This submission seeks that 128 Baynons Road, Clarkville be zoned RLZ under the PDP. This report addresses how the property meets exemption criteria of the NPS-HPL (Clause 3.10 of NPS-HPL sets out the exemption criteria for such GRUZ to RLZ HPL rezonings.)

1. That the site must be subject to permanent or long-term constraints that mean the use of the HPL for land-based primary production is not able to be economically viable for at least 30 years, and that such constraints cannot be addressed through any reasonably practicable options that would retain productive capacity (e.g., changing farming practices) (Clause 3.6(2)). It states that the size of a landholding is not of itself a determinant of such a constraint (Clause 3.10(4))

Economic

I had discussions with Marie Bax (nee Ballantine) and the Ballantine family. The Ballantine parents owned the farm for 45 years and initially used it for dairy grazing before retiring on the block. In subsequent years it's been used for intermittent grazing of cattle and horses but hasn't sustained any meaningful productive use or produced any significant income for over 30 years.

In reviewing the economic viability of the property, I consulted with Kerry and Cheryl Walshe, of Bidibid Ltd., a large dairy and beef operation. Utilising their financial figures for the 2024 year, a budget spreadsheet for the property was produced (appendix 1). After their viewing the property, it's estimated a carrying capacity of 65 head of beef, whilst producing onsite supplement feed would be appropriate. As seen in appendix 1, a profit of \$3375.20 would be expected. This represents a 0.23% return on investment. Note, this is based on a freehold property, so when considering mortgage costs, a significant loss will occur.

Intensification of the operation would be required to make it viable. Extrapolating the spreadsheet data to 200 cattle would see an acceptable return. But given the size of the property and without radical, undesirable changes such as feedlots - this simply isn't possible.

Environmental

The Kaiapoi River flows west to east through the property, with several springs and soft wetlands to the north of the river. WDC have esplanade provisions placed on the river in the event it gets subdivision approval. ECAN also have a strong desire to create a reserve around the river and along the southwest boundary creating a recreational link from the Waimakariri River through to Silverstream Reserve. The Ballantine family had an MOU in place with ECAN and I discussed the MOU with Andrew Arps, Northern Delivery Manager at ECAN. He was familiar with the MOU and had been involved with fencing and plantings that have taken place on the property. Part of our conversation was based around land use options and how they may affect the river and wetland areas. Andrew was familiar with the soil structure and stated the vast majority was quite stoney with small areas of good topsoil to the north amongst wetland pockets. He agreed that light beef grazing would be appropriate on the property but stressed a small number of sheep should be used to graze around the river and wet areas (not cattle).

As addressed earlier in this report, without intensification of farming practices, the property isn't economically viable. With intensification comes the risk of nitrate leaching and this is especially so in alluvial soils, such as those on the property. Given the proximity of the Kaiapoi River, within the farming footprint and the high water table, any increase in irrigation, fertilisation, stock effluent, pesticides etc. will likely pose a leachate risk. Given the natural beauty of the Kaiapoi River and its importance for recreational activities, intensification would be constrained.

Soil Quality

- 1. The Our Environment website (https://ourenvironment.scinfo.org.nz) provides land use capability maps and property specific limitations to land use. The data provided for 128 Baynons Road, states the dominant limitation to land use is, "Soil physical or chemical properties in the rooting zone such as shallowness, stoniness, low moisture holding capacity, low fertility (which is difficult to correct), salinity or toxicity first limits production."
- 2. Kerry and Cheryl Walshe viewed the land to evaluate the livestock holding capacity before producing a farm budget. It was noted, most of the soils to the south were highly alluvial and of generally low quality and would require irrigation and significant fertilizer input to maintain growth year-round. Some smaller pockets of higher quality soils exist to the north of the Kaiapoi River but are associated with low lying wet areas and former wetlands (this is reflected in the WDC flood modelling data).
- 3. I had discussions with Maurice Newell, of Property Brokers Ltd., who is familiar with the property. He placed a submission (281.3) and spoke during hearing stream 6. During the hearing, he used the property as an example of "land that should have been left in the 4ha zone". He stated, "We have been told by council staff that it is classified as soil importance 3, but most is straight shingle, so much so that Ready Mix were interested in it for shingle extraction.". Maurice also had discussions with Katherine McCusker, farm environment consultant, Pattle Delamore Partners Ltd. During their correspondence, Katherine stated, "I have had a quick look at the soil maps and I agree the Rakaia soils appear to be very stoney for a LUC 3 soil and just as stoney as soils on the Ngai Tahu farms that are Lismore 2a.1 which are LUC 4 and not considered to be versatile productive land."
- 4. You will recall Andrew Arps's opinion of the soil mentioned earlier in this report.
- 5. I had discussions with Marie Bax and the Ballantine family. Marie said, due to the nature of the dry alluvial soils, it was ideal for winter grazing of their dairy herd, with all supplement feed being brought off site. But the land couldn't sustain year-round production.

Given the independent, individual opinions of the people I've spoken to and the data from the Our Environment website corroborate. It's quite clear the property will be constrained by soil quality and should likely be considered LUC 4 or marginal HPL at best.

Bird Strike Control Measures and Reverse Sensitivity

CIAL submission on bird strike issues. The property falls within the 8km airport bird strike buffer and could be subject to land use controls including but not limited to, planting fruit trees, intensive cattle farming, pig farming and cropping. This could present a major constraint on intensification, changing land use and diversification.

Because the property is surrounded by lifestyle blocks and public amenities such as Baynons Brake, Silverstream Reserve and a potential future reserve on the property itself. Reverse sensitivity issues could arise because of intensification and restrict land use options.

Alternative Farming Options and Practices

The Our Environment website (https://ourenvironment.scinfo.org.nz) not only supplies LUC information, but also provides additional map layers with information such as "most intensive, sustainable land use possible". In this instance, the property falls under the category of "intensive grazing" (land with sometimes severe limitations to arable use but capable of

supporting intensive grazing with cultivation for pasture renewal or occasional cropping) (appendix 2). Given this information, it's clear there's no financially viable alternative to grazing.

With regards to alternative practices, the only option would be to intensify. The constraints regarding intensification have been discussed previously and I believe the property is near its maximum capacity within those constraints. Furthermore, intensification would likely require consent. Given the location and characteristics of the property I believe intensification would be constrained by the consent process.

2. That the subdivision, use or development of HPL would avoid significant loss of productive capacity of HPL (Clause 3.6(1)(b)(i))

Given the constraints mentioned above limiting intensification. Subdivision would not result in significant loss of productive capacity of HPL.

3. That it avoids fragmentation of large and geographically cohesive areas of HPL (Clause 3.6(1)(b)(ii))

Located at the end of Baynons Road, it is the only property not zoned RLZ. East of the property are lifestyle blocks of approximately 4ha. South is the Waimakariri River. West, accessed off Harpers Road, are lifestyle blocks of approximately 4ha. To the north and separated by Harpers Road, is farmland (appendix 2). Harpers Road forms a sensible barrier from HPL and would avoid fragmentation in the event of subdivision. Subdivision would provide a cohesive flow of lifestyle properties and lifestyle activities without reducing cohesive HPL.

4. That it avoids or mitigates potential reverse sensitivity effects on surrounding primary production (Clause 3.6(1)(b)(iii))

Because the property is mostly surrounded be lifestyle sized blocks, lifestyle activities and is separated by a definitive barrier from farmland (Harpers Road). There would be little opportunity for reverse sensitivity on nearby primary production.

5. That the benefits outweigh the long-term costs, considering both tangible and intangible values (Clause 3.10(1)(c))

The property's position amongst established lifestyle blocks would provide cohesive land use. Its proximity to Christchurch and Rangiora is exceptional, with reserves and recreational activities on its doorstep and an easy commute to work, schools and amenities the property is very much suited to RLZ. Clarkville, is a desirable area for those seeking a lifestyle block and properties are tightly held within the area. Given the farm cannot sustain meaningful productive capacity, it would be more beneficial zoned RLZ. RLZ would provide more opportunity for individuals and families to live in and utilise everything Clarkville has to offer and I believe this outweighs the costs of changing zone.

The property is in a unique position, having the stunning Kaiapoi River flow through it. Given the WDC has esplanade provisions in place and ECAN have expressed an interest in creating a reserve, allowing subdivision would secure that potential. This would provide a significant benefit to the community.

Summary

With the provided evidence, I believe the property meets the exemption requirements expressed in NPS-HPL clause 3.10 and therefore be included as RLZ in the PDP.

Appendix 1

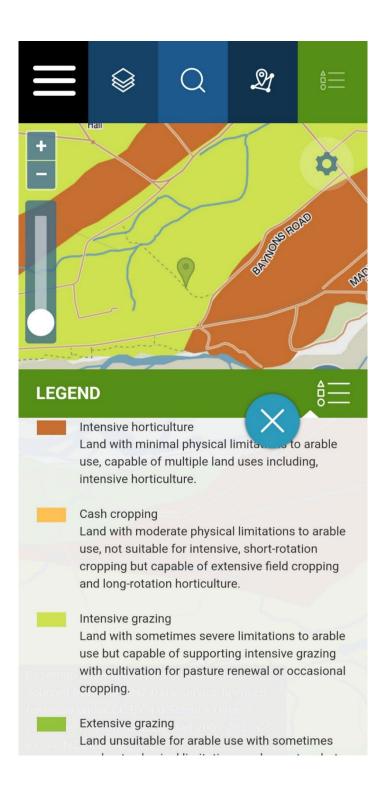
128 Baynons Ro	ad Farm Budget					
Livestock	Weaner Calves	65	\$	580.00	\$	37,700.00
	Transport	65	\$	8.00	\$	520.00
Feed	Bailage (10 conventional equivalen	100	\$	60.00	\$	6,000.00
	Hay (10 conventional equivalent)	100	\$	40.00	\$	4,000.00
	Meal (per tonne)	3	\$ 1	1,000.00	\$	3,000.00
Health	Drench	65	\$	24.00	\$	1,560.00
	Vet				\$	800.00
	Misc.				\$	500.00
Repairs and Maintenand	Fencing/water/tracks				\$	2,000.00
Fertiliser	Super + k (0.3T/ha over 40ha)	12	\$	565.00	\$	6,780.00
	Spreading (per tonne)	12	·	80.00	\$	960.00
Vehicle and Machinery	Tractor/plant/Machinery				\$	2,400.00
	Fuel				\$	1,200.00
Operational	Rates				\$	3,776.00
	Insurance (two sheds)				\$	700.00
	Liability Insurance				\$	440.00
	Power				\$	1,092.00
	Accounting				\$	1,200.00
Total Expenses					\$	74,628.00
Sales	Sales 2% Loss	64	\$ ^	1,280.00	\$	81,920.00
Cost of Sales	Transport	64	\$	10.00	\$	640.00
	Commission	34	Ψ	4%		3,276.80
Total Sales					\$	78,003.20
Profit/Loss					\$	3,375.20
Registered Valuation	Less Domestic Portion excl. GST				\$1,485,715.00	
Return on Investment						0.23%

Notes

- 1. All values exclude GST.
- 2. Estimations of capacity and additional requirements were based on site visits.
- 3. Figures used are based on 2024 financial pro rata data provided by Bidibid Ltd., a large dairy and beef operation.
- 4. Property valuation provided by Geof Maxwell, of Maxwell Valuation and excludes curtilage.

Appendix 2

Map of most intensive, sustainable land use possible, provided by Landcare Research and the Our Environment website (https://ourenvironment.scinfo.org.nz)



Appendix 3

