

**BEFORE THE HEARING PANEL
APPOINTED BY KAPITI COAST DISTRICT COUNCIL**

IN THE MATTER OF | I TE TAKE O the Resource Management Act 1991

AND | ME

IN THE MATTER OF | I TE TAKE O Proposed Plan Change 5 (Private):
100 and 110 Te Moana Road,
Waikanae, Kāpiti Coast District

JOINT STATEMENT OF EXPERT WITNESSES

HIGHLY PRODUCTIVE LAND

Dated 15 September 2026

INTRODUCTION

1. Expert conferencing on the Highly Productive Land issues identified below took place from 8.30 am to 9.30 am on 15 September 2026, by Teams.
2. The conference was attended by the following experts:
 - (a) Mr Lachie Grant ("**LG**") (engaged by the Applicant);
 - (b) Ms Juliet Chambers ("**JC**") (engaged by Kāpiti Coast District Council)

CODE OF CONDUCT

3. The experts confirm that they have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and agree to comply with it. The experts confirm that the issues addressed in this Joint Witness Statement (**JWS**) are within their area of expertise, unless stated otherwise.

SCOPE OF EXPERT CONFERENCING

4. Expert conferencing addressed the following matters regarding the 1.87 hectares of the Plan Change 5 site at 100 and 110 Te Moana Road Waikanae (**the Site**) that qualifies as Highly Productive Land (**HPL**) under clause 3.5(7) of the National Policy Statement for Highly Productive Land 2022 (as amended in December 2025 (**NPS-HPL**)).
5. The Land Productivity Report (**LPR**) dated 26 August appended to LG's evidence was used as a reference and base for facts and assumptions relied on in conferencing between LG and JC on those matters.

JC agrees that the LPR dated 26 August 2026 addresses the matters identified in her primary evidence.

Does the HPL land present within the Site have constraints to its productive capacity, and if so what are they?

6. LG and JC agree that the HPL land has significant constraints as outlined in section 9.2 of the LPR. The dominant constraints include drainage limitations and weak soil development.
7. Record any points of disagreement.

There were no points of disagreement.

Are those constraints long term or permanent?

8. LG and JC agree that the constraints are long term or permanent.
9. Record any points of disagreement.

There were no points of disagreement.

Are there any reasonably practicable options to address those constraints?

10. LG and JC agree that there are no reasonably practicable options to address these constraints.
11. Record any points of disagreement.

There were no points of disagreement.

What are the potential economic returns from land based primary production of the HPL present within the Site?

12. LG and JC agree with the assessment of potential economic returns from land-based primary production set out in sections 9.5 and 9.6 of the LPR.
13. Record any points of disagreement.

There were no points of disagreement.

Are the clause 3.10 tests met for the full 1.87 ha of HPL land present within the Site?

14. LG and JC agree that the updated LPR adequately addresses the matters relevant to the assessment of Clause 3.10 of the NPS-HPL and supports the conclusion that the Clause 3.10 criteria are satisfied.
15. Record any points of disagreement.

There were no points of disagreement.

Clarify where the HPL land present within the Site sits relative to the Lot 1/Lot 2 boundary

16. Two maps are appended to this JWS showing the location of the regional-scale and paddock-scale LUC mapping relative to the proposed Lot 1/Lot 2 boundary.
17. LG and JC agree that the location and extent of the mapped areas are accurately shown on the appended maps. Further detail is contained within the

LPR dated 26 August 2026.

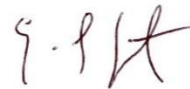
Comment within areas of expertise on matters referred to in paragraph 6 of Direction #4 (NPS-HPL Clause 3.6)

18. LG considers this outside his area of expertise and defers it to the planners.
19. JC considers the issues raised in paragraph 6 are primarily within the expertise of the planning witnesses. To the extent that the productive capacity of the land and the implications of its loss for land-based primary production are relevant, she relies on the existing evidence before the Panel and agrees that the updated LPR dated 26 August 2026 adequately addresses the matters raised in her primary evidence.

SIGNATURES OF EXPERTS



Juliet Chambers (15 Sept 2026)



Lachie Grant (15 Sept-26)

Regional scale LUC



Paddock scale LUC

