BEFORE A HEARINGS PANEL
OF THE FAR NORTH DISTRICT COUNICL

I MUA NGĀ KAIKŌMIHANA MOTUHAKE O TE HIKU O TE IKA

Under the	Resource Management Act 1991 (**RMA**)
In the matter	of a request for rezoning of land in the Kerikeri-Waipapa area under the Far North District Plan

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SUMMARY STATEMENT OF EVIDENCE OF REECE BLACKBURN HILL IN SUPPORT OF SECTION 42A REPORT FOR HEARING 15D

RURAL PRODUCTIVITY

6 October 2025

SIMPSON GRIERSON

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1. INTRODUCTION

1.1 My name is Reece Blackburn Hill. I prepared a statement of evidence in relation to a rezoning request by Kiwi Fresh Orange Company Limited (**KFO**) in the Kerikeri-Waipapa area under the proposed District Plan of the Far North District Council (**Council**). I refer to my qualifications and experience in my original statement, dated 10 September 2025, and do not repeat those matters here.

1.2 The purpose of this statement is to provide a brief summary of my evidence, and to provide an initial response to the rebuttal evidence of KFO, noting that a full right of reply will be provided by the s 42A team (including additional expert input as required) following the hearing.

2. SUMMARY OF EVIDENCE

2.1 My evidence focuses on the KFO Site's soils, land use capability and productive capacity, specifically analysing the reports by Hanmore Land Management (**HLM**) and the AgFirst NPS-HPL Report that Mr Hunt relies upon in his evidence.

Site description and the proposal

2.2 The KFO Site is a rural property situated between the townships of Kerikeri and Waipapa. The topography is largely flat but includes steep vegetated slopes towards the Kerikeri River. A significant portion of the land is low-lying and subject to a flood hazard. The soils are a mix of old basalt volcanic and terrace soils, with the majority classified as Land Use Capability (**LUC**) Class 3 land, which is considered highly productive under the transitional definition of the National Policy Statement for Highly Productive Land (**NPS-HPL**).

Highly productive land status

2.3 Under the transitional definition of highly productive land in the NPS-HPL, 163.1 hectares of the KFO Site are classified as highly productive land. This accounts for approximately 81.9% of the total 199.2 hectare site area.

Site specific soil mapping

2.4 A LUC survey was undertaken by HLM. The HLM survey, which was provided with KFO's submission, provides a more detailed, finer-scale LUC map of the KFO Site and KFO has relied on it to determine the Site's productive capacity.

2.5 While HLM noted that further detailed soil mapping would be required to identify soil boundaries and exact areas of each LUC unit, Mr Hunt's evidence describes the survey as an "HLM soil and LUC assessment". I consider the HLM survey to be only a 'preliminary' LUC survey. The lack of detail creates uncertainty regarding the estimated areas of highly versatile soils and the soil and land limitations.

2.6 Based on the HLM Survey, 86 hectares (34.4%) of the KFO site is highly versatile soil, a mix of 36 hectares (14.4%) is a mix of both highly versatile and not highly versatile soil, and 98 hectares (39.2%) is not highly versatile.

Rural productivity

2.7 Based on soil and land characteristics alone, I maintain that the KFO Site, particularly its LUC 3s2 land, holds at least some potential for horticulture. LUC 3s2 land is considered potentially suitable for a wide range of crops, including horticulture, and land parcels with this LUC unit commonly support intensive horticulture elsewhere in the district.

2.8 While the KFO Site is currently used for dairy grazing and beef finishing, its previous use was for dairy farming. Mr Hunt notes that reinstating dairy farming would require significant capital expenditure, as the existing infrastructure is derelict. This suggests that the main reason for not considering dairy land use is the lack of compliant infrastructure, not the soil's inherent limitations.

Comparison with alternative sites

2.9 Mr Hunt's comparative analysis of alternative sites is flawed due to an inconsistency in data granularity. The KFO Site was assessed using a more detailed site-specific LUC survey, while the alternative sites were evaluated using broader NZLRI data and general desktop observations. More recent S-Map data, which was not included in the AgFirst NPS-HPL Report, indicates that the Southeastern Site is dominated by Ultic soils, which are unsuitable for horticulture. Given this, it is difficult to conclude that the KFO Site has a relatively lower productive capacity than the Southeastern Site. Furthermore, Mr Hunt's analysis does not consider the option of providing development capacity through intensification, which would avoid the loss of productive capacity altogether.

Effects on the district's overall productive capacity

2.10 In my opinion, the conversion of the KFO Site to urban use, despite being a small proportion of the district's highly productive land, would have cumulative effects due to the irreversible loss of productive soils. The proposed rezoning of the 199.2 hectare site would result in the loss of 163.1 hectares of highly productive land as defined under the NPS-HPL transitional provisions and the loss of 89 hectares of land with at least some potential for horticulture production.

3. COMMENTS ON REBUTTAL EVIDENCE PROVIDED BY MR HUNT

3.1 With regard to Mr Hunt's rebuttal evidence, I wish to add the following comments.

3.2 Mr Hunt has included in his rebuttal evidence (in Appendix A) a report by HLM that undertakes a new and more detailed soil and LUC assessment for the Site (**Revised HLM Report**). The Revised HLM Report was undertaken on 18 September 2025, following the preparation of my evidence.

3.3 The Revised HLM Report provides a more detailed assessment of the soils and LUC units for the Site and overcomes the shortcomings of the preliminary assessment relied upon by Mr Hunt in his statement of evidence dated 16 June 2025.

3.4 Mr Hunt has not relied on the Revised HLM Report for reclassifying highly productive land under the NPS-HPL, but rather to help determine the productive capacity of the Site (para 26 of his rebuttal evidence).

3.5 I have therefore taken statements (in para 33 of Mr Hunt's rebuttal evidence and section 5.2 of the Revised HLM report) that the Site contains 73% highly productive land as being imprecisely expressed. As set out in paragraph 5.4 of my statement of evidence, approximately 81.9% of the Site is highly productive land under clause 3.5(7) of the NPS-HPL. I agree that the Revised HLM Report may be suitable for determining the productive capacity of the Site, but not reclassification of the soils as highly productive land.

3.6 Based on the more accurate, finer scale soil and LUC information provided, the Revised HLM Report identifies 104.4 hectares of the Site as LUC unit 3s2 compared with 86 hectares in the preliminary HLM survey. As stated in my evidence, LUC 3s2 land is considered potentially suitable for a wide range of crops, including horticulture.

3.7 The LUC 3s2 mapped area comprises a mix of four soils with soil drainage ranging from poorly drained, through imperfectly drained to well drained.

3.8 Based on this new soil and LUC information, the soils in parts of the mapped LUC 3s2 area are variable with moderate limitations for horticulture, and in areas with poor soil drainage are unlikely to be suitable for horticulture.

3.9 For the LUC 3s2 areas with well drained Pungaere and Ōkaihau soils, the limitations are manageable with respect to horticulture, as has been demonstrated elsewhere in the district. Based on soil characteristics alone, my view is that these areas hold some potential for horticulture use, as is supported in section 5.2 of the Revised HLM Report, provided irrigation is available.

3.10 Mr Hunt indicates in his rebuttal evidence that irrigation is not available for the KFO Site. If this is so, then I agree that based on soil characteristics alone that the LUC 3s2 area would not be viable for horticulture.

Reece Hill

6 October 2025