

**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

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**STATEMENT OF EVIDENCE OF  
IAIN LACHLAN GRANT  
ON BEHALF OF ERIC, VINCE AND RAECHEL OSBORNE**

**Dated 2 September 2026**

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## **Introduction**

1. My full name is Iain Lachlan Grant.
2. I have prepared this Statement of Evidence regarding Private Plan Change 5 (PC5) to the Kapiti Coast District Plan, in relation to highly productive land matters.

## **Qualifications and experience**

3. I have the following qualifications and experience relevant to this assessment:
  - a. I hold a Masters of Agricultural Science with honours (specialising in pedology, land resources, erosion processes and soil mechanics) from Massey University. I also hold a Bachelor of Agricultural Science (specialising in soils, nutrient management, agricultural engineering and farm management) from Massey University.
  - b. From 2005 to present I have worked as the director/owner of the land management consultancy company LandVision Ltd specialising in soil, land resources and LUC mapping, whole farm planning, effluent and nutrient management, productive yield gap assessments, sustainable land resource management and land productivity. I am conversant in farm and forestry systems. To date LandVision Ltd has soil and LUC mapped at the paddock scale more than 1.2 million hectares of farmland for farm and environmental planning on dairying, sheep and beef, horticulture, gardening, and forestry properties throughout New Zealand.
  - c. I have been involved in the preparation of more than 40 land productivity reports as part of the National Policy statement for Highly Productive Land (NPS-HPL) within the Tasman, Manawatu, Canterbury and Hawkes Bay regions and have peer reviewed more than 15 productivity reports for seven different councils throughout New Zealand.

## **Code of Conduct**

4. I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and confirm that I have complied with it in preparing this evidence. I confirm that the issues addressed in this evidence are within my area of expertise, except where I have indicated that I am relying on others' opinions. I have not omitted material facts known to me that might alter or detract from my evidence.

### Summary of work completed

5. I prepared the land productivity report titled 'Osborne Land Productivity Report, Te Moana Road, Waikanae' dated August 2026 appended to this evidence (**Land Productivity Report**).
6. Prior to preparing this report I also prepared the following reports:
  - a. Osborne LUC and Soil Resources Report (February 2023). This land resources report forms the basis for the paddock scale resource information for the property and is used in preparing the subsequent reports referred to in my evidence.
  - b. Osborne Land Productivity Report (February 2023). This report used the land resource information from above and undertook an analysis with respect to the NPS HPL.
  - c. The February 2023 Land Productivity Report was revised in April 2025 to respond to the peer review undertaken by Mr Sharn Hainsworth and commissioned by the Kapiti District Council.
7. The (August 2026) Land Productivity Report appended to my evidence represents a comprehensive revision to the earlier reports to address and respond to the matters raised in the evidence of Ms Juliet Chambers as commissioned by the Kapiti District Council and supersedes those earlier reports. Principally this is to ensure that the findings in the earlier reports cover the full extent of Highly Productive Land (**HPL**) as mapped under the NZLRI, and adopted for defining HPL under the NPS-HPL, as required by case law after the earlier reports were prepared (*Blue Grass v Dunedin City Council* NZ [ 2024] EnvC 83).
8. The August 2026 Land Productivity Report includes the response to the earlier peer review by Mr Sharn Hainsworth and reaches the same overall findings as the earlier reports. It addresses the productive capacity and constraints on that capacity for the 1.87 ha of HPL present within the PC5 site and includes a complete clause 3.10 assessment for that full area of HPL.
9. I have also produced and included as Appendix 4 to the August 2026 Land Productivity Report, a table summarising specific responses to points made in Ms Chambers' evidence, with reference to the content of that report .
10. I **adopt** the August 2026 Land Productivity Report, as my opinion for the purpose of this hearing.

## Summary of opinion

11. For convenience, I summarise the conclusions and main findings from the August 2026 Land Productivity Report 'as follows:
12. The regional scale (1:50,000 scale) land use capability (LUC) map showed that the property contained **1.87 ha of 2s1 and 2w1** land and 3.93 ha of 6e5 land. Since this map showed there was LUC 2 class land within the PC5 site it triggers the NPS HPL. With the proposed plan change to residential, the loss of HPL land cannot be avoided and hence the analysis of NPS HPL under clause 3.10 has been completed.
13. To assess any long term or permanent constraints a paddock scale (1:6,000 scale) assessment of the underlying geology, soil resources, slope classification, vegetation, and erosion type and severity was undertaken. This information was used to generate a paddock scale land use capability classification of the area. The LUC units identified included Illw3 (0.8 ha), IVe4 (1.3 ha), VIe5 (2.0 ha), VIw1 (0.8 ha), VIs4 (0.8 ha), and VIIIw1 (0.2 ha) over the PC5 site as a whole. (Note that the LUC class under paddock scale mapping is recorded with roman numerals).
14. The LUC Handbook protocols require one observation point for every square centimetre on the map. For 1:50,000 scale mapping this is one sample point every 25 ha and or 1:6,000 scale mapping this is one sample point every 3,600 m<sup>2</sup> (0.36 ha).
15. Of the 1.87 ha of HPL land mapped from the NZLRI regional scale mapping, about 0.67 ha is classified as Illw3 land, 1.11 ha is classified as IVe4 land and 0.09 ha is classified as VIe5 land under paddock scale mapping.
16. For the areas of classified HPL land that contain IVe4 and VIe5 LUC units (about 1.20 ha), the opportunity for highly productive land use is constrained by slope, very weak soil structure, and limited topsoil depth. The textures are generally loamy sands and with weakly developed soil structures they have very low moisture holding capability. If the vegetative cover is removed, then these soils are prone to severe wind erosion. These factors are considered permanent or long-term constraints to highly productive land use. Further to this, their natural fertility is considered low, although this can be corrected with fertiliser by regular application.
17. The remaining area of HPL land (0.67 ha) are wet or poorly drained sand flats (Illw3 land) where their position in the landscape makes them difficult to drain. The fluctuating water table restricts crop selection to plants that can handle 'wet feet' and these soils are not suited to heavy cattle for much of the year due to the potential for pugging and treading damage. Soil structure is generally weakly

developed and soil textures are loamy sands. This soil type or LUC unit is fragmented making management and opportunities difficult. These physical properties cannot be changed and therefore considered long term or permanent constraints for highly productive use.

18. Using the paddock scale LUC mapping I was able to ascertain the highest and best productive use for the different LUC units identified. The highest and best productive use for IIIw3, IVe4, and VI s1 is low intensity pastoral grazing. LUC unit VIe5 is best suited to production forestry although it can sustain low intensity grazing with soil conservation practices. LUC units VIw1 and VIIIw1 are retirement land. None of the LUC units could sustain what is considered highly productive land uses.
19. For each LUC unit under pasture, there is information available as to their livestock carrying capacity. For the 1.87 ha of HPL land as identified by the regional scale mapping, the different LUC units can collectively support about 19 stock units. The remaining area of non-HPL land can support about 10 stock units. The whole block could support about 29 stock units. Typical livestock operating surpluses are about \$100 per stock unit per year or \$2900/yr.
20. The highest and best productive use for VIe5 land is forestry. The estimated returns from forestry are currently about \$8000/ha after 28 years. This is equivalent to an annual investment of \$120/ha at 6% interest rate or \$240 over the 2 ha of VIe5 land present within the PC 5 site.
21. The combined annual returns from both livestock and forestry are about \$3,140 per year. Currently the rates on part of the subject land are \$7,690/yr. The income from the whole block is insufficient to cover even half of the rates, let alone any mortgage or drawings. The income is even less when applied to just the HPL land present within the PC 5 site. Hence the block is considered uneconomic under the highest and best productive use over the longer term.

## **Conclusions**

22. The 1.87 ha of land classified HPL is a mosaic of poorly drained sand flats (0.67 ha of LUC IIIw3), weakly developed and excessively drained higher sand plains prone to severe wind erosion under cultivation (1.1 ha of LUC unit IVe4) and unstable dry sand dunes (0.9 ha of LUC unit VIe5) prone to severe wind erosion.
23. The area of HPL land does not have the capacity to support highly productive land uses over the long term due to the poor soil physical properties of IVe4 and VIe5 (weak soil development, low soil moisture holding capability, wind erosion potential), the poor drainage of the IIIw3 unit with the inability to practically drain it, and the lack of scale combined with the mosaic nature of

the soils and LUC units present. These are all long-term or permanent constraints for highly productive land use for area mapped as HPL land that cannot practicably be addressed, as explained in section 9.3 of the Land Productivity Report.

24. I conclude that land- based primary production on the HPL land is not economically viable in the long term (i.e. for at least 30 years). Using highest and best productive use the returns from the total area of the subject land cannot support the council rates let alone any mortgage or drawings. The stock carrying capacity of the HPL land is about 19 stock units and its loss from development is not significant for the productive potential for the district. There is no opportunity for amalgamating the HPL land with neighbouring blocks and leasing is considered uneconomic. The activity also avoids fragmentation and reverse sensitivity.
25. The environmental, economic and social impact from the proposal is all considered a net positive whilst no cultural costs or benefits were identified. Overall, the proposal meets clause 3.10 of the NPS HPL.

**Lachlan Grant**

**2 September 2026**