

BEFORE AN EXPERT CONSENTING PANEL

IN THE MATTER of the Fast-track Approvals Act 2024 (**FTAA**)

AND

IN THE MATTER of an application for approvals by Winton Land Limited to subdivide and develop 244.5 hectares at Old Wairoa Road, Cosgrave Road, and Airfield Road between Takanini and Papakura, Auckland into approximately 3,854 homes, consisting of individual homes and 3 retirement villages containing independent living units and associated features such as a 7.5 hectare town centre, a school, 4 local hubs, open spaces, green links, recreation parks and reserves and ecological areas (**Application**)

**‘WILL SAY’ STATEMENT FOR EXPERT WITNESS CONFERENCING BY DR
DANI GUINTO (AUCKLAND COUNCIL)**

Loss of Highly Productive Land – Soil and Land Use Capability

Dated: 10 November 2025

1. INTRODUCTION

- 1.1 This 'will say' statement is provided by Dr Dani Guinto on behalf of Auckland Council in relation to expert witness conferencing for the Sunfield Fast-track Application under the FTAA.
- 1.2 This statement relates to issues concerning the loss of highly productive land (**HPL**) as a consequence of the Application and proposed development, and specifically whether the exemption in clause 3.10 of the National Policy Statement on Highly Productive Land (**NPS-HPL**) is met. I address this from a soil science perspective.
- 1.3 I previously prepared a report for the Council on these matters entitled "Annexure 17: Soil and Land Use Capability" dated 4 August 2025 (**the Report**).

2. QUALIFICATIONS AND EXPERIENCE

- 2.1 I am a senior land and soil scientist employed by the Council. I have some 41 years of experience practising as a soil scientist, and have a PhD in soil science. My qualifications and experience are set out in paragraphs 2 - 4 of my Report and are not repeated here.

3. CODE OF CONDUCT

- 3.1 I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses (**Code**) and have complied with the Code in the preparation of this statement. I agree to follow the Code of Conduct when participating in expert conferencing and any subsequent processes directed by the Expert Panel. I confirm that the opinions I express are within my area of expertise and are my own, except where I state that I am relying on the work or evidence of others, which I have specified.

4. CONFIRMATION OF PREVIOUS REPORT

- 5.1 I confirm that I am the author of the Report, and that I stand by the analysis, conclusions and recommendations contained in the Report (which are not repeated), subject to:
- (a) The updated opinions expressed in **Section 5** of this statement, which are provided in response to the revised Application and

updated information received from the Applicant in response to comments; and

- (b) Any refinements or clarifications that may arise through the expert conferencing process.

5. UPDATE AND SUMMARY COMMENTS

5.1 Conferencing has been directed to occur on the topic of highly productive soils generally, however both the Council's and applicant's lists of issues identify a specific question as to whether the Application meets the exemption criteria of clause 3.10 of the NPS-HPL. My comments below address this issue from my perspective as a soil science expert.

5.2 The Applicant has provided a report "Soil and Land Use Memorandum – Landsystems" prepared by Dr Reece Hill of Landsystems, dated 25 August 2025. This report is an assessment of the site stating Dr Hill's view that the soils are not as versatile and productive as some other Auckland soils and have significant limitations for cropping.

5.3 The Applicant has provided a map showing the locations of soil observations that were not previously present in the original site-specific soil and land use capability (**LUC**) classification mapping. This informs well the basis for the proper delineation of the soil/LUC map units that have been identified.

5.4 Dr Hill emphasises soil limitations for intensive land uses like cropping and horticulture, including poor drainage, heavy clay subsoil, and presence of peat (Hill, paras 1.4-1.7). I make several observations:

- (a) Dr Hill notes that the areas with Clevedon soils are "*most suited to pastoral use with limitations during wetter periods*" (Hill, para 1.6).

- (b) Pastoral land use may already be adequate to realise the intent of the NPS-HPL which is to retain areas of HPL for primary production use now and in the future.

- (c) As Ms Underwood notes "*Land based primary production is occurring on the land, and has been for decades, managing through the site constraints. The most common activities are pastoral, through grazing of horses and cattle.*" (Underwood 'will say', para 5.4).

(d) Areas of land towards Clevedon are largely mapped in the NZLRI as LUC unit 2w6 and described as flat to undulating floodplains and terraces below 200 m with Organic soils developed on peat and alluvium in moderate rainfall (1100-1300mm) areas, with a slight wetness limitation after drainage (https://ourenvironment.scinfo.org.nz/maps-and-tools/app/Land%20Capability/lri_luc_main). It is possible that the soils in the unsurveyed portions of the project area could be similar to these soils when mapped in detail which I described in my first Report as currently supporting varied primary production land uses (Section 18, p. 7).

(e) As far as I am aware, there is no requirement under the NPS-HPL that HPL be used for intensive land uses such as cropping or horticulture – it must just be any land-based primary production.

(f) There are areas within the northeast of the site with 2s4 soils, outside the NZTA's Mill Road alignment) which Dr Hill acknowledges have *“good drainage and would be suitable for intensive arable or horticulture”* (Hill, para 2.4).

5.5 For the non-surveyed zones that cover a combined total area of 40.7 ha in the northeast and southwest of the project site, the Applicant has performed desktop mapping only and indicated in the Soil and Land Use Memorandum (Hill, para 3.2) that access to these areas for a detailed on-site survey was “not possible” without stating what the reasons are. I make several observations in this regard:

(a) This combined area is large and could exhibit large soil spatial variation and hence soil map/LUC unit variation.

(b) In my view, given these two factors, on-site survey would be preferable.

(c) I also consider the ‘best estimates’ should be approached with a degree of caution. For example, in the case of the large unsurveyed block to the northeast, it is quite possible that the area contains some 2s4 soils (with good drainage and suitable for intensive arable / horticulture), having regard to adjacent 2s4 land.

5.6 In summary, from a soil science perspective, some of the site soils have documented limitations for intensive horticultural and arable cropping uses, while other parts of the site are suitable for such uses. All of the site soils support pastoral primary production, as evidenced by current and historical land use. The presence of some areas with more versatile soils (2s4), combined with the large unsurveyed area where soil variability is uncertain, suggests the site contains a range of soil capabilities. In my view, the soil characteristics do not constitute absolute barriers to land-based primary production; rather they influence the type and intensity of primary production suited to the site. The question of economic viability of such production is addressed by Dr Meade in his evidence.

DATED the 10th day of November 2025

Dr Dani Guinto