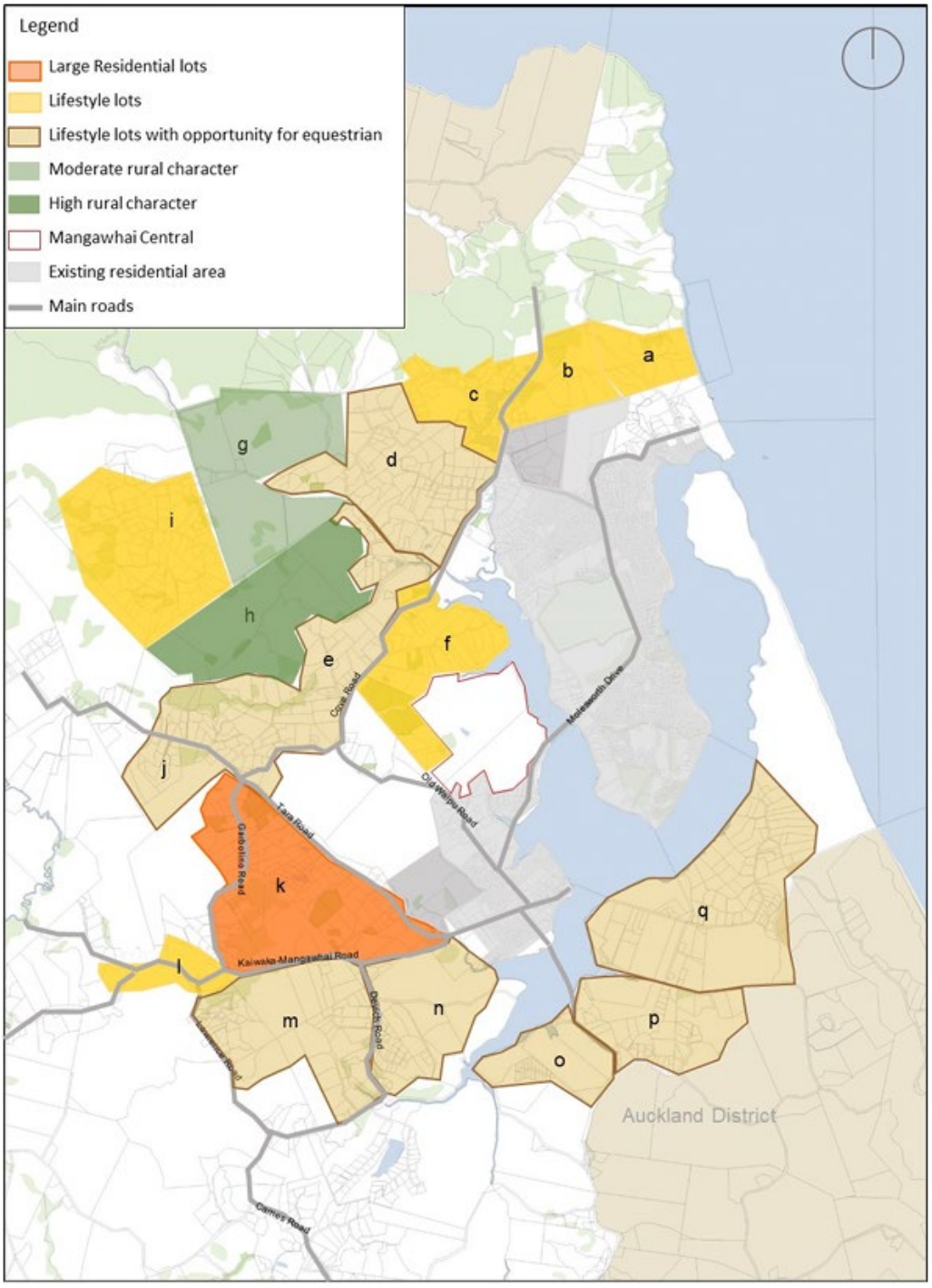


49. As part of the 2020 Spatial Plan, a provisional assessment of Rural-Residential Areas was also undertaken. An Excerpt from the Spatial Plan states:

> *"During the Spatial Plan process a provisional analysis of the existing rural subdivision pattern was undertaken by breaking the study area into 17 different areas and assessing their suitability for further subdivision and development."*

50. A map of the provisional detailed assessment of Rural-Residential Areas is shown below in Figure 2. The PC85 Site is identified as Area P and part of Area Q within this plan and is highlighted as an area for proposed lifestyle lot development. It should be noted that only Rural and General Rural Zoning are subject to the NPS-HPL, not Future Urban, Lifestyle Zones or any Council initiated, adopted or notified plans.

Figure 2: Provisional detailed assessment of Rural-Residential Areas - Mangawhai Spatial Plan



51. Therefore, the Mangawhai Spatial Plan and KDC have long identified the PC85 Site for non-rural production purposes. While the NPS-HPL was not in effect during the Spatial Plan analysis, there was consideration of the Northland Regional Council Regional Policy Statement (**NRC RPS**) for highly versatile soils. My assessment and the peer review undertaken by Mr Cathcart supports this conclusion, being that the PC85 Site is subject to significant productivity constraints, being soil limitations, non-reversable land fragmentation and the inability to consolidate and generate an economically viable farming business.

52. To compare the alternative sites, I have used the best information that has been available to me at the time. This information included the detailed site-specific soil mapping (Hanmore Land Management (HLM) report) for the PC85 Site and the NZLRI LUC classifications and NRC soils database for the alternative sites. To improve the accuracy, I have also overlaid the Lidar information, which is at a 1 m resolution. I believe that this is a fair and reasonable approach, and one that I have previously used for 3.6 assessments4.

53. With regards to the alternative sites, while it is important to consider the presence of HPL and the NZLRI LUC classification, the key metric is productive capacity.

54. Productive capacity is defined in the NPS HPL as:

> *"**Productive capacity**, in relation to land, means the ability of the land to support land-based primary production over the long term, based on an assessment of:*
>
> *(a) physical characteristics (such as soil type, properties, and versatility); and*
>
> *(b) legal constraints (such as consent notices, local authority covenants, and easements); and*
>
> *(c) the size and shape of existing and proposed land parcels"*

[4] Plan Change 20 – Airport Northern Precinct Extension (Waipa District Council).

55. While soil type and properties are included in the physical characteristics, the LUC classification is not the entire test of the comparison of the alternative sites.

56. In my analysis, I have assessed the alternative sites based on their productive capacity, and their ability to support land-based primary production.

57. There is case law[5] that says that more detailed mapping of soils does not prevail over the identification of land as LUC 1, 2, or 3, as mapped by the NZLRI, for the purposes of Clause 3.5(7) of the NPS-HPL whether land is HPL. Therefore, I have not relied on the HLM soil mapping for this purpose (i.e., reclassification), but rather to help determine the productive capacity of the Subject Site (for Clause 3.6(4)).

58. When assessing the highest and best use of land-based primary production (or optimised land use) of a property, we take into account a range of considerations. These include but are not limited to: site physical analysis; economic viability; market analysis; environmental and sustainability; labour and skillset considerations and legal and regulatory compliance.

59. Other tools were used to support the productive capacity assessment, such as the Lidar imagery, drone flights and land use considerations observations during the AgFirst site visit.

60. To understand the loss of productive capacity and economic cost associated with the loss of HPL, I have taken a broader approach. The LUC focuses on the biophysical capacity, not economics. For example, the LUC will tell you about the slope, soil characteristics, erosion risk, drainage and climate suitability, it does not tell us how much revenue or employment an area of land generates, or how valuable that production is to the economy.

61. Different tools (e.g. soil maps, historical imagery, land cover databases, farm performance and industry benchmarking) help quantify what is actually being produced. These allow us to connect the physical loss of HPL with changes in output, GDP contribution, export earnings and rural employment.

62. Using these together is critical to understand the full cost of losing highly productive land, rather than a single metric of LUC classification.

[5] *Blue Grass Ltd v Dunedin City Council* [2024] NZEnvC 83.

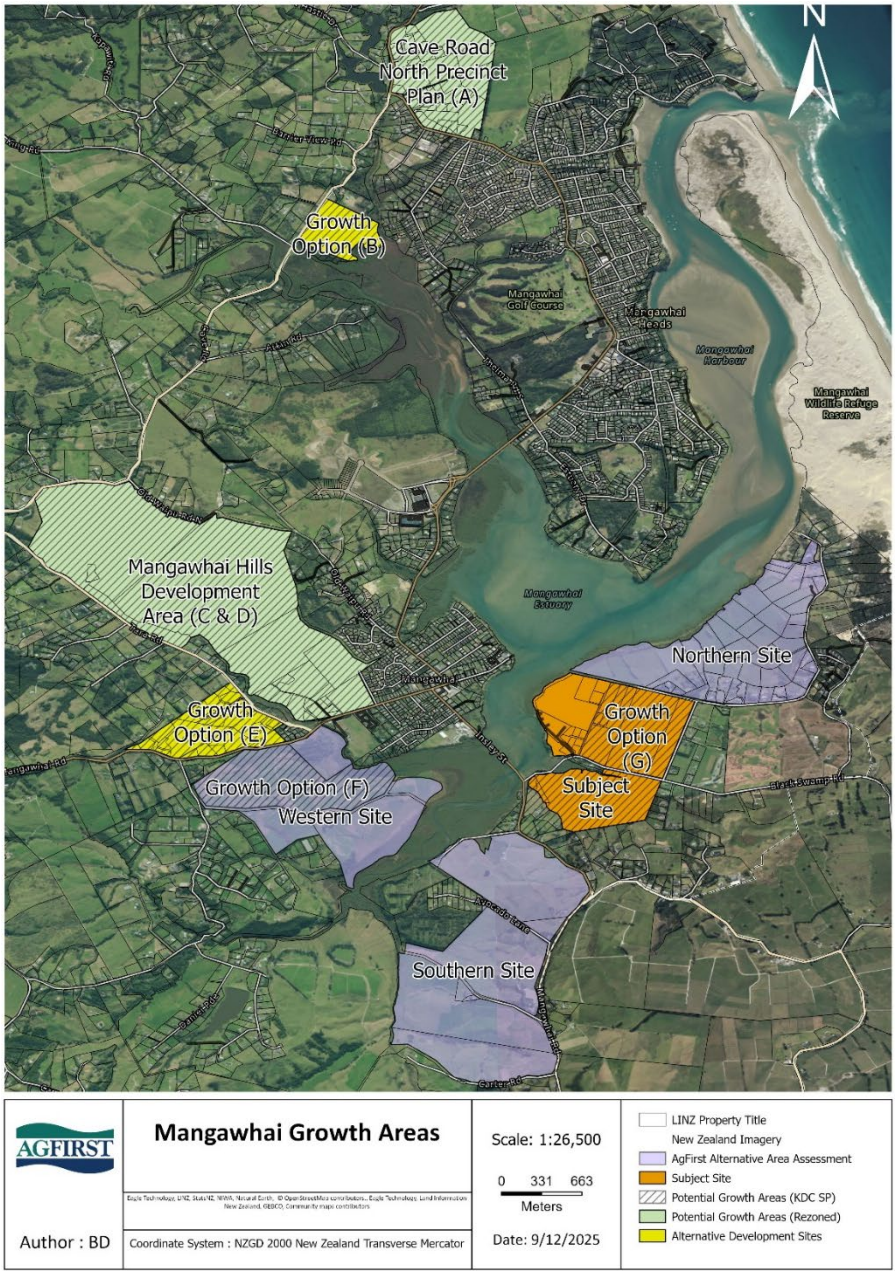
63. I have outlined the productive capacity of the alternative sites, but the determination of where to zone land is a more complex analysis than just productive capacity. This is just one of the relevant factors. It is up to the planners and economists to undertake the comprehensive weighting and analysis of all environmental, social, cultural and economic factors and to determine the arguments for achieving a well-functioning environment whilst providing sufficient development capacity to meet the demand.

ADDITIONAL ANALYSIS OF OTHER REASONABLY PRACTICABLE AND FEASIBLE OPTIONS

64. As mentioned, the S42A Report author has referenced the Mangawhai Spatial Plan, which contains areas that I had dismissed in my initial assessment. The reason for not including these was that they were not comparable in area to provide sufficient development capacity, as provided by Mr Thompson's analysis.

65. For completeness, I have expanded my analysis into these areas. I have presented a map depicting the wider Mangawhai area with a live planning overlay (Figure 3). This shows the locations of the relevant areas identified in the Spatial Plan. For this analysis I have relied on desktop tools available.

Figure 3: Mangawhai Spatial Plan with Live Planning Overlay



Soil and productive capacity comparison of Area B

66. Area B is Zoned Rural under the Kaipara District Plan (**KDP**)and has the ability to develop an estimated 5.7 ha out of a of total gross land area of 13.3 ha. It appears to currently be utilised as a small grazing block with one dwelling and expansive areas of vegetation. This area is largely dominated by an unidentified salt marsh along the coastal frontage. The extent of Area B is shown in Figure 4. Additional maps for Area B are included in **Appendix A.**

Figure 4: Area B - Assessment of alternative land for Urban development

67. I have reviewed the NZLRI LUC, NRC soil maps[6], soil factsheets[7] and LiDAR information for this area. In summary, it contains a mix of LUC 7w1 along the eastern boundary, with the bulk of developable area being LUC 4s4 and LUC 4w1.

[6] soiltypesmangawhaiwarkworth_uvn_1.pdf
[7] https://www.nrc.govt.nz/environment/land/our-soils/soil-factsheets/#M

68. The soils classified as LUC 4s4 within Area B correspond to the Kara silt loam (KR) described in the NRC Factsheets. These are imperfectly drained, very old podzol soils that are structurally weak, relatively thin, and susceptible to loss during cultivation. In my experience, effective management of these soils requires careful winter grazing to minimise pugging and compaction, the maintenance of adequate pasture cover to support soil organic matter, and cautious cultivation practices to avoid degrading soil structure when cropping or regrassing.

69. The LUC 4w1 soils as mapped are Mangakahia mottled clay loam (MFm). These are imperfectly to poorly drained recent alluvial soils occurring on floodplains. Although they are relatively fertile, they are prone to gleying and structural degradation as a result of periodic flooding. Both arable and pastoral uses on these soils require careful timing of grazing and cultivation to avoid compaction. In my view, subsurface drainage is unlikely to fully address the underlying wetness limitations associated with these soils.

70. The areas mapped as LUC 7w1 are along the east, which are largely unproductive extensive marshland and would also be unsuitable for urban development, given the coastal inundation.

71. Upon reviewing Google Earth Satellite imagery, the current form of land-based primary production appears to be a small-scale livestock grazing block. Historical imagery shows that in 2014 approximately 2.0 ha of the Site was in arable cropping. It is my opinion that due to the wetness limitations and small scale, that the highest and best use would be livestock grazing. It is highly unlikely that this property, as a stand-alone unit, would be economically viable. This is consistent with the parcels within the URZ Site, therefore of a similar productive capacity.

Soil and productive capacity comparison of Area E

72. Area E is Zoned Rural under the KDP and has approximately 14.4 ha of developable land out of a gross land area of 32.1 ha. I have estimated that the totality of Area E contains 30 separate titles, being dominated by lifestyle properties, with a small area of pastoral grazing land in the centre and west. The extent of Area B is shown in Figure 5. Additional maps for Area E are included in Appendix A.

Figure 5: Area E - Assessment of alternative land for Urban development

73. I have reviewed the NZLRI LUC, NRC soil maps, soil factsheets and LiDAR information for this area. In summary, it contains mostly LUC 4e5 across the productive areas, with small portion of LUC 6e1. The lifestyle properties are for the most located on LUC 4s4 and LUC 3e3 soils.

74. The soils mapped as LUC 4e5 are a Mahurangi fine sandy loam (MV). These are moderately to poorly drained old sandstone soils, that are strongly leached and naturally acidic. When reviewing the LiDAR slopes, Area E has a mix of contour, with small lowland flats to the east, with the remainder of the Site being rolling to strongly rolling, reflective of the mix of LUC units. These soils are often associated with winter wetness and pugging, with careful winter grazing management required.

75. In my opinion, Area E is significantly constrained due to non-reversable land fragmentation, productive capacity and commercial viability. I consider that many of the properties within the URZ Site share similar constraints to Area E.

CONCLUSION

76. The PC85 area comprises approximately 94 ha of rural-zoned land on the southern side of the Mangawhai Harbour. The Site contains a mixture of peat flats, podzolised sand soils, coastal marshland, rolling hill country and a highly fragmented pattern of lifestyle and residential development. Although the NZLRI maps much of the land as LUC 3, site-specific assessment confirms that only a portion of the wider PC85 area operates as genuinely productive land, with the balance constrained by wetness, salinity, slope, existing dwellings, curtilage and extensive anthropic modification. Across the PC85 Site, primary production is limited to small-scale drystock and occasional arable use on marginal, poorly drained soils.

77. For the URZ Site, I have assessed approximately 80.15 ha of land against Clause 3.6 of the NPS-HPL. While NZLRI mapping identifies most of this land as LUC 3, detailed analysis shows that only 42.37 ha performs as HPL. The remainder includes unproductive peat basins, marshland, steep slopes, saline margins, and fragmented lifestyle properties that cannot be feasibly amalgamated. In functional terms, the URZ Site's productive capacity is low and highly constrained.

78. The physical and economic characteristics of the URZ Site make it unsuitable for intensive or commercially viable agriculture. Wetness, high water tables, drainage limitations, coastal influence, slopes, and extensive fragmentation collectively prevent the formation of a viable farming unit. The highest and best use is low-intensity drystock grazing, yet this is uneconomic once realistic costs, rates and debt-servicing are applied. The long-term cost of rezoning the URZ Site is therefore minimal when considering the wider benefits.

79. To strengthen Clause 3.6(4)(b), I undertook a comparative analysis of the alternative expansion areas referenced in the Mangawhai Spatial Plan and the s42A Report, including Areas B and E. While these areas contain less HPL, they exhibit very similar constraints and productive capacity – being low intensive pastoral grazing.

80. Although some of the comparative areas contain areas used for land-based primary production, none represents a genuinely versatile or commercially scalable HPL resource. Each is limited to low-intensity pastoral use at best, and each faces long-term constraints that would restrict productivity irrespective of future management.

81. In my opinion, none of the additional areas assessed nor the URZ Site would result in a noticeable loss of productive capacity. All options involve similarly constrained land.

82. However, as I have acknowledged earlier in my evidence, productive capacity and HPL is only one component of the broader planning assessment. While I have evaluated the agricultural potential of the alternative sites, the ultimate determination of appropriate zoning requires consideration of wider planning and economic factors, including how development capacity and a well-functioning urban environment are best achieved and do they meet the reasonably practicable threshold.

JEREMY HUNT

16 December 2025

APPENDIX A: MAPS FOR ASSESSMENT OF ALTERNATIVE LAND FOR URBAN DEVELOPMENT

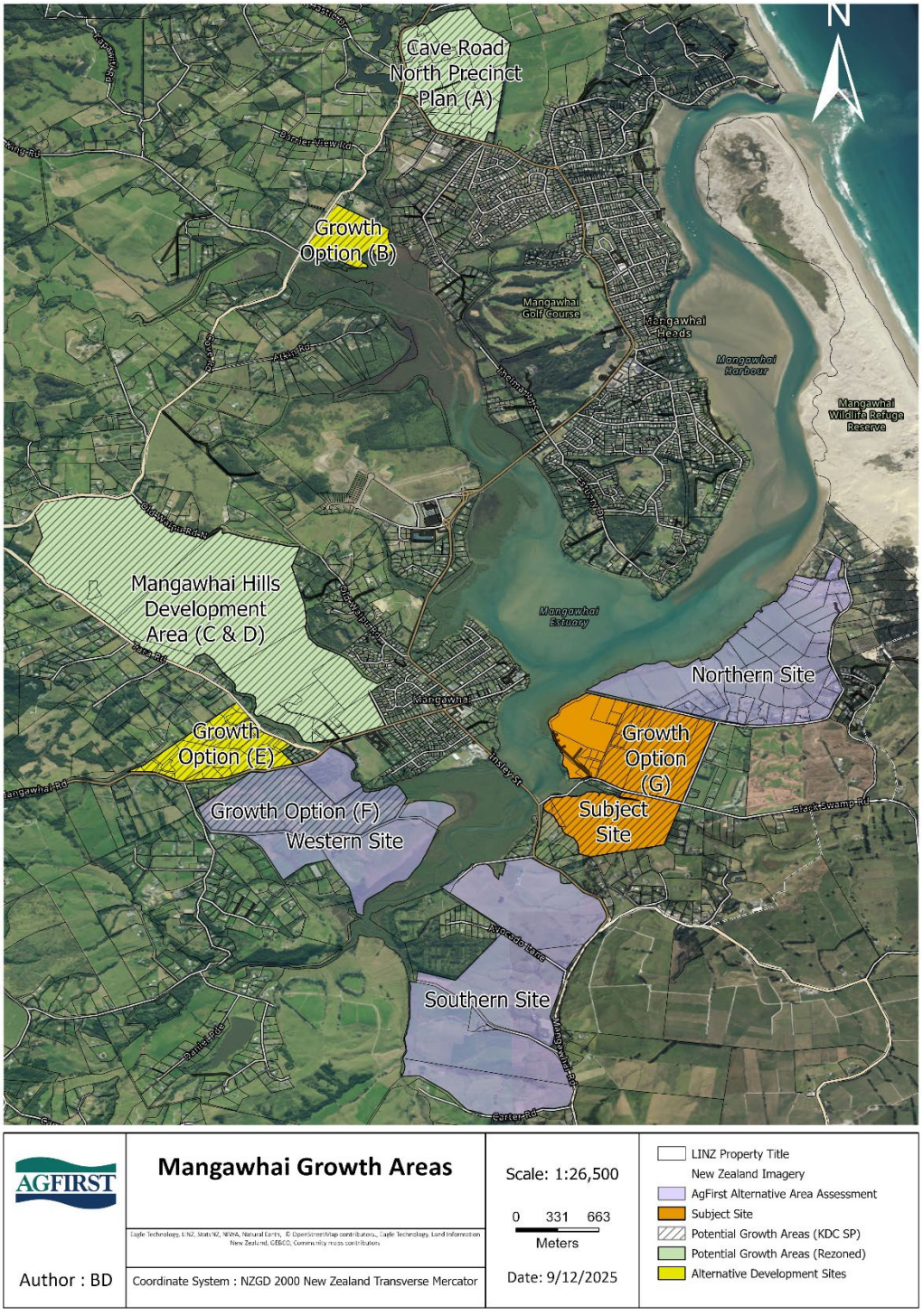


Figure 6: Assessment of alternative land for Urban development

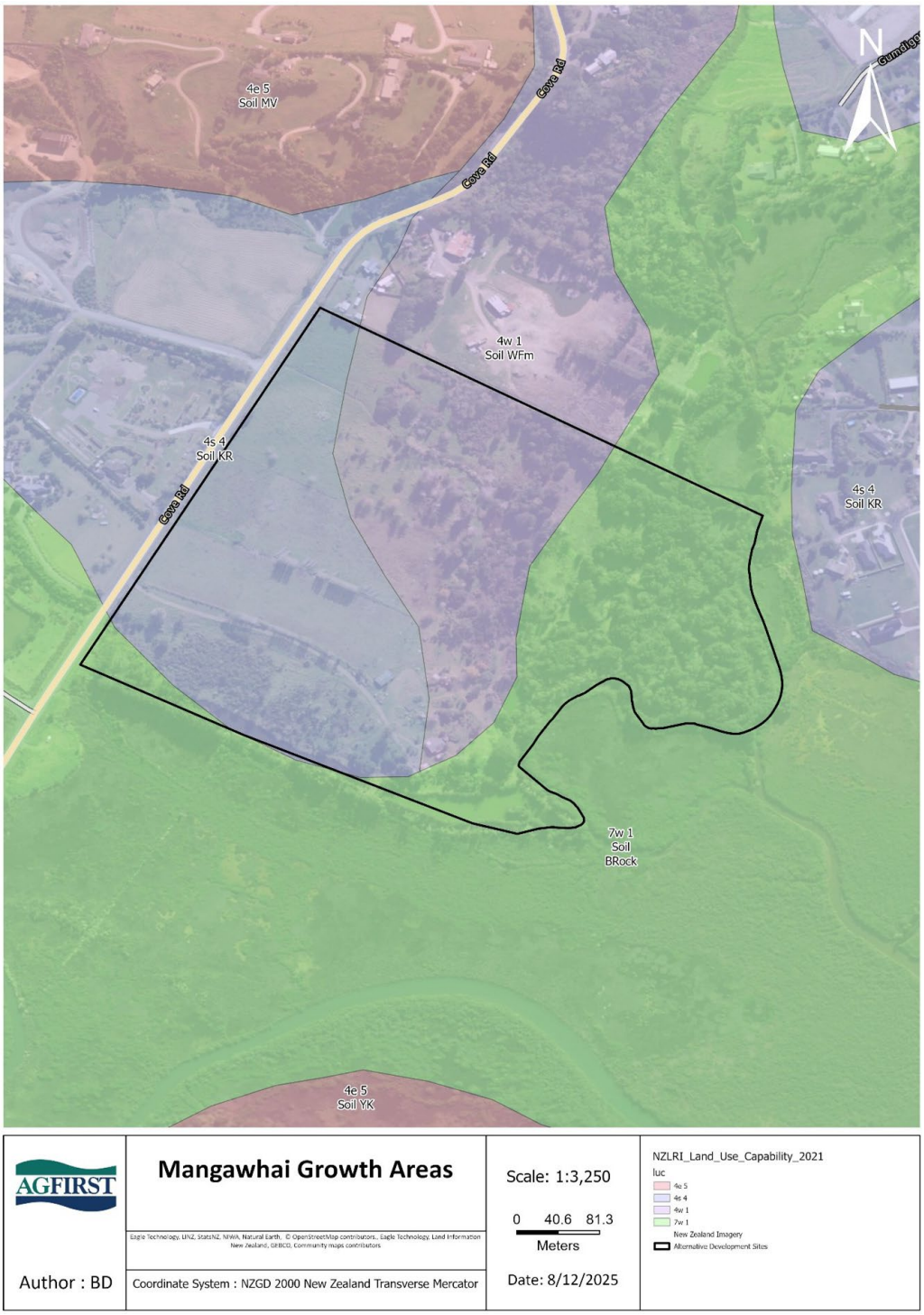


Figure 7: NZLRI LUC Map of Area B

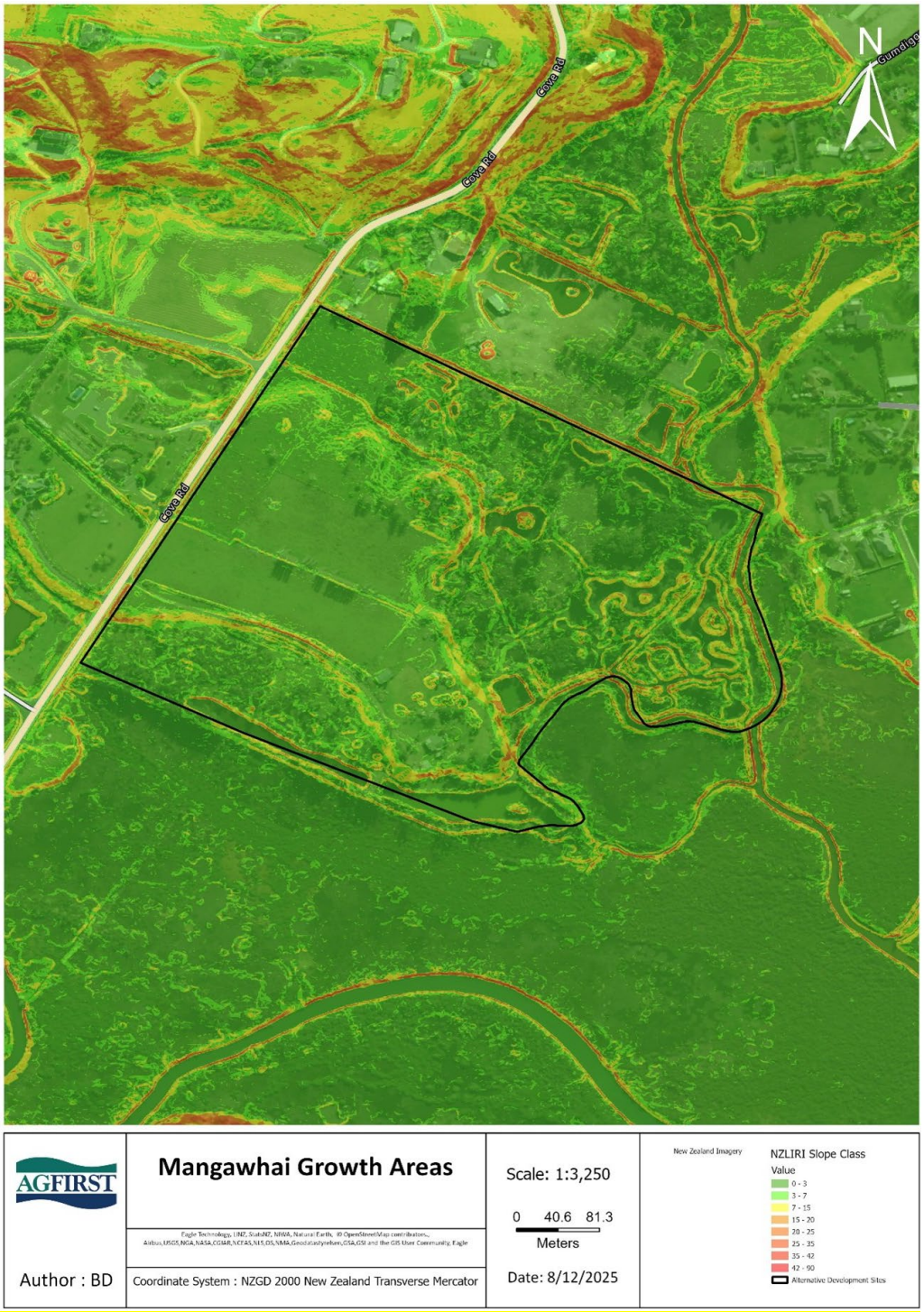


Figure 8: LiDAR Slope Class for Area B

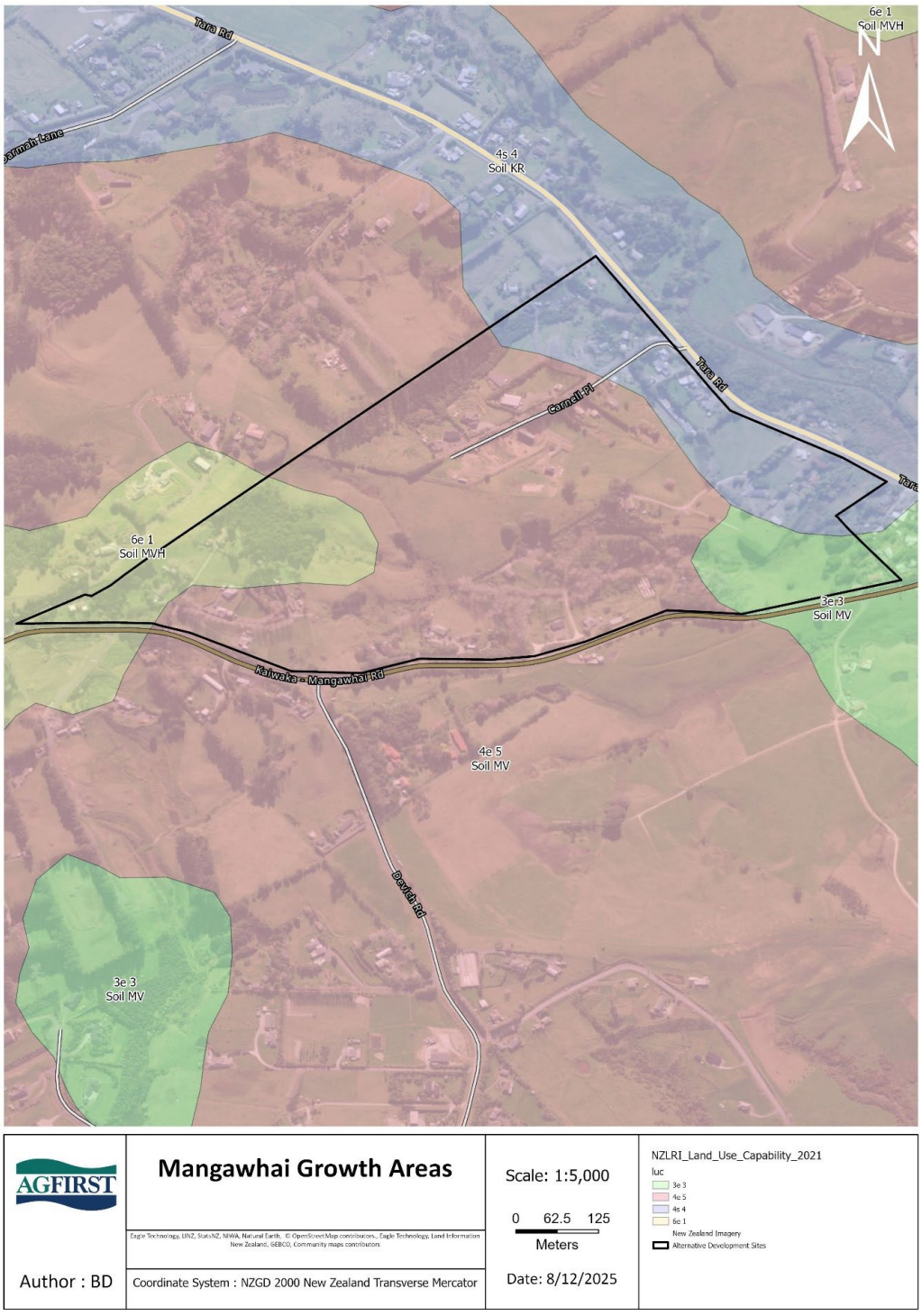


Figure 9: NZLRI LUC Map of Area E

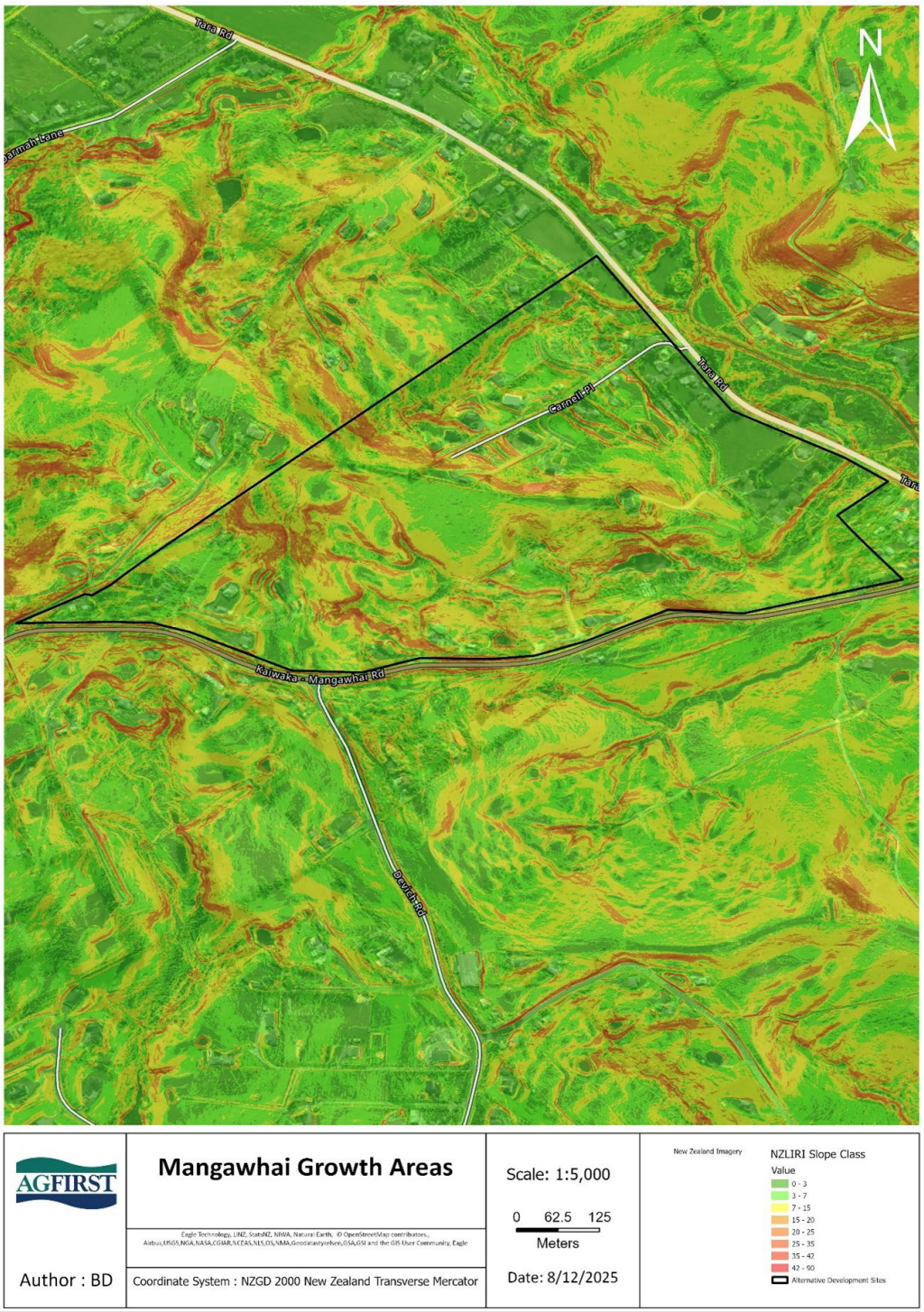


Figure 10: LiDAR Slope Class for Area E