

From: "Antony Vogt" <antony@jsl.nz>
Sent: Tue, 4 Nov 2025 11:29:10 +1300
To: "Nicola Laurenson" <nicola@laurensonplanning.co.nz>
Subject: Re: 24 Te Arei Road - Popuanui Chickens Limited
Attachments: 25063 - 24 Te Arei Road - S92.pdf, NPS-HPL Report Popuanui Chickens Limited V2 Final.pdf

Good Afternoon, Nicola,

Thank you for catching up yesterday .
As discussed, please find the S92 response for this job attached as well as the peer reviewed and updated NPS-HPL Assessment.
Thank you,

Cheers,

Antony Vogt | Planner | BEP | Int.NZPI
Prospero Place Stratford | + (029) 048 11006



Juffermans Surveyors Ltd

Our other offices:

155 Princes Street | Hawera | 06 278 4135
32 Ridgway Street | Whanganui | 06 345 0333

From: Richard Watkins <Richard.Watkins@npdc.govt.nz>
Sent: Wednesday, October 15, 2025 2:59 PM
To: Antony Vogt <antony@jsl.nz>
Cc: Nicola Laurenson <nicola@laurensonplanning.co.nz>
Subject: RE: 24 Te Arei Road - Popuanui Chickens Limited

Hi Antony,

In addition to Nicola's response, I note that:

- The activity status when the application was lodged was (full) Discretionary. The activity status remains as is at the time of lodgement despite the rules of the Part Operative District plan now having effect (S88A of the Act).

- The proposal in its final form will be assessed against the PODP. The removal of one allotment from the original proposal will not alter the consideration than if the current scheme had been submitted originally;
- Pursuant to S100(b) of the Act, the applicant can request that the matter be heard and a decision made by an independent Commissioner (S100 of the Act). If you wish for the matter to be heard can you please advise Nicola. Off course, the costs of conducting the hearing will be recoverable.
- Rather than mediation, a pre-hearing meeting can be held if you wish to. From this, actions may be undertaken by the participating parties such as modifying the application, agreeing of draft conditions etc which may inform the final consideration of the proposal;

Given the current status of the application, and my potential role in making a decision on the application under delegated authority if it is not heard, it would be inappropriate for me to indicate what the decision on the application could be as it would be pre-determining the outcome before considering the recommendation on the proposal. Hopefully the emails you have received on this matter have assisted you in the approach that could be taken in how the decision on the application is made and some of the relevant considerations.

Kind regards,

Richard Watkins
Principal Planner

New Plymouth District Council | Liardet St | Private Bag 2025 | New Plymouth 4340 | Ph 06-759 6060 Mobile 0272 605 977
www.newplymouthnz.com | [Facebook](#) | [Twitter](#)

From: Nicola Laurenson <nicola@laurensonplanning.co.nz>
Sent: Wednesday, 15 October 2025 9:19 am
To: Antony Vogt <antony@jssl.nz>; Richard Watkins <Richard.Watkins@npdc.govt.nz>
Subject: RE: 24 Te Arei Road - Popuanui Chickens Limited

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Hi Antony, the previous hearing report, in its drafted form was a recommendation to refuse consent. I would have to re write this however note that the District Plan takes a tougher stance now.

The application was a discretionary activity at lodgement.

Without undertaking a new assessment under s104 I will not know for sure if it will be a grant or refuse. However, the last application for rural sub with a 4ha balance (and one additional allotment) was refused consent earlier this year based on:

- s104(1)(b) - inconsistency with objectives and policies, and
- s104(1)(c) - District Plan integrity and Precedent. This means that there is a concern that other owners of small rural lots could rely on a grant of that application to progress their small lot subdivision (which is equally incompatible with the rural subdivision rules).

That applicant also had written approvals, and I think it was non HPL land.

At the moment the application needs to be heard to reach a decision. If written approvals are obtained the decision would likely be made under delegated authority but I will let Richard talk to this in case he sees it playing out a different way.

Kind regards
Nicola

From: Antony Vogt <antony@jsl.nz>
Sent: Monday, 13 October 2025 11:04 am
To: Nicola Laurenson <nicola@laurensonplanning.co.nz>; Richard Watkins <richard.watkins@npdc.govt.nz>
Subject: Re: 24 Te Arei Road - Popuanui Chickens Limited

Hey Nicola,

So, far so good! Hopefully you managed to get away by now.

Thank you for sending this through, I have forwarded on to the external consultant at AgFirst (whom is away this week). I will let you know what the outcome is and if they would like a Teams meeting.

Thank you for your transparency around NPDC's reluctance to grant, I understand that the Subdivision is technically inconsistent with the direction set out in the Part Operative District Plan as it is read today. However, given the circumstances surrounding the original application:

- Lodged prior to the proposed plan coming into effect
- RD Activity
- 1-Lot since dropped
- Assuming this thing passes the NPS-HPL and
- Written Approvals are forthcoming

Are you or [@Richard](#) able to provide an honest likelihood of this thing either:

- Going to a Hearing (which the client has expressed willingness)
- Mediation
- or just declined in general.

Thank You,

Cheers,

Antony Vogt | Planner | BEP | Int.NZPI
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From: Nicola Laurenson <nicola@laurensonplanning.co.nz>
Sent: Friday, October 10, 2025 10:31 AM
To: Antony Vogt <antony@jsl.nz>
Cc: Richard Watkins <richard.watkins@npdc.govt.nz>
Subject: RE: 24 Te Arei Road - Popuanui Chickens Limited

Hi Antony,

I hope you are having a great week. I was meant to fly north today but this fog has grounded everything. Spring is so unpredictable!

Regarding this consent application, we have now had the NPS assessment peer reviewed. I have attached this for you.

Mr Ford has said that he is able to have a Teams meeting to discuss the peer review if the author would find that helpful.

If the proposal is found to be consistent with the NPS that is good news, but it is important to remember that this is not the only consideration towards a decision and Council has signalled its reluctance to make a recommendation to grant consent when considering the provisions of the District Plan. I understand you are also still seeking the written approval from the neighbour.

Let me know how you want to proceed.

Kind regards,
Nicola

From: Antony Vogt <antony@jsl.nz>
Sent: Monday, 1 September 2025 2:34 pm
To: Nicola Laurenson <nicola@laurensonplanning.co.nz>
Subject: Re: 24 Te Arei Road - Popuanui Chickens Limited

Hey Nicola,

Thank you for having a read through. Yip, just about have the written approvals sorted and then will submit the remaining S92.

The client is still very keen to continue so if you want to send off for external review that would be super!

Thank you,

Cheers,

Antony Vogt | Planner | BEP | Int.NZPI
Prospero Place Stratford | + (029) 048 11006



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From: Nicola Laurenson <nicola@laurensonplanning.co.nz>

Sent: Monday, September 1, 2025 1:57 PM

To: Antony Vogt <antony@jsl.nz>

Subject: RE: 24 Te Arei Road - Popuanui Chickens Limited

Hi Antony,

I just wanted to give you a quick update on this, Council will likely send the NPS assessment for peer review/ assessment given the expertise for this matter is not inhouse. Therefore, at this point I cannot advise if Council are satisfied with the NPS-HPL Assessment. I understand you are still working on things at the background, so I don't want to jump the gun and send this off if there is still uncertainty that you want us to carry on processing. Please let me know and I can get the ball rolling once I hear from you.

Thanks
Nicola

From: Antony Vogt <antony@jsl.nz>

Sent: Wednesday, 20 August 2025 10:52 am

To: Nicola Laurenson <nicola@laurensonplanning.co.nz>

Subject: 24 Te Arei Road - Popuanui Chickens Limited

Hey Nicola,

Thank you for the call earlier.

Please see the discussed NPS-HPL Assessment attached as well as the latest S92 (which I believe is as far as it got officially) and the latest scheme plan we are working with.

If you could please help me by setting out the next steps assuming the following occurs, that would be great.

- I am meeting the client this week and have been assured the written approvals are forthcoming.
- Council is satisfied with the NPS-HPL Assessment.
- I provide the remaining point 3 in the S92.

Thank you,

Cheers,

Antony Vogt | Planner | BEP | Int.NZPI
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Our ref: 25063

4th November 2025

Nicola Laurenson

c/- New Plymouth District Council

Liardet Street

New Plymouth 4342

Application Ref: SUB21/47978,

Dear Nicola,



FURTHER INFORMATION REQUEST – POPUANUI CHICKENS LIMITED

Please find enclosed our responses to your request for further information with regards to Subdivision resource consent application SUB21/47978 for 24 Te Arei Road West, New Plymouth.

1.0 Clarification based on Submission Points.

While Rule RPROZ-S1 allows for habitable buildings up to 8 metres, and 12m for all other structures above ground level (i.e. hayshed's) as a permitted activity, it is proposed that the following occurs:

- Lot 3, shall be able to construct any new building or structure as deemed necessary for the continued safe operation of the poultry farm as outlined within the Permitted Activity rationale of the New Plymouth District Plan,
- Lots 1, 2 and 4 shall be able to construct any new dwelling, building or structure, beyond what exists currently that does not exceed a height of no more than 6 metres above the existing ground level as existed at the time of subdivision.

2.0 Response to submissions.

The submitter (*39 Te Arei Road West*) has now provided their written approval for the proposed development. This is a result of numerous design iterations resulting in the proposed design which incorporates:

- A total reduction of one lot to three Lots,
- Utilisation of a double crossing for Lots 1 & 2,

- Landscaping mitigation along the boundaries of Lot 1, 2 and 3.
- No build/trees > 4m covenant over the area contained within Lot 2 and 3.

This updated Scheme and Written Approval is provided in Appendix 1 to this response.

3.0 Proposed Conditions of Consent for SUB21/47978

The following are a list of suggested consent conditions to address the remaining issues and draw upon recommendations from Ms Dravitzki's LVIA and previous correspondence with regards this application.

Subject to the following conditions imposed under Section 108 of the Resource Management Act 1991:

1. The subdivision activity shall be carried out in accordance with the plans and all information submitted with the application, and all referenced by the Council as consent number SUB21/47978.
2. The application for a certificate under section 224(c) of the RMA shall be accompanied by certification from a professionally qualified surveyor or engineer that all the conditions of subdivision consent have been complied with and that in respect of those conditions that have not been complied with:
 - a. a completion certificate has been issued in relation to any conditions to which section 222 applies.
 - b. a consent notice has been or will be issued that in relation to any conditions to which section 221 applies.

Survey Plan Approval

3. The survey plan shall conform with the subdivision scheme plans submitted by Juffermans Surveyors Ltd and entitled "Lots 1 – 4 being a subdivision of Lot 4 DP 5842"; Job Number 205063, Rev D.

Building platforms and onsite stormwater disposal systems

4. An inspection and a report shall be carried out of soil compatibility by a suitably qualified person and submitted to the council to confirm the suitability of Lots 1 and 2 for on-site stormwater disposal.

5. A report shall be provided from a suitably qualified person to confirm that there is available within Lots 1 and 2 a stable flood free building platform suitable for building foundations in accordance with the requirements of the New Zealand Building Code – Acceptable Solution B1/AS4 of Approved Document B1/4; Structure Foundations.
6. Any recommendations requiring specific on-site stormwater and building platform shall be subject to Consent Notice under Section 221 of the Resource Management Act 1991.

Vehicle Entrance

7. A Type G vehicle crossing shall be constructed to service Lots 1, 2 and 3 to ensure maximum sight visibility to the west and east is achieved. Each crossing shall be constructed to the Standard specified in the Council's Land Development & Subdivision Infrastructure Standard.

Advice Note

An application with the appropriate fee shall be made to the Council for a new and or upgraded Vehicle Crossing, and upon approval the vehicle crossing is to be installed by a Council approved contractor at the applicant's cost.

Consent Notice on Lots 1 - 4

8. The consent holder or future owners of proposed Lots 1, 2, and 4 shall comply with the following:
 - a. All buildings on Lots 1, 2 and 4 shall be limited in terms of finish to exterior surfaces, this includes roofs and walls, recessive (shades rather than tints) and colours to have reflectivity values of below 20% for roofs and 40% for exterior walls.
 - b. All new driveways and accessways for Lots 1, 2 and 4 shall be finished in rural material and shall be a mid to dark grey in colour.
 - c. All buildings on Lots 1 and 2 shall be single storey and less than 6m in height.
 - d. Only one habitable building shall be constructed on Lots 1 and 2.
 - e. Any new habitable dwelling on Lot 4 shall be limited in size and scale to that of the current existing dwelling on site.
 - f. Water tanks on Lots 1, 2, and 4 shall be recessive shade less than 35% reflectivity and shall be integrated with the dwelling design and either screened or planted from the view from the road, if not located underground.

- g. All external lighting on Lots 1, 2 and 4 shall be hooded or cast down so that no lamp source is visible.
 - h. All earthworks on Lots 1, 2 and 4 shall include sediment control measures and be limited in height to 1.5m unless created at a batter of no steeper than three horizontal to one vertical. Any earthworks shall be grassed.
 - i. Fencing on Lots 1, 2 and 4 shall be limited to post and rail or post and batten only.
 - j. Habitable buildings on Lots 1, 2 and 4 shall be limited to the areas marked and defined on the survey plan.
9. The consent holder or future owners of proposed Lots 3 and 4 shall comply with the following:
- a) Riparian planting and fencing within Lots 3 and 4 along the length of the Waiongana River shall be retained, maintained, and enhanced on an on-going basis.
 - b) Any dead or diseased species within the riparian planting shall be replaced as soon as practicable within the next planting season.
 - c) Any damaged fencing along the riparian margins shall be replaced to ensure stock proof fencing permanently along the stream margins.
10. The consent holder or future owners of proposed Lots 1, 2, and 4 shall comply with the following:
- a. The landowner or occupier will not interfere or restrain activities from occurring on land surrounding the burdened land where those activities are permitted by, and carried out in accordance with, the District Plan, Regional Plans, or any replacement plans.
 - b. The landowners or occupier will not:
 - i) Make nor
 - ii) lodge nor
 - iii) Be party to nor
 - iv) Finance nor
 - v) contribute to the cost of;
 - vi) Any submission, proceeding or appeal designed or intended to limit, prohibit or restrict activities that are permitted and carried out in accordance with the District Plan or Regional Plans or any replacement plans.

11. The consent holder or future owners of proposed Lots 1 - 4 shall comply with the following: Each new dwelling shall be supplied with a dedicated firefighting water supply, and access to such supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008, which must thereafter be maintained.
12. The consent holder or future owners of proposed Lots 1 and 2 shall comply with the following:
 - a. All planting established in accordance with the Landscape Planting Plan [insert name + reference details of Landscape Planting Plan certified in accordance with Condition 16] shall be maintained by the owner and shall not be destroyed or removed.
 - b. The owner shall replace any dead or dying plants with the same species in accordance with the [insert name + reference details of Landscape Planting Plan] within the following planting season.
13. Condition 8 -12 above shall be the subject of a consent notice under Section 221 of the Resource Management Act 1991 registered against the new record of title for Lots 1 - 4 (where applicable) of the subdivision of Lot 4 DP 5842 as identified in the condition and shall be prepared by the Council at the cost of the consent holder.

Riparian Planting

14. Riparian planting and fencing shall occur along the length of the Waiongana River within Lots 3 and 4. TRC riparian guidelines 23, 24, 25, 26 and 41 shall be used as a guide to inform the fencing and planting plan.
15. Fencing shall be stock proof permanent fencing as per the Taranaki Regional Council (TRC) Guidelines.

Mitigation Planting

16. A Landscape Planting Plan prepared by a suitably qualified expert in landscaping shall be submitted by the consent holder to the Development Control Lead and certified prior to the commencement of works. The Landscape Planting Plan shall provide the following:
 - Road boundary planting along the frontage of Lots 1 and 2 to screen and or soften the future building platforms (as identified by condition 8).

- Planting along the driveways of Lots 1 and 2 to screen and or soften the views into the building platform locations from the road.
- Identification of existing vegetation to be retained until new planting achieves specific heights. The heights that the new planting must achieve before the existing vegetation can be removed shall be identified in the Landscape Planting Plan.
- Plant species, which must all be native varieties and include the numbers, size, spacing, layout and grade.
- Methods of ground preparation, fertilising, mulching, spraying.
- Maintenance and weed management.

All works shall be carried out in accordance with the Landscape Plan certified in accordance with this condition.

17. Prior to issue of certification under Section 224 of the Resource Management Act 1991, the consent holder shall complete planting in accordance with the Landscape Planting Plan certified in accordance with Condition 16.

18. In the event that application is made to the New Plymouth District Council for certification pursuant to Section 224 of the Resource Management Act 1991 before riparian planting and fencing under condition 14, 15, and the planting approved under Condition 16 is completed, then the consent holder shall pay to the New Plymouth District Council a bond in the form of a refundable cash deposit.

The purpose of this bond shall be for ensuring compliance with Condition 14, 15, 16 and 17 and shall only be entered into if the Council is satisfied that the amount of the bond is sufficient to achieve this purpose, and that 25% of the estimated cost for the maintenance period has been added.

References

Dravitzki, M. (2021). *LANDSCAPE AND VISUAL IMPACT ASSESSMENT FOR A FIVE LOT SUBDIVISION; 24 Te Arei Road West, New Plymouth.*

Quin, R. (2022). *Submission on a resource consent application subject to public or limited notification, SUB21/47978, Wayne Curry, 24 Te Arei Road West, New Plymouth, 5 Lot Rural Subdivision.*

Additional Assessment

In addition to the matters above, wider discussions surrounding this application have commented on “similar” surrounding applications being rejected under the following points and I would just like to use this formal response to provide a case for both on behalf of the client.

s104(1)(b) - Inconsistency with Objectives and Policies – It is acknowledged that the application as read today is inconsistent with the Objectives and Policies of the Rural Production Zone within the Proposed New Plymouth District – Part Operative Plan 2025. However, it is requested that this application be treated appropriately as it is materially different in that it was submitted under the old District Plan back in 2021, in which the application was accepted as a Discretionary activity for the number of Lots (5) proposed. Since then, this has been reduced to a total of four (4) Lots which would have carried the Restricted Discretionary activity status under that plan.

In this regard, we implore the processing of this application to consider the principles of natural justice in so far as the applicant has been undertaking an almost 5 year consenting journey which has been subject to both changes in Central and Local Government planning regulations to which was not on the fault of the applicant. Throughout this process the applicant has been incredibly fair and patient undertaking and facilitating extra expert evidence and mitigation wherever possible. This has resulted in an outcome that I am positive would have been accepted under the rules the original application was lodged under. As such, I implore you to use the discretion available to you to manage this unique situation as the effects have been proved to be minor and appropriately managed.

s104(1)(c) - District Plan Integrity and Precedent – As discussed above, this application is materially different to any applications which could be lodged in direct proximity to the site or indeed across the region as a whole. This is because all applications with similar non-complaint features will be processed as a non-complaint activity under the new plan which now has legal effect. Therefore, NPDC is easily able to be confident that it is able to appropriately reject these applications to protect the surrounding rural character and amenity. Therefore, no precedent is set by granting this application and the integrity of the plan maintained.

Please let me know if the information as set out satisfies your request for further information,

A. Vogt.

Antony Vogt | Planner | Juffermans Surveyors Ltd

M (029) 048 11006 | **E** antony@jsl.nz

Prospero Place, Stratford | PO Box 340, Stratford 4332



Appendix 1 - Updated Scheme and Written Approval



Te Kaunihera-ā-Rohe o Ngāmotu

New Plymouth District Council



FORM 8A

Written approval to an activity subject to a resource consent application

Please read the information on the back of this page before giving your written approval in respect of a resource consent application.

1. Affected person's details

1a. I am the Property owner Occupier

1b. Of the property at (street address)

1c. Full name
First name(s) Surname

1d. Electronic service address

1e. Telephone
Mobile Landline

1f. Postal address or alternative method of service under Section 352 of RMA 1991

1g. I have the authority to sign on behalf of all other owner/occupiers of the property Yes No

2. Resource consent application details

2a. Applicant's name
First name(s) Surname

2b. Site address

2c. Description of proposal

3. Documents and plans

I have read and/or seen:

- The full resource consent application, including:
 - The full description of the activity and the assessment of environmental effects (AEE).
 - Plan(s), signed by me and listed below. (If required, attach any additional plan information.)

Plan reference number	Plan title	Date
25063 - Rev D	Proposed Subdivision of Lot 4 DP 5842	09/10/2025

Please turn over

OFFICE USE ONLY

Date received Property ID Application #

Time received Land ID Document #

Received by

Liardet Street, Private Bag 2025, New Plymouth 4340, NZ, Telephone 06-755 6060, Email enquiries@npdc.govt.nz, Website www.npdc.govt.nz

4. Privacy statement

The Privacy Act 2020 applies to the personal information provided in this written approval. For the purposes of processing the resource consent application the Council may disclose this personal information to another party. If you want to have access to, or request correction of, this personal information, please contact the Council.

5. Affected person's declaration

By signing* this written approval, or by submitting this form electronically, I confirm that I understand the proposal and that the Council must decide that I am no longer an affected person and therefore must not have regard to any adverse effects on me.

I understand that I may withdraw my written approval by giving written notice to the Council before the hearing, if there is one or, if there is not, before the application is determined.

I confirm that the information contained in this written approval is true and correct, and agree to the disclosure of my personal information in respect of this written approval.

If signing on behalf of a trust or company, please provide additional written evidence that you have signing authority.

Kerry Neville Rawlinson

First name(s)

M. M. M.

Surname

17.10.25

Date

Signature of person giving written approval (or person authorised to sign on behalf of the person giving written approval)

*A signature is not required if you give your written approval by electronic means, however the plans do need to be signed.

6. Information for affected persons

1. Please ensure you fully understand the proposal before deciding whether to sign this form. You may need to ask for further information from the applicant.
2. There is no obligation to sign this form, and no reasons need to be given.
3. Conditional written approvals cannot be accepted.
4. If this form is not signed, the application may be notified and you may have the opportunity to submit on the application.
5. If the Council determines that the activity is a deemed permitted boundary activity under section 87BA of the Act, your written approval cannot be withdrawn.
6. It is acceptable for you to request that you be given some time to consider the application before deciding whether to provide your written consent or not. You may also obtain your own professional advice on the application e.g. from a lawyer, planner or surveyor before deciding whether or not to give your written approval.
7. 'An Everyday Guide to the RMA' on the Ministry for the Environment website at www.mfe.govt.nz contains useful information for affected persons.
If you have any further questions regarding this process contact the duty planner at the Council on 06-759 6060.



NOTES:
 1. Subject to Consent from the appropriate Territorial Authorities
 2. Area's and dimension's are subject to survey
 3. Plan prepared for consent purposes only and should not be relied upon for any other purpose without the consent of Juffermans Surveyors Ltd



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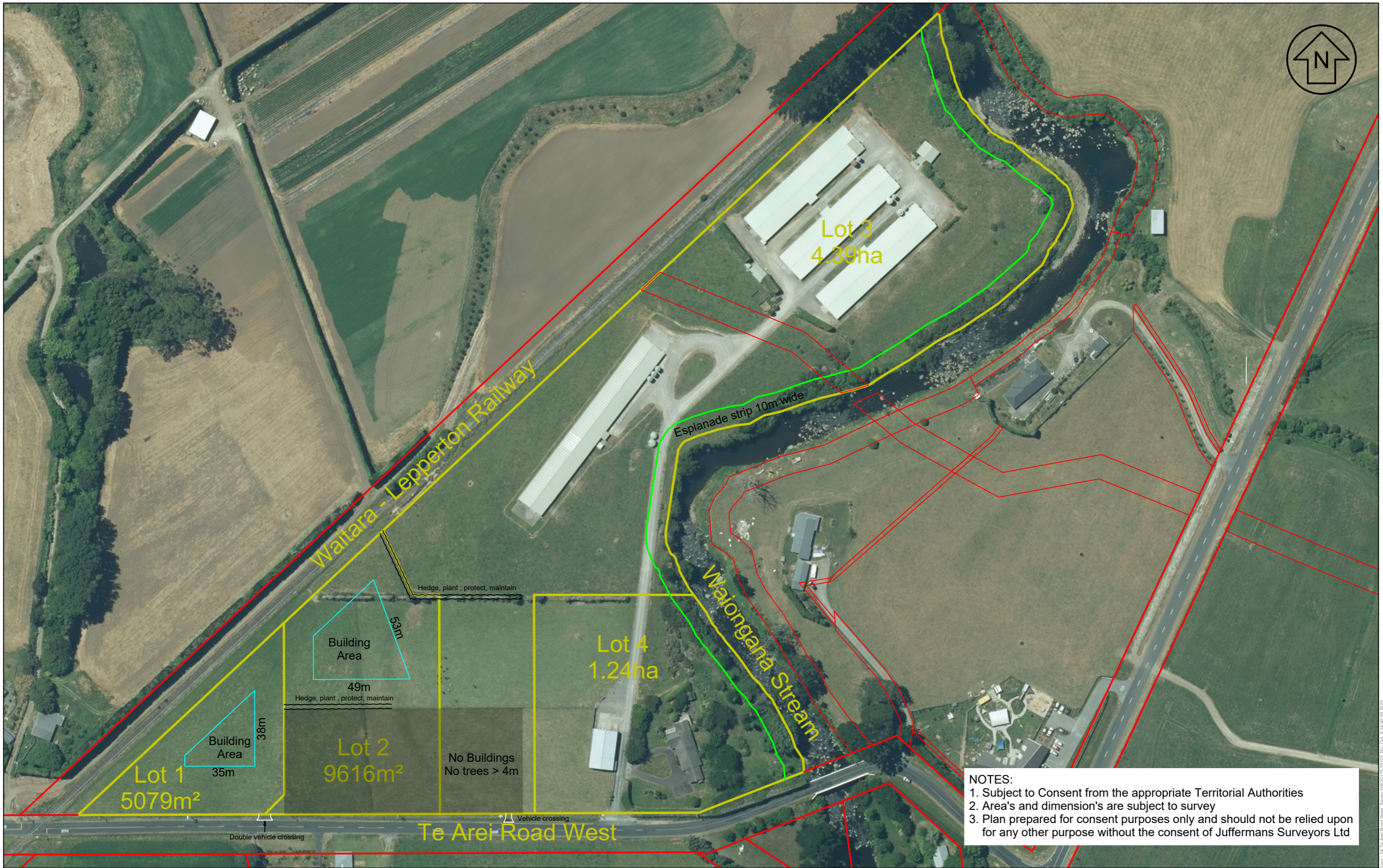
Rev.	Date	Revision Details	By	Ver.	App.

1:1750 @A3
 25063
 09/10/25

Proposed Subdivision of 24 Te Aroi Road West, Sentry Hill
 Lot 4 DP 5842 Scheme Plan

D *[Handwritten signature]*
[Handwritten signature]

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NOTES:

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2. Area's and dimension's are subject to survey
3. Plan prepared for consent purposes only and should not be relied upon for any other purpose without the consent of Juffermans Surveyors Ltd



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Rev.	Date	Revision Details	By	Ver.	App.

1:1750 @A3
25063
09/10/25

Proposed Subdivision of 24 Te Arai Road West, Sentry Hill
Lot 4 DP 5842 | Scheme Plan

D



Leading a
smarter, sustainable,
high performing
primary sector

NPS-HPL Assessment

Prepared for
Wayne & Susan Curry
Popuanui Chickens Limited

Branden Darlow
May 2025

Document Quality Assurance

Prepared by:	Branden Darlow Agribusiness Consultant	
Reviewed by:	Lauren McEldowney B. Ag Sci, MNZIPIIM Agribusiness Consultant	
Approved for release:	Lauren McEldowney B. Ag Sci, MNZIPIIM AgFirst Director	
Status:	Final	
Date:	30 th May 2025	
Revised:	31 st October 2025	

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1.0 Executive Summary

This report assesses the productive capacity and subdivision feasibility of the 7.1-hectare property at 24 Te Arei Road West, Waitara (Popuanui Chickens Limited), under the requirements of the National Policy Statement for Highly Productive Land (**NPS-HPL**).

Although the property is mapped as Land Use Capability (**LUC**) classes 2c3 and 3e2, qualifying it as Highly Productive Land (**HPL**), only 3.3 ha is confirmed as practically usable for land-based primary production following site-specific LUC mapping, slope analysis, and soil assessment. Meaning that most primary production uses that are suitable for the soils, location, and climate are economically and commercially unviable, mostly due to the capital investment required.

The property is constrained by several permanent and long-term constraints:

- Infrastructure restrictions, including a gas transmission pipeline corridor and overhead powerlines, which limit machinery access and land disturbance activities.
- Reverse sensitivity and biosecurity restrictions from an operational commercial poultry facility onsite (leased by Tegel), which limit access and proximity for other land-based activities.
- Lack of economic viability. The productive 3.3 ha would need to generate a return of \$5,636/ha/year in EBIT to service a standard 40% debt load at 5% interest, well above the regional average of \$3,354/ha for dairy \$2,105/ha for dairy grazing, and \$846/ha for finishing farms. With infrastructure development costs and limited water availability for horticulture, no form of traditional or alternative primary production is economically viable on the site over a 30-year period.
- Insufficient scale and physical isolation for viable horticulture, cropping, or livestock operations.
- Inability to amalgamate with neighbouring land due to surrounding roads, railways, and the Waiongana Stream.
- No viable lease or boundary adjustment options given land value and access issues.

The proposed subdivision, comprising four lots including the retention of the existing poultry operation, the existing dwelling and curtilage, and two rural lifestyle blocks, meets the criteria for exemption under Clause 3.10 of the NPS-HPL:

- There are permanent and long-term constraints on the land that render land-based primary production uneconomic for at least 30 years
- The subdivision does not result in significant loss or fragmentation of cohesive areas of HPL, as the site is already isolated and surrounded by fragmented rural-residential lots.

- Potential reverse sensitivity effects are mitigated, and buffers around the poultry operation have been incorporated and approved by Tegel.
- The environmental, social, and economic benefits of subdivision outweigh the marginal loss of productive capacity.

Given the constraints and lack of viable productive alternatives, the proposed four-lot subdivision meets the exemption criteria under the NPS-HPL. It will not result in a meaningful loss of productive capacity and will provide a practical and appropriate outcome for a highly constrained site.

2.0 Introduction

Wayne & Susan Curry (**The Applicants**) are proposing a four-lot subdivision on the property located at 24 Te Arei Road West, Waitara (**Subject Site**).

The 7.1 ha property (LOT 4 DP 5842 BLK III PARITUTU SD) is zoned in the Rural Production Zone in the New Plymouth District Council (**NPDC**) Proposed District Plan – Appeals Version - 2023¹.

The soils mapped at the property are classified under the New Zealand Land Resource Inventory (**NZLRI**²) as LUC 2c3 and 3e2. Land that is zoned rural and LUC 1 – 3 qualifies as Highly Productive Land (**HPL**) and is subject to the National Policy Statement for High Productive Land (**NPS-HPL**).

AgFirst Taranaki (**AgFirst**) has been engaged to undertake an assessment for the proposed four-lot subdivision against the NPS-HPL. This relates to an assessment on whether it is considered the four-lot subdivision meets the exemptions set out in Clause 3.10 of the NPS-HPL.

AgFirst is a suitably qualified agribusiness consultancy that has a wealth of experience in assessments relating to productive capacity, primary production and soil versatility.

AgFirst visited the property on 14th March to undertake this assessment.

3.0 Subject Site - LOT 4 DP 5842 BLK III PARITUTU SD

AgFirst visited the property on 14th March 2025 to understand the site and assess the productive capacity of the land regarding its permanent or long-term constraints. In addition, AgFirst assessed the highest and best use of the site regarding land-based primary production.

3.1 Site Overview

The subject site is located at 24 Te Arei Road West, Waitara, and has an area of approx. 7.1 ha, as shown in Figure 1 below.

The property includes residential improvements, four commercial chicken sheds leased by Tegel (approx. 5,100 m²), curtilage, and approx. 4.82 ha of grazed pasture. The site is physically isolated by the Waiongana Stream, Te Arei Road, and a railway line.

¹ <https://districtplan.npdc.govt.nz/eplan/property/6968/0/167? t=property>

² [New Zealand Land Resource Inventory \(NZLRI\) – Soil » New Zealand Soils Portal - Manaaki Whenua - Landcare Research](#)

3.2 Current Land Use

The subject site contains approx. 4.82 ha of effective pasture area, which is divided into five paddocks and is grazed by beef cattle. The remaining 2.28 ha is ineffective, comprising infrastructure, curtilage, and vegetation as identified in Figure 2.



Photos 1 & 2: Current land use of subject site



Photos 3 & 4: Current land use of subject site



Photos 5 & 6: Current land use of subject site



Figure 1: Subject Site



Figure 2: Ineffective (Non-Productive) area within the subject site

3.3 Site Description

The shape of the site is best described as irregular, with the eastern boundary shaped by the Waiongana Stream. The northeastern corner of the site has been subjected to some erosion as the stream has eroded at the toe of the landform, causing minor slumping and, over time, increasing the slope angle, resulting in rolling terrain toward this corner of the property. Vegetation, predominantly Gorse and Nightshade, has stabilised the soils in this area, and there are some native species currently establishing.

In the northern area of the site, toward the railway line, historic man-made depositions of soil and parent material are scattered, leaving the surface of the soil undulating, as shown in photo 3. These soils are anthropic and, as a result, have a significantly reduced productive potential.

Alongside the railway line on the western boundary, more soil disturbance has occurred where contour drainage has been constructed parallel to the westernmost poultry shed to manage surface water.

The southernmost commercial poultry shed's adjacent land has been subjected to earthworks, likely during the construction of the shed. These soils are classified as anthropic soils, depicted in Figure 5, and discussed in detail in Section 4 and in Section 10.1.2 of the Appendices.

Gorse and other weeds are present on the subject site, particularly in areas where soils have been disturbed, and on steep slopes along the Waiongana Stream. The site is also dissected in various places by amenities such as gas lines, overhead powerlines, and various water lines. Subject site amenities are shown in appendix 10.1.1.

3.4 Soils

The soils on the subject site are the New Plymouth black loam and New Plymouth sandy loam. These soils are orthic allophanic soils developed on andesitic tephra. Allophanic soils have high phosphate retention (anion storage capacity greater than 80%), resulting in high amounts of phosphate required to maintain and lift Olsen P, and they have low natural fertility³. They have low bulk density, resulting in little resistance to potential root penetration⁴.

³ NZLRI development » New Zealand Soils Portal - Manaaki Whenua - Landcare Research

⁴ Molly L., The Living Mantle. Mallinson Rendel Publishers Ltd, NZ; 1988

3.5 Land Use Capability

The NZLRI Land Use Capability (**LUC**) database⁵ identifies the subject site as LUC units 2c3 (approx. 5.65 ha) and 3e2 (approx. 1.45 ha) as shown in Figure 3 and described in Table 1 below. Both LUC units 2c3 and 3e2 are classed as highly productive under the NPS-HPL.

The NPS-HPL does not provide a pathway to reclassify soils, however, the potential uses for land-based primary production are limited by the physical characteristics of the land. AgFirst visited the site to map the soils at a 1:10,000 scale to assess the productive potential and potential uses of the subject site.

The NZLRI LUC maps in New Zealand are mapped at a 1:50,000 scale⁶, meaning that 1 cm on the map equates to approx. 500 m on the ground, potentially capturing areas of land that may be outside of the parameters defined by a LUC unit.

Recent LiDAR (light detection and ranging) technological developments, slope and elevation data have been spatially referenced at a scale of 1:1,000 or 4 - 8 pulses per m², providing high resolution accuracy for identifying slope and elevation⁷, factors that influence the productive potential of the land. LiDAR for the subject site is shown in Figure 4 below.

Table 1: NZLRI Land Use Capability unit descriptions for the subject site⁸

Unit	Unit Description	Slope	Potential Land Use	Grazing su/ha	Soil Name
2c 3	Flat to undulating slopes with yellow-brown loam soils developed on deep andesitic tephra occurring in Taranaki, where rainfall is between 1,600 and 2,000 mm p.a.	A	Intensive grazing incl. dairying. Cereal cropping. Shelter belts needed.	25	New Plymouth black loam.
3e 2	Undulating to rolling downlands in Taranaki with yellow-brown loam soils developed on andesitic tephra. Rainfall is less than 2,000mm p.a. There is potential for slight to moderate sheet and rill erosion when cultivated	B+C, C	Intensive grazing incl. dairying. Horticulture. Cereals. Root and green fodder crops. Shelter belts needed.	21	New Plymouth sandy loam.

⁵ NZLRI Land Use Capability 2021 | LRIS Portal

⁶ Taranaki LiDAR 1m DSM (2021) | LINZ Data Service

⁷ Taranaki LiDAR 1m DSM (2021) | LINZ Data Service

⁸ [Taranaki - Manawatu Region: Land Use Capability Extended Legend - Land Use Capability \(LUC\) archive - Manaaki Whenua Landcare Research Digital Library](#)



Figure 3: Land Use Capability

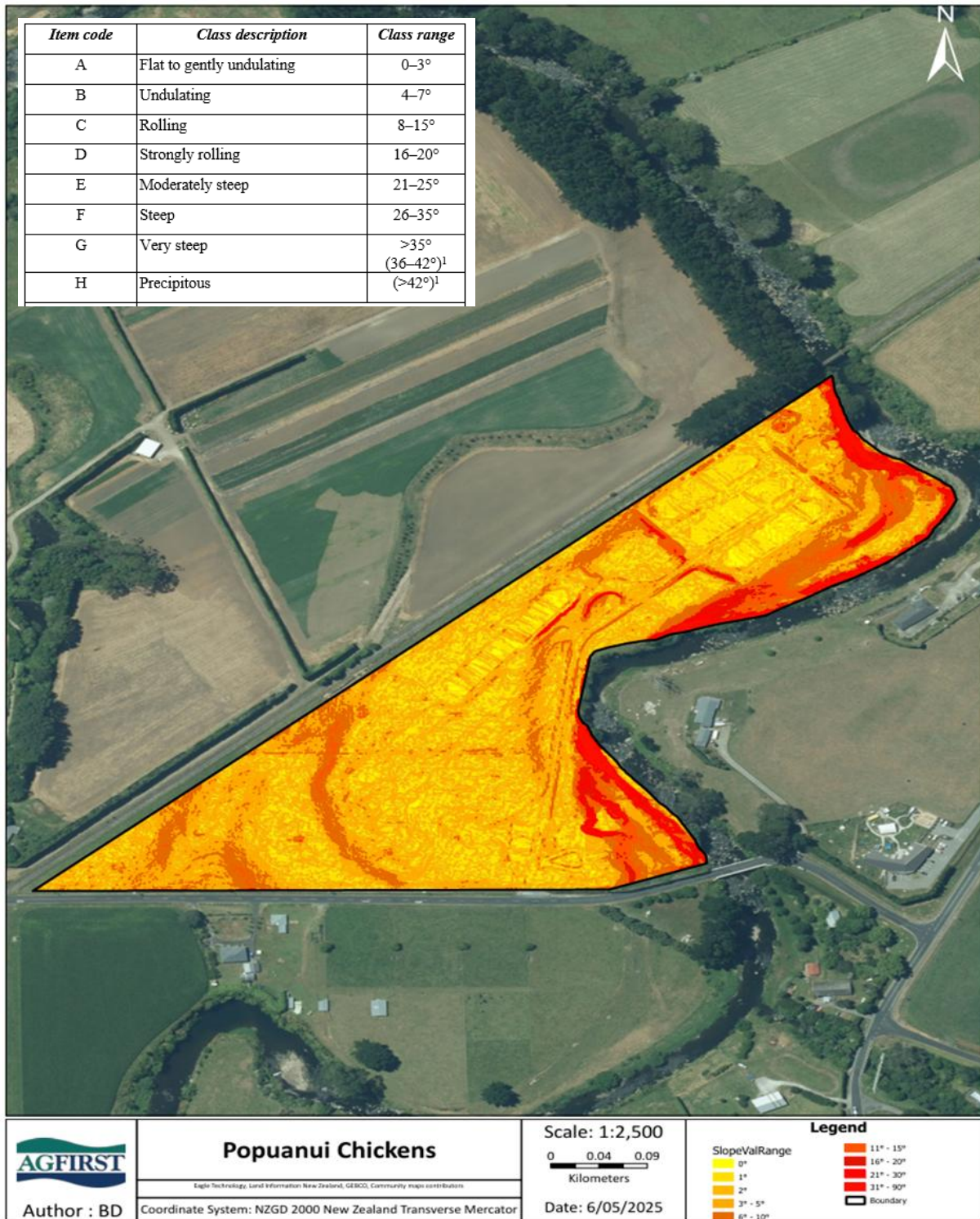


Figure 4: 1m DEM Lidar⁹ of the subject site & NZLRI slope classification¹⁰

⁹ Taranaki LiDAR 1m DEM (2021) | LINZ Data Service

¹⁰ LRIS Data Dictionary - v3 | LRIS Portal

4.0 Site Specific LUC & Soils Assessment

The NZLRI LUC maps are not intended for farm-scale interpretation. Accordingly, Branden Darlow of AgFirst conducted a soil assessment of the subject site to inform the assessment of productive capacity. Branden is trained in LUC mapping and previously worked as a soil conservator with the Taranaki Regional Council. The assessment followed accepted guidelines (Milne et al., 1995; Lynn et al., 2009), and the results are presented in Table 2 and Figure 5 below.

Table 2: Site-specific LUC assessment

Map Unit	Description	Slope	Parent Material	Soil	Erosion	Mottles %	Area (ha)
1	Sandy clay loam moderately developed on andesitic tephra, dark brown in colour to a depth of ~17 cm.	C+B	Ash	Sandy Clay Loam	Nil	<2%	0.7
2	Sandy clay loam well developed on andesitic tephra, dark brown in colour to a depth of ~15 cm.	B+C	Ash	Sandy Clay Loam	Nil	<2%	1.4
3	Sandy clay loam moderately developed on andesitic tephra, dark brown in colour to a depth of ~23 cm.	A+B	Ash	Sandy Clay Loam	Nil	<2%	1.2
4	Sandy clay loam moderately developed on andesitic tephra, brown in colour to a depth of ~19 cm.	C	Ash	Sandy Clay Loam	Nil	<2%	0.7
5	Sandy clay loam moderately developed on andesitic tephra, dark brown in colour to a depth of ~12 cm.	D+E	Ash	Sandy Clay Loam	Slight Sheet	<2%	0.9
6	Sandy clay loam moderately developed on andesitic tephra, dark brown in colour to a depth of ~12 cm.	F	Ash	Sandy Clay Loam	Historic soil slips now stable	<2%	0.1
7	Sandy clay loam to a depth of approximately 7 cm. Mixed with parent material and a small percentage of gravels present. Peds are irregular in shape and range in chroma within the pit. Pits vary significantly in potential rooting depths, possibly due to compaction.	A+B	Ash	Sandy Clay Loam	Nil	>25%	0.4
8	Sandy clay loam moderately developed on andesitic tephra, approximately 50% mottles observed within the pits, slightly gravelly.	B	Ash & unconsolidated gravels	Sandy Clay Loam	Nil	25-50%	0.1



Figure 5: Site-specific soil map

4.1 Overview of Soil Limitations

Site-specific soil map units are shown in Figure 5 and summarised in Table 2. A detailed description is provided in section 10.1.2 in the appendices. The site comprises approx. 3.3 ha of generally flat to undulating land with versatile soils suitable for a range of productive uses. While Unit 3 (approx. 1.2 ha) may fall within the parameters of Class 2 land, at a finer mapping scale (1:10,000), it would likely be encompassed within Map Units 1 and 2. The remainder of the site is constrained by slope, anthropic disturbance, and drainage limitations, which collectively reduce the extent of land that can support potential land based primary production.

The majority of the site's productive land aligns with LUC 3e2, which has an estimated pasture production potential of 11,550 kg DM/ha, and is considered representative of the site's overall productive capacity.

In summary, approximately 3.3 ha of the subject site aligns with LUC 3e2 and has potential for land-based primary production, as shown in Figure 7. The remaining 3.8 ha is not considered productive due to the physical and soil constraints outlined above. Table 3 summarises the non-effective, productive, and non-productive areas of the site.

Table 3: Map unit summary

Map Unit	Area (ha)	Non-Productive		Productive	
		Non-Effective	Productive Area	Non-Productive Area	
1	0.7	-	0.7	-	
2	1.4	-	1.4	-	
3	1.2	-	1.2	-	
4	0.7	0.1	-	0.6	
5	0.9	0.4	-	0.5	
6	0.1	0.1	-	-	
7	0.4	0.1	-	0.3	
8	0.1	-	-	0.1	
<i>Non-Effective</i>	1.6	1.6	-	-	
Total	7.1	2.3	3.3	1.5	



	<h3>Popuanui Chickens</h3>	Scale: 1:2,500 	Legend HPL Area
	<small>Eagle Technology, Land Information New Zealand, GBCO, Community maps contributors</small> Author : BD	Coordinate System: NZGD 2000 New Zealand Transverse Mercator	Date: 19/05/2025

Figure 6: Area of HPL on subject site

4.2 Area Suitable for Land-Based Primary Production

As discussed, and outlined above, approx. 3.3 ha of the subject site, upon a site-specific LUC map in Figures 5 & 6, is identified as a cohesive landform with productive and versatile soils. Based on the available information, the highest and best use of the site is dairy heifer grazing. The property is too small to support a viable dairy or cropping system, and no alternative land-based primary production options are economically feasible.

To assess the economic viability of land-based primary production, property data from the Taranaki Regional Council was reviewed, with land value used to indicate the profitability required to service typical farm debt. Assuming a debt loading of 40% and a long-term average interest rate of 5%, a total EBIT of approximately \$18,600 per year would be needed to meet standard lending requirements. This equates to \$2,620 per hectare across the total property area. However, as only 3.3 ha is available for productive use, the land would need to generate an EBIT of \$5,636 per hectare per year. The economic analysis is covered in detail in section 8.1.1.3.

At an estimated productivity of 11,550 kg DM/ha, the site would generate an economic output of around \$2,105 per hectare under a dairy heifer grazing system, representing the most realistic use of the land. This use therefore reflects the highest and best economic outcome achievable given the property's scale and productive limitations. However, this does not return the required \$5,636/ha/year of EBIT.

5.0 Potential Future Land Use

The subject site comprises approx. 3.3 ha of versatile Class 1 – 3 land, which is theoretically capable of supporting a range of land-based primary production activities. An assessment of both livestock and horticultural options was undertaken to determine the highest and best use of the land, considering its physical characteristics, scale, infrastructure requirements, and economic feasibility which is shown in appendix 10.1.3.

In terms of livestock potential, regional benchmarks from DairyNZ¹¹ and Statistics New Zealand¹² were used to evaluate the suitability of dairy, dairy support, beef, and sheep systems. The analysis showed that while the land could support nine dairy cows at the average Taranaki stocking rate, the area required for essential infrastructure, such as the farm dairy, effluent system, and races, would significantly reduce the productive area. Establishing and operating a commercial dairy system on a block of this size would not be economically viable.

Dairy support grazing presented the most practical scenario due to minimal infrastructure requirements. However, when feed production, utilisation efficiency, and operating costs were considered, the modelled return still resulted in a net financial loss. Similarly, the scale of the site would only support around six beef animals or twenty-eight sheep, well below the levels needed for sustainable commercial farming.

¹¹ <https://www.dairynz.co.nz/resources/resource-list/dairynz-economic-survey-2023-24/>

¹² <https://www.stats.govt.nz/publications/?filters=Agricultural+production+statistics%2CInformation+releases>

Consequently, none of the assessed livestock enterprises were considered economically viable at the existing scale.

The horticultural potential of the land was also examined. While the site's soils and climate could support a variety of horticultural crops, its limited area and amenity constraints restrict the options available for commercial use. Most uncovered crops, such as maize or carrots, require a minimum of five hectares for commercial viability, while kiwifruit and avocado production generally require between four and five hectares for owner-operated systems, with larger areas needed for managed commercial operations. High-value crops such as hops or hemp were discounted due to the significant land area and capital investment required. Additionally, water availability presents a major constraint, as reliable irrigation is essential for most horticultural ventures. The costs associated with investigating and developing groundwater sources for irrigation, often exceeding \$100,000, would be disproportionate to the potential returns from a property of this scale.

Overall, while the site contains versatile soils capable of supporting a range of productive land uses, its small size, infrastructure and water limitations, and associated economic constraints prevent it from supporting commercial-scale agricultural or horticultural production. The highest and best use of the land is therefore limited to low-intensity pastoral or lifestyle purposes, potentially incorporating small-scale grazing or niche horticultural activities undertaken for non-commercial or supplementary income purposes.

6.0 Proposed Subdivision

The proposal seeks to subdivide the current land parcel into four lots, the existing house and curtilage (Lot 4 – approx. 1.2 ha), retaining the existing poultry operation (Lot 3 – approx. 4.4 ha), and two rural lifestyle lots (Lot 1 – approx. 0.51 ha and Lot 2 – approx. 0.96 ha) as shown in Figure 7 below.

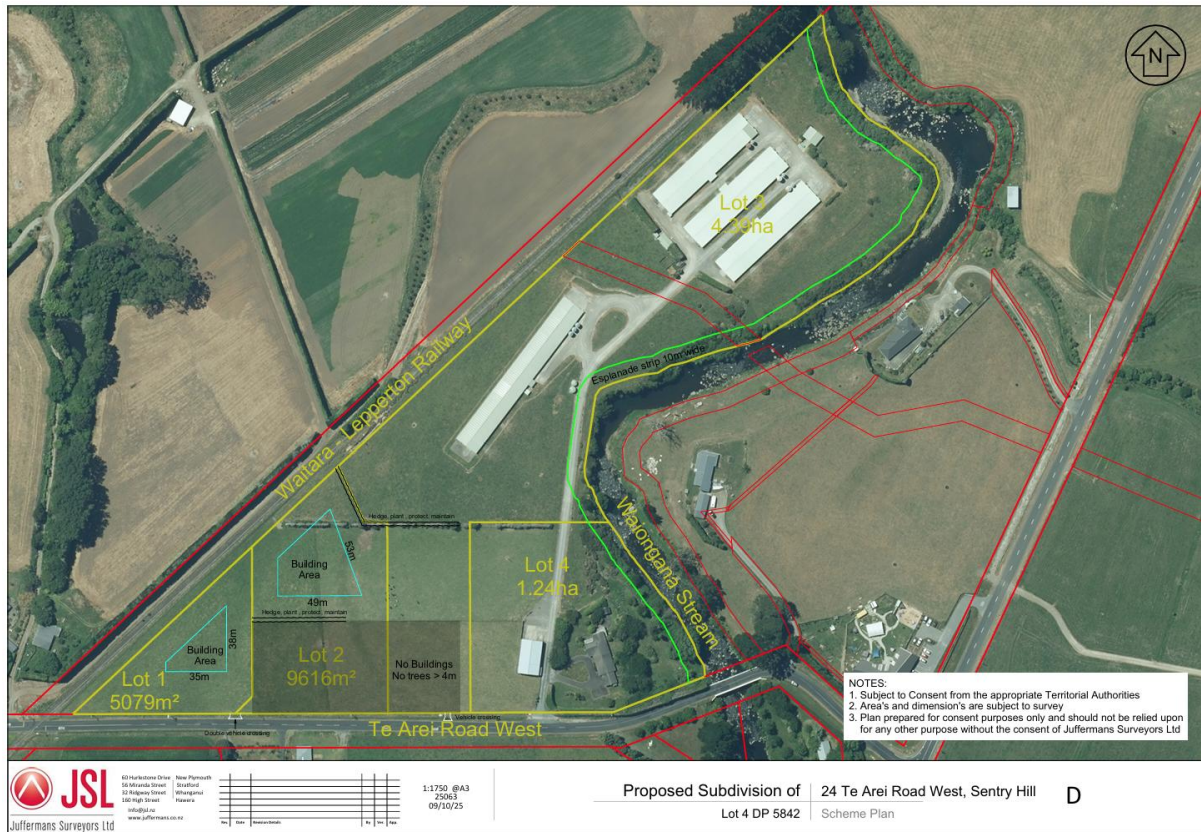


Figure 7: Proposed Subdivision

The proposed subdivision includes sufficient buffers for the existing poultry operation and has provisions (no building/tree zone) for surrounding property owners and Tegel's approval. An easement has also been considered to protect the access for activities relating to the existing poultry operation. There are also residential homes within 80 m of the operation that have recently been consented to. With the predominant wind direction in the Taranaki region being from the west, it is seen that any effects from this activity, such as odours, will have minimal effect on the proposed dwellings. Although the setback exceeds the standard 400 m requirement under Rule RPROZ-S2 of the New Plymouth District Plan, written approval from Tegel has been obtained for the proposal.

7.0 Regulatory Framework

7.1 National Policy Statement – Highly Productive Land

In September 2022, the Ministry for the Environment (MfE) and the Ministry for Primary Industries (MPI) released the National Policy Statement for Highly Productive Land (NPS-HPL). The objective of this document “is *Highly productive land is protected for use in land-based primary production, both now and for future generations.*”

Land-based primary production means *production, from agricultural, pastoral, horticultural, or forestry activities, that is reliant on the soil resource of the land.*

Productive capacity, in relation to land, means *the ability of the land to support land-based primary production over the long term, based on an assessment of:*

- a. physical characteristics (such as soil type, properties, and versatility); and*
- b. legal constraints (such as consent notices, local authority covenants, and easements); and*
- c. the size and shape of existing and proposed land parcels*

Clause 3.10 sets out the exemptions for development of highly productive land subject to permanent or long-term constraints. The exemptions are listed below:

3.10 Exemption for highly productive land subject to permanent or long-term constraints

1. Territorial authorities may only allow highly productive land to be subdivided, used, or developed for activities not otherwise enabled under clauses 3.7, 3.8, or 3.9 if satisfied that:
 - a. there are permanent or long-term constraints on the land that mean the use of the highly productive land for land-based primary production is not able to be economically viable for at least 30 years; and
 - b. the subdivision, use, or development:
 - i. avoids any significant loss (either individually or cumulatively) of productive capacity of highly productive land in the district; and
 - ii. avoids the fragmentation of large and geographically cohesive areas of highly productive land; and
 - iii. avoids if possible, or otherwise mitigates, any potential reverse sensitivity effects on surrounding land-based primary production from the subdivision, use, or development; and

- c. the environmental, social, cultural and economic benefits of the subdivision, use, or development outweigh the long-term environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production, taking into account both tangible and intangible values.
2. In order to satisfy a territorial authority as required by subclause (1)(a), an applicant must demonstrate that the permanent or long-term constraints on economic viability cannot be addressed through any reasonably practicable options that would retain the productive capacity of the highly productive land, by evaluating options such as (without limitation):
 - a. alternate forms of land-based primary production:
 - b. improved land-management strategies:
 - c. alternative production strategies:
 - d. water efficiency or storage methods:
 - e. reallocation or transfer of water and nutrient allocations:
 - f. boundary adjustments (including amalgamations):
 - g. lease arrangements.
3. Any evaluation under subclause (2) of reasonably practicable options:
 - a. must not take into account the potential economic benefit of using the highly productive land for purposes other than land-based primary production; and
 - b. must consider the impact that the loss of the highly productive land would have on the land holding in which the highly productive land occurs; and
 - c. must consider the future productive potential of land-based primary production on the highly productive land, not limited by its past or present uses.
4. The size of a landholding in which the highly productive land occurs is not of itself a determinant of a permanent or long-term constraint.
5. In this clause:

landholding has the meaning in the Resource Management (National Environmental Standards for Freshwater) Regulations 2020.

long-term constraint means a constraint that is likely to last for at least 30 years.

8.0 Assessment Against NPS-HPL

The subject site, according to NZLRI LUC maps, is classified as LUC units 2c 3, and 3e 2. In theory, this means the site has the potential for a wide range of primary production uses. However, in practice, permanent and long-term constraints reduce the overall versatility of the site.

8.1 Assessment Against NPS-HPL Clause 3.10 (1)(a)

8.1.1 Permanent or Long-Term Constraints

The subject site is subject to multiple permanent and long-term constraints that significantly limit the site's capacity for viable land-based primary production.

8.1.1.1 Restrictions on Land Use Opportunities

The subject site has several service amenities in various locations as outlined in Figure 3. This poses restrictions on what activities can occur on the land which are detailed below.

Gas Transmission Pipeline & Pipeline Corridor

A long-term constraint is that a gas transmission pipeline and pipeline corridor is located on the subject site as identified in the NPDC Proposed District Plan¹³ shown in appendix 10.1.1 and Figure 8 below.

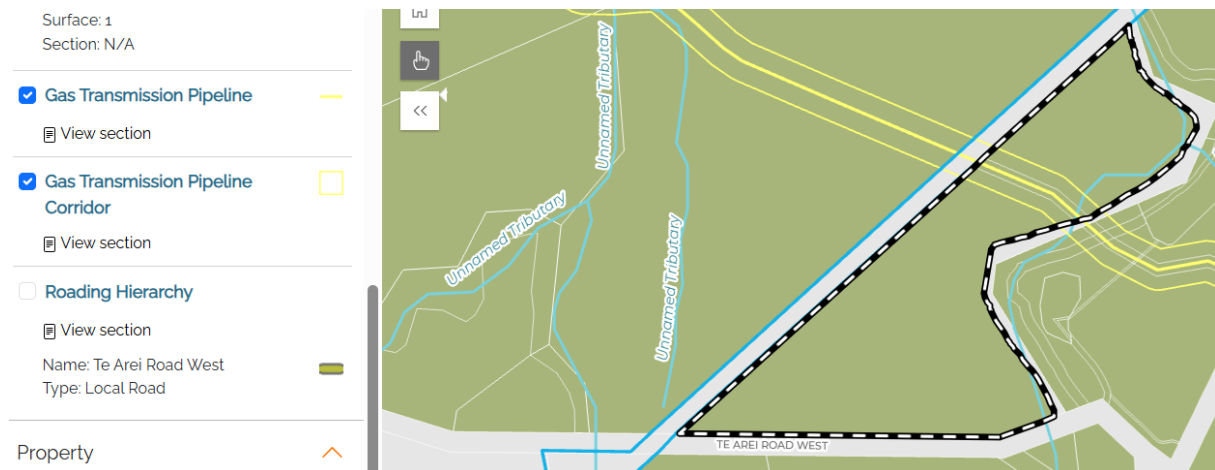


Figure 8: Gas transmission pipeline and corridor

The gas line easement corridor covers an area of approx. 0.17 ha, and the pipeline is located within a registered easement on the land, which provides rights of access and pipeline management concerning the landowner's activities. This easement is 12 m wide, generally extending 6 m on either side of the centre of the pipeline.

¹³ <https://districtplan.npdc.govt.nz/eplan/property/6968/0/167? t=property>

NU-R39¹⁴ (land disturbance within the gas transmission pipeline corridor) states that:

Activity status: PER

Where:

1. the is undertaken as part of normal agricultural, horticultural or domestic [cultivation](#) activities, or the [maintenance and repair](#), including sealing of a [road](#), [footpath](#), [driveway](#) or farm track;
2. the maximum excavation depth is 400mm; and
3. the stability or integrity of the [gas transmission pipeline](#) is not compromised.

Note:

1. If a resource consent application is made under this rule, the owner and operator of the [Gas Transmission Pipeline](#) will be considered an affected person in accordance with Section 95E of the [Act](#) and notified of the application, where written approval is not provided.

Activity status where compliance not achieved: RDIS

Matters over which discretion is restricted:

1. Effects on the stability or integrity of the [gas transmission pipeline](#).
2. The risk of hazards affecting public or individual safety and the risk of property damage.
3. Measures proposed to avoid or mitigate potential adverse effects on the [gas transmission pipeline](#).
4. The outcome of any consultation with the owner and operator of the [gas transmission pipeline](#).

NU-R40¹⁵ (earthworks within the gas transmission pipeline corridor not covered by NU-R39) states that:

Activity status: PER

Where:

1. the stability or integrity of the [gas transmission pipeline](#) is not compromised; and
2. except for [earthworks](#) undertaken by a [network utility operator](#) within a [road reserve](#), the [earthworks](#) do not involve:
 - a. any permanent [alteration](#) to the profile, contour or [height](#) of the land within the corridor; or
 - b. the planting of [trees](#) within 10m of the [gas transmission pipeline](#); and
3. for any works within a gas pipeline easement area, a Pipeline Easement Permit is obtained and a copy of the permit is provided to the [Council](#) prior to the commencement of the works; or

¹⁴ <https://districtplan.npdc.govt.nz/eplan/rules/6968/17/0/12898/0/167>

¹⁵ <https://districtplan.npdc.govt.nz/eplan/rules/6968/17/0/12898/0/167>

4. for any works outside of a gas pipeline easement area, written advice of the work is provided to the [gas transmission pipeline](#) owner and operator at least 15 working days prior to the commencement of the works.

Note:

1. If a resource consent application is made under this rule, the owner and operator of the [Gas Transmission Pipeline](#) will be considered an affected person in accordance with Section 95E of the [Act](#) and notified of the application, where written approval is not provided.

Activity status where compliance not achieved: RDIS

Matters over which discretion is restricted:

1. Effects on the stability or integrity of the [gas transmission pipeline](#).
2. The risk of hazards affecting public or individual safety and the risk of property damage.
3. Measures proposed to avoid or mitigate potential adverse effects on the [gas transmission pipeline](#).
4. The outcome of any consultation with the owner and operator of the [gas transmission pipeline](#).

Gas transmission pipelines in New Zealand were originally designed to suit the rural or urban environments they were placed. However, as rural areas have become increasingly urbanised, new risks have emerged that these pipelines were not built to handle. These include excavation, heavy machinery, building encroachment, and hazardous activities near the pipeline, all of which increase the risk and potential consequences of failure¹⁶.

Firstgas¹⁷ recognises that a 60 m setback is unrealistic in the context of New Zealand however, it is recommended that activities and developments should not occur within a 20 m setback from the centre of the gas line.

Any form of land-based primary production would require infrastructure (particularly horticulture). This would mean that land disturbance and earthworks would need to be undertaken. Land disturbance and earthworks required for infrastructure development for land-based primary production would not meet the permitted activity status outlined in rules NU-R39 and NU-R40 above and is unlikely that resource consent would be granted. This is a long-term constraint that cannot be overcome.

¹⁶<http://www.epa.govt.nz/assets/Uploads/Documents/Fast-track-consenting/Drury-East/invitations-to-comment-/comments-received/08Mar22-Firstgas-FTC51-Comments-Received.pdf>

¹⁷ [Firstgas GasPipelineSafetyGuide A6 spreads digi.pdf](#)

Commercial Poultry Farm

Whilst the commercial poultry operation is not recognised as land-based primary production due to the nature of the activity not requiring the soil as a resource, in the case of this proposal, the primary production of this activity places risks and restrictions on the land-based activities that occur on the land within the subject site.

Entry is of vehicles, public, and people who have been in contact with industries that pose risks for zoonotic diseases is restricted. New Zealand encountered its first HPAI (high pathogenicity avian influenza) outbreak recently. MPI and the poultry industry have been successful in managing the outbreak.

This poses risks for the potential to spread to other animals and people¹⁸. Therefore, given that the existing operation is intended to continue, these restrictions it on the activities and uses of the land surrounding the commercial poultry operation are a long-term constraint that cannot be overcome.



Photo 6: Restricted Access

Discharge of Poultry Effluent

The property is currently consented (Consent 4131-2), shown in section 11.3 in Appendices, to discharge untreated poultry effluent from the cleaning of the broiler sheds by spreading it to land. The current operation does not produce significant amounts of effluent that is discharged to land, however, there are risks associated with the produce from animals and crops grown on areas of land where untreated effluent is applied.

¹⁸ createsend.com/t/d-9A8F9AFD857D23672540EF23F30FEDED

Power Lines

The subject site is dissected by an overhead powerline, which covers approx. 0.25 ha. This poses hazards for agricultural machinery. WorkSafe New Zealand recommends that risk management plans should ensure that no machinery or people are to come within 4 m of power lines¹⁹. Tree species are also restricted. A 9 m setback is required for medium-sized trees²⁰ such as avocados, macadamias, and some varieties of apple trees. Therefore, the power lines pose a long-term constraint for land-based primary production uses such as horticulture.

8.1.1.2 Non-Reversible Land Fragmentation

The subject site is geographically isolated from cohesive areas of productive land, with all immediately adjacent land being physically separated from the subject site by the railway line, Te Arei Road, and the Waiongana Stream. There are several small rural residential lifestyle blocks surrounding the subject site that have fragmented large and cohesive areas of HPL.

The constraint of land fragmentation is permanent, and it is not reasonably practical to consider that this could be rectified. The parcel itself has many limitations including fragmentation, geographical isolation and general lack of scale.

8.1.1.3 Economic Viability

To understand the lack of economic viability of the property for land-based primary production, property information from the Taranaki Regional Council has been obtained and is shown in Table 4 below. The land value has been used rather than the improvement and capital value to understand the profitability required for a land-based primary production business to service the relative level of debt. For this assessment, debt loading has been assessed at 40%, which is typical for farm lending. Interest rates have been assumed as a long-term average of 5%.

Table 4: Economic Viability

	Area (ha)	Land Value (\$ Total)	Land Value (\$/ha)	Interest (\$ Total)	Interest (\$/ha/year)	EBIT Required (\$/ha/year)
LOT 4 DP 5842 BLK III PARITUTU SD	7.1	\$930,000	\$130,986	\$18,600	\$2,620	\$2,620
Productive Area	3.3					\$5,636

Any land-based primary production business would need to generate a total EBIT (earnings before interest and tax) of \$18,600 per year to service typical debt levels. This is \$2,620/ha/year based on the total area of the property.

However, as discussed in section 4 there is only 3.3 ha available of potential productive area for land-based primary production. Therefore, \$5,636/ha/year of EBIT would need to be generated on the productive area.

¹⁹ [281WKS-6-energy-safety-electricity-overhead-Power-lines.pdf](#)

²⁰ [Plan before you plant – PowerNet](#)

The average EBIT for an average-sized Taranaki dairy farm is \$3,354/ha/year²¹, and for a Western North Island Class 5 finishing farm, \$846/ha²². While the identified highest and best use of the land is dairy heifer grazing with an annual return of \$2,105 per ha. The cost of debt servicing, combined with the area of the subject site, results in suitable primary production uses not being economically or commercially viable for at least 30 years.

8.2 Assessment Against NPS-HPL 3.10 (2)

Alternative Forms of Land Based Primary Production

Alternative forms of land-based primary production, such as horticulture, mixed arable cropping, commercial vegetable, or commercial livestock operations would not be feasible on the property as discussed in section 5 and appendix 10.1.3. This is due to the small scale of productive land with only 3.3 ha available for land-based primary production purposes, and the non-reversible land fragmentation that has occurred in the past.

Economically, the landholding is not commercially viable for any traditional forms of land-based primary production over 30 years as discussed. The capital investment required for horticulture, the scale needed for livestock enterprises, and water availability limitations would also be beyond what is considered a reasonably practicable option, considering the significant constraints to overcome and collectively, restrict the potential uses for land-based activities to occur on the subject site.

Improved Land-Management Strategies

The major constraints facing the site including irreversible land fragmentation, small scale and shape of the parcel cannot be overcome with improved land management strategies.

All reasonably practicable options have been assessed to demonstrate that the permanent and long-term constraints on economic viability cannot be addressed to retain productive capacity.

Alternative Production Strategies

The size does not allow for alternative land based primary production or diversification. There are no feasible or suitable options for alternative production strategies. There are no alternative options that would be significant enough to lift profitability to an economically viable level.

There is also the issue of sensitive receptors, given the residential and lifestyle blocks immediately surrounding the site. With horticultural operations, there are issues with sprays and noise from frost protection, while dust can be an issue for arable operations following cultivation and harvest events.

²¹ [7 Owner Operator: Regional and Systems Financial Analysis | EFS_2022-23_book.knit](#)

²² [SQtile WNI NSO 2425.xlsx](#)

Water Storage & Efficiency Methods

Water efficiency or storage methods is not a relevant solution, as there are no suitable land-based primary production options that require freshwater irrigation. Therefore, a feasibility study for water availability has not been undertaken.

Water is required for stock drinking; however, this is already assumed to be available for due to the property having beef cattle.

Re-Allocation or Transfer of Water & Nutrient Allocations

Reallocation or transfer of water and nutrient allocations is also not a relevant option, as the site is not located within a controlled nutrient region and a nutrient cap does not apply. Additionally, water for the land-based primary production uses available to the site is not a limiting factor.

Boundary Adjustments (Incl. Amalgamation)

The consideration of boundary adjustments (including amalgamations) is not a reasonably applicable option. Surrounding land parcels are physically separated by a road, a railway line, and the Waiongana stream. Merging parcels of land to overcome the size restraints would not be possible without major infrastructure developments, such as bridges or underpasses. The railway line could allow for cattle to cross, however, heavy machinery could damage or become damaged by crossing the tracks to adjacent land, it also poses additional risks to people working on the land.

There are some requirements for fencing standards for livestock, as well as risks for people and vehicles crossing the tracks²³. Although this does not pose a limitation on the land within the subject site, it does restrict the possibilities for joining geographically cohesive areas to expand potential enterprises. This can be said for the roadside boundary and the Waiongana Stream boundary.

Lease Arrangements

With regards to lease opportunities, the small scale of the subject site and lack of economic and commercial viability both now and over 30 years. Therefore, leasing to another party will not overcome the constraints on economic viability. There is also the economic burden of the lease price to overcome, as lease prices can be fixed to land value. As this property on a per hectare basis is valued at a price more than double what a good condition dairy farm is worth, leasing would not be viable at market rates.

²³ <https://www.worksafe.govt.nz/topic-and-industry/road-and-roadside/keeping-healthy-safe-working-road-or-roadside/part-c/23-0-working-near-the-rail-corridor/>

8.3 Assessment Against NPS-HPL 3.10 (3)

No Account for Economic Benefits other than Land-Based Primary Production

Assessments undertaken above including alternative forms of land based primary production, improved land management strategies, alternative production strategies, water efficiency or storage methods, reallocation or transfer of water and nutrient allocations, boundary adjustments including amalgamations and lease arrangements are independent of any potential economic benefit of using the HPL for purposes other than land-based primary production.

Impact of Loss of HPL on Landholding

The assessment has considered the impact that the loss of HPL would have on the landholding in which the HPL occurs. The subject site is approx. 7.1 ha, of which 1.45 ha is identified as LUC unit 3e2 and the remaining 5.65 ha as LUC unit 2c3. Cumulatively, this area does not account for 0.01% of the class 2 and 3 land within the New Plymouth Territory, as shown in Figure 9 below, according to Manaaki Whenua Landcare Research²⁴.

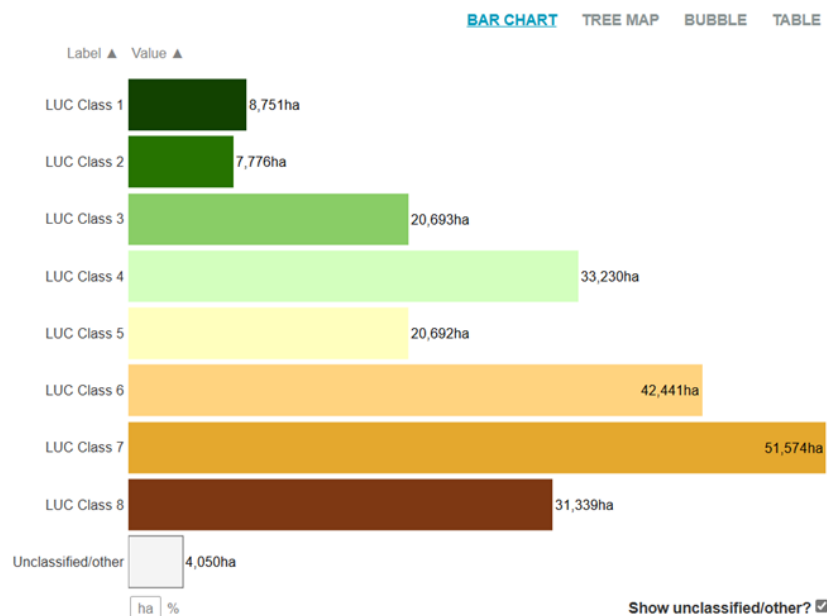


Figure 9: New Plymouth District Land Use Capability Data²⁵

The NZLRI can also encompass areas that may not be HPL due to the broad scale used, as discussed in section 4. The LiDAR information and site-specific soil mapping confirm this to be the case on the subject site with only 3.3 ha available for land-based primary production purposes, therefore, it is not seen as a significant loss of HPL soils.

²⁴ [Land Use Capability » Maps » Our Environment](#)

²⁵ [Land Use Capability » Maps » Our Environment](#)

Future Productive Potential

This assessment has considered the future productive potential of land-based primary production on the property, without being limited by its past or present uses. The permanent and long-term constraints, non-reversible land fragmentation, and small scale of operation result in there being no reasonable and practicable land management strategies for improving the productivity capacity of the property.

8.4 Assessment Against NPS-HPL 3.10 (1)(b)

HPL Lost from Proposed Subdivision

7.1 ha total.

Despite being mapped as LUC 2c3 and 3e2, site-specific LUC mapping and LiDAR imagery demonstrate areas of the land limited by steep terrain, historic erosion, and anthropic soil disturbances from infrastructure development. Only 3.3 ha of the 7.1 ha site is identified as flat to gently undulating and suitable for primary production therefore, it is not seen as a significant loss of HPL.

Will Significant Loss of Productive Capacity Occur?

No.

There is only 3.3 ha available for land-based primary production purposes which accounts for less than 0.01% of the districts class 2 and 3 land. The loss of HPL across the subject site is negligible and the potential for amalgamation is not feasible.

Will Fragmentation of Large Geographically Cohesive Areas of HPL Occur?

No.

The significant constraints and isolation of the HPL significantly reduces the productive capacity due to the existing rural lifestyle which is currently fragmented and isolated. Therefore, the removal of this HPL will not cause any fragmentation of geographically cohesive HPL as it is not part of a geographically cohesive area of HPL to begin with.

Will the Development result in Any Reverse Sensitivity Effects

No.

The proposed subdivision and its associated activity will have no impact on surrounding land use now or in the future. It is unlikely any activities will provide any disturbance from this development.

8.5 Assessment Against NPS-HPL 3.10 (1)(c)

Environmental

Improved/No change.

The removal of 7.1 ha total of HPL will have negligible material impact on the environment. If the property was to run at maximum capacity under intensive primary production, fertiliser (both capital and maintenance) would be required to improve the productivity of the soils which would likely increase pollutants (phosphorus, sediment, nitrogen, e. coli from animals etc.), resulting in a decrease in the current environmental state.

Social

Improved.

The proposed subdivision will provide additional housing and bring people to the area to live. This results in improved social outcomes and greater benefits for the community.

Although the existing poultry farm is not seen as a land-based activity, this is an existing primary agricultural activity, and the proposal seeks to protect this enterprise, as it creates jobs within the community and is seen to be of value within Tegel's other enterprises in the community, given its proximity to other poultry enterprises.

Cultural

No change

There are no known sites of cultural significance within the subject property.

Economic

Improved.

The site is economically unviable for conventional land-based production due to its limited scale, isolation, and surrounding land-use constraints.

The proposed subdivision will create economic uplift by enabling land use that reflects its locational advantages, supporting housing demand and sustaining existing employment within the poultry operation.

Given that the land's productive potential is marginal, the economic benefits of the proposal exceed any theoretical loss of land-based agricultural output, while the predominant source of income for the site resides in the existing intensive primary indoor poultry farming.

Will the benefits outweigh the costs?

Yes.

The environmental, social, cultural, and economic benefits of the proposed subdivision outweigh the long-term costs associated with the loss of a small area of HPL.

The proposal aligns with the intent of Clause 3.10(1)(c) by achieving a more efficient and sustainable use of land within the district while maintaining or improving the surrounding environmental and community outcomes.

9.0 Conclusion

Overall, while some of the land and soils within the subject site are categorised as high class under the NPS-HPL, the feasibility of any long-term future land-based primary production activity would be restricted due to:

Limitations to productive uses

- Adjacent residential properties and sensitive receptors
- Land contour, anthropic soils, and utilities
- Railway line, roads, wide stream, and existing development
- Existing land use of commercial poultry

Lack of expansion or alternative forms of land-based primary production options

- No opportunity for improved or alternative land management and production strategies
- No infrastructure (water irrigation, fences, sheds)
- Small, fragmented, productive areas limiting operational scale
- Geographic isolation and physical boundaries limit amalgamation opportunities

Given the constraints identified above, AgFirst believe that the proposed four-lot subdivision meets the NPS-HPL exemptions in clause 3.10. In particular:

- Based on our assessment of the site, there are permanent and long-term constraints on the land that mean the use of the highly productive land for land-based primary production is not economically viable for at least 30 years.
- Removing the site from productive use will cause no significant loss in the district's productive capacity of highly productive land, due to the severe limitations and long-term constraints outlined above and throughout this assessment.
- Due to the existing fragmentation and development of the site, the proposed four-lot subdivision will not cause any fragmentation of large and geographically cohesive, highly productive land.
- The assessment has considered all reasonably practicable options that would retain the productive capacity of the highly productive land.

Due to the limitations of the site, the property will not be economically viable for land-based primary production during the next 30 years. Furthermore, there does not appear to be any higher and better primary land use for the site through further development or amalgamation, given the existing and future land use constraints.

10.0 Appendices

10.1.1 Subject Site Amenities



<p>Author : BD</p>	<p>Popuanui Chickens</p> <p><small>Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors</small></p> <p>Coordinate System: NZGD 2000 New Zealand Transverse Mercator</p>	<p>Scale: 1:2,500</p> <p>0 0.04 0.09 Kilometers</p> <p>Date: 7/05/2025</p>	<p>Legend</p> <ul style="list-style-type: none"> Boundary Named_rivers PowerLine Gas_Transmission_Netw NZ_Rail_Network NPOC_Infrastructure_W
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10.1.2 Overview of Soil Limitations

The NZLRI shows the subject site contains approx. 5.65 ha mapped as LUC unit 2c3. As outlined in Table 1, this unit is defined by flat to gently sloping land, with slope classifications of A (<4 degrees). However, portions of the site fall outside this slope range. The site in general can be described as small terraces that are generally undulating, increasing in slope angle towards the Waiongana Stream.

Field assessment confirmed variability in soils and slopes, including areas of anthropic soils significantly modified by past construction activities, and poorly drained soils. These alterations, combined with natural slope and drainage constraints, limit the site's ability to achieve the indicative 13,750 kg DM/ha yield associated with LUC 2c3. Approximately 1.7 ha of land mapped as LUC 2c3 is undulating to steep, dominated by gorse and Kikuyu, and aligns more closely with LUC 6e1, with an estimated yield of 8,250 kg DM/ha. The remainder of the site aligns with LUC 3e2, which has an estimated pasture production potential of 11,550 kg DM/ha, and is considered representative of the site's overall productive capacity.

LUC unit 2e1²⁶ is mapped in the area and includes gently undulating slopes within its parameters. It is the only Class 2 unit in the region that aligns with the undulating land on the subject site. Map units 3, 7, and 8 contain land that is generally undulating with A and B slope classifications, supported by LiDAR slope data, as shown in Figure 5.

Map units 5 and 6 are steep, with slope classes ranging from D to F. These steeper areas make up approx. 1 ha of the property. Some historical erosion is evident in these locations, although it has since been stabilised. These units correspond with various class 6 LUC units in the region and present notable constraints for productive use, particularly due to slope and erosion potential.

Map units 1, 2, 3, and 4 comprise of approx. 4 ha of the property and fit within the parameters of LUC unit 3e2. These areas exhibit limitations due to slope and erosion potential. However, map unit 4 is better interpreted as a compound unit due to its location within the landform identified by map units 5 and 6.

Map unit 7, located adjacent to the southwestern poultry shed, contains anthropic soils that have been significantly altered by past construction activities. Anthropic soils are constructed by or drastically disturbed by people²⁷. They include soil materials formed by stripping of the natural soil, deposition of refuse or spoil, or by severe soil mixing. The original character of the soil and the normal soil properties are lost. These soils exhibit mixed horizons, with parent material and topsoil mixing. Identified by differences in colour, particle size, and structure. Rooting depth is variable, averaging up to 40 cm but shallower in areas with shallow topsoil depositions. This is classified as shallow in the

²⁶ Taranaki - Manawatu Region: Land Use Capability Extended Legend - Land Use Capability (LUC) archive – Manaaki

²⁷ https://soilsmaps.landcareresearch.co.nz/?layername=fsl_nzsc&idcolumn=nzsc_order&idvalue=A&mapfile=fsl&srs=EPSG:2193&mode=normal

NZLRI soil classification²⁸. Although mottling is present, indicating a drainage limitation, the more significant constraint appears to be structural, including compaction and soil development, evidenced by varying plant rooting depths.

Similar characteristics are present in the northern corner of the site, where a constructed drain has further disturbed the soil profile. In this area, soil development is weak, structure is inconsistent, and the presence of increased mottling percentage indicates a significant drainage limitation.

The northernmost area of the site includes a polygon where historic topsoil deposits from construction activities have altered the natural land surface. This area exhibits uneven topography, restricted surface runoff, inconsistent soil structure, and depth. These modifications limit the current land use potential for operations such as mowing or cultivation. Without subsurface investigation, it remains uncertain whether the original soil beneath these deposits remains intact or if the modifications are irreversible.

10.1.3 Agricultural Assessment

The subject site has approx. 3.3 ha of versatile land available for potential land-based primary production uses.

Class 1, 2, and 3 soils are appropriate for a number of primary production uses, which are outlined below.

Livestock

Dairy

The 2023/24 Dairy Stats²⁹ reported that for Taranaki, there was an average stocking rate of 2.76 cows/ha.

- For the subject site, this equates to 9 dairy cows.

It would not be economically viable for commercial dairy activity to occur on the subject site. The area required for infrastructure (farm dairy, tanker track, stock lane ways, effluent system, shedding) take up a large amount of the available area. A total of 3.3 ha is not of a scale to be economically viable for dairy activity, particularly due to the establishment cost of the infrastructure.

Dairy Support

Dairy heifer grazing could occur on the property without the need for additional infrastructure, making it a practical land-use scenario for assessing productive potential. The pastoral productivity of the site is estimated at 11,550 kg DM/ha. A typical 500 kg Friesian heifer requires approximately 2,727 kg DM per annum³⁰. When applying a pasture utilisation factor of 80%, the site could theoretically support around 11 heifers.

²⁸ Hewitt, A. E. 1993: Methods and rationale of the New Zealand Soil Classification. *Landcare Research Science Series 2*. Lincoln, New Zealand. Manaaki Whenua Press. 71p.

²⁹ [dairy-statistics-2023-24.pdf](#)

³⁰ <https://www.dairynz.co.nz/resources/resource-list/facts-and-figures/>

The average Taranaki grazing rate of \$12 per head per week, the estimated gross return from this land use would be approximately \$6,947 per annum, or \$2,105 per hectare. After accounting for operating expenses including fertiliser, power, wages, rates, repairs and maintenance, and administration, the analysis results in a net loss of \$582.94 (– \$176.65 / ha).

Beef

The 2024 Agricultural Production Statistics³¹ reported that Taranaki carries 134,000 beef animals, the region has approx. 69,663 ha of land used for beef production³² which equates to an average stocking rate of 1.92 beef animals/ha.

- For the subject site, this equates to 6 beef animals.

It would not be economically viable for commercial beef activity to occur on the existing land holding.

Sheep

The 2024 Agricultural Production Statistics³³ reported that Taranaki carries 435,000 sheep on an area of approx. 50,262 ha¹⁵, which equates to a stocking rate of 8.65 sheep/ha.

- For the subject site, this equates to 28 sheep.

It would not be economically viable for commercial sheep activity to occur on the existing land holding.

Conclusion

The subject site is not of a scale large enough for commercial livestock production to be economically viable. The average dairy platform for the Taranaki region is 106 ha³⁴, whilst the average-sized sheep and beef farm ranges from 197 – 914 ha, depending on the class of land³⁵.

Horticulture

The land and climate can be suited to a range of horticultural uses, however, minimum requirements for suitable horticulture crops are outlined below based on information from Tupu (Te Puni Kokiri/Ministry for Māori Development) and Venture Taranaki fact sheets and blueprints³⁶.

Covered Crops

Covered crops and Greenhouses have not been included in the assessment, as they are not associated with land-based primary production, as they are not reliant on the soil resource of the land.

³¹ [agricultural-production-statistics-year-to-june-2024-final.xlsx](#)

³² [TRC_State-Of-Environment_A4_Web-Spreads.pdf](#)

³³ [agricultural-production-statistics-year-to-june-2024-final.xlsx](#)

³⁴ [nz-dairy-statistics-2021-22-web.pdf](#)

³⁵ [Sheep & beef farm survey | Beef + Lamb New Zealand](#)

³⁶ [Branching Out » Taranaki, New Zealand](#)

Uncovered Crops

Including but not limited to maize and carrots. A minimum area of 5 ha is required for commercial viability³⁷. Although it is possible to grow crops on land areas less than this.

With the existing land holding being only 3.3 ha, with activities restricted around amenities, the land area for uncovered crops is insufficient and therefore not suitable for commercial-scale production.

Kiwifruit and Avocados

For Kiwifruit, a minimum land area of 4 ha of owner-operated land is required for economic viability³⁸. However, commercially managed orchards need to be larger.

For small owner-operated Avocado orchards, 2 – 5 ha is required, however, the subject site has amenities that restrict the land area that can be utilised, discussed in section 9. Therefore, the existing land holding is not suitable for commercial production.

Hops and Hemp

Hops require a minimum area of 40 ha for commercial viability³⁹. The existing land holding would not be economically viable for Hop production.

A minimum area of 10 ha of Hemp is required for commercial viability⁴⁰. The existing land holding is also within 5 km of Puketapu school and may not be eligible for licensing. The existing land area is not suitable for commercial hemp production.

Conclusion

The subject site is not of a scale large enough for commercial horticulture production to be economically viable. This is further accentuated due to the significant capital investment required. For investment in high-value horticulture, there is also the requirement of water for irrigation, particularly with climate uncertainties. This adds further to the constraints and viability. Water availability is limited from surface water sources, particularly in drought conditions when it is most needed for high-value crops. This often leads to groundwater sources being preferable. The investigation costs to determine and assess sustainable yields for water takes are a significant cost (upwards of \$100,000). Therefore, for an operation of this scale, it is not economically viable with no return on investment.

³⁷ [Commercial carrot growing NZ: statistics and guidance](#)

³⁸ [Kiwifruit-Blueprint-Final-v2.pdf](#)

³⁹ [Branching-Out-Hops-scale-up-opportunities-Industry-paper-March-2024-FINAL.pdf](#)

⁴⁰ [Hemp-Blueprint-Final-v2.pdf](#)

10.1.4 Gross Margin Dairy Heifer Grazing

Table 5: Gross Margin Analysis of Dairy Heifer Grazing

	Unit / Basis	Rate	Quantity	Weeks	Total
Feed Production					
Pasture Growth	kg DM/ha	11,500	3.3		37,950 kg DM
Pasture Utilisation	%	80			
Total DM Available					30,360 kg DM
DM Required per Heifer	kg DM	2,727			
Stocking Rate	head/ha				11
Income	per head per week	\$12.00	11	52	\$6,947.06
Expenses					
Fertiliser	300 kg/ha SSP	\$539.35	1		\$539.35
Power	per ha	\$14.14	3.3		\$46.66
Wages	per hour	\$23.50	75		\$1,762.50
Rates	Annual based on actual				\$4,967.18
Repairs & Maintenance	per ha	\$126.67	3.3		\$418.01
Administration	per ha	\$49.80	3.3		\$164.34
Total Expenses					\$7,898.04
Net Return					-\$950.98
Net/ha					-\$288.18

10.2 Beef & Lamb Economic Service

Beef + Lamb New Zealand Economic Service

4/09/2023 10:07 am

Beef + Lamb New Zealand Economic Service				30-09-22	Forecast	
Sheep and Beef Farm Survey - \$ Per Hectare Analysis				Notes tab		
Class 5 N.J. Finishing - New Zealand						
	2019-20	2020-21	Provisional 2021-22	B+LNZ 2022-23	With interest & rates 2022-23	Without interest & rates 2022-23
Revenue Per Hectare						
1 Wool	25.67	19.41	27.50	28.21	28.21	28.21
2 Sheep	558.12	475.04	623.57	584.29	584.29	584.29
3 Cattle	770.92	659.49	925.36	903.57	903.57	903.57
4 Dairy Grazing	60.55	93.77	79.29	90.00	90.00	90.00
5 Deer + Velvet	-0.21	-0.04				
6 Goat + Fibre	0.34	0.31	0.10	0.10	0.10	0.10
7 Cash Crop	173.69	151.45	168.57	184.29	184.29	184.29
8 Other	87.78	99.30	100.26	107.76	107.76	107.76
9 Total Gross Revenue	1676.86	1498.73	1924.64	1898.21	1898.21	1898.21
Expenditure Per Hectare						
10 Wages	84.53	89.01	91.12	95.38	95.38	95.38
11 Animal Health	51.03	52.96	54.56	58.06	58.06	58.06
12 Weed & Pest Control	17.61	19.15	20.95	24.39	24.39	24.39
13 Shearing Expenses	35.80	37.84	38.06	39.40	39.40	39.40
14 Fertiliser	151.72	141.89	176.48	189.27	189.27	189.27
15 Lime	9.39	10.69	11.98	18.12	18.12	18.12
16 Seeds	31.84	37.81	39.10	38.77	38.77	38.77
17 Vehicle Expenses	43.11	48.13	51.04	53.33	53.33	53.33
18 Fuel	32.33	31.12	35.69	37.03	37.03	37.03
19 Electricity	12.72	13.17	13.50	14.14	14.14	14.14
20 Feed & Grazing	85.46	76.20	81.81	79.10	79.10	79.10
21 Irrigation Charges	2.02	1.16	1.16	1.16	1.16	1.16
22 Cultivation & Sowing	27.28	27.08	28.48	28.29	28.29	28.29
23 Cash Crop Expenses	19.52	20.31	21.81	17.84	17.84	17.84
24 Repairs & Maintenance	93.53	111.40	125.59	126.67	126.67	126.67
25 Cartage	25.58	30.47	31.55	32.62	32.62	32.62
26 Administration Expenses	42.28	47.40	48.78	49.80	49.80	49.80
27 Total Working Expenses	773.11	805.62	871.65	903.36	903.36	903.36
28 Insurance	24.13	24.08	24.73	25.51	25.51	25.51
29 ACC Levies	4.93	10.65	11.01	11.41	11.41	11.41
30 Rates	49.69	51.14	54.36	55.54	859.3	
31 Managerial Salaries	3.43					
32 Interest	120.51	114.27	102.85	106.61	3969.2	
33 Rent	40.12	39.76	41.54	42.31	0.00	
34 Total Standing Charges	242.82	239.90	234.49	241.38	4865.42	36.92
35 Total Cash Expenditure	1015.93	1045.51	1106.15	1144.74	5768.78	940.28
36 Depreciation	79.32	82.54	89.21	89.69	89.69	89.69
37 Total Farm Expenditure	1095.25	1128.06	1195.36	1234.29	5858.47	1029.97
38 Farm Profit before Tax	581.61	370.67	729.29	663.93	-3960.26	868.24

For more information: © Beef + Lamb New Zealand Economic Service 2022

10.3 Current Discharge Consent

Consent 4131-2



CHIEF EXECUTIVE
PRIVATE BAG 713
47 CLOTEN ROAD
STRATFORD
NEW ZEALAND
PHONE: 06-765 7127
FAX: 06-765 5097
www.trc.govt.nz

Please quote our file number
on all correspondence

Discharge Permit
Pursuant to the Resource Management Act 1991
a resource consent is hereby granted by the
Taranaki Regional Council

Name of
Consent Holder: Popuanui Chicken's Limited
W & S Curry
24 Te Arei Road West
R D 3
NEW PLYMOUTH 4373

Consent Granted
Date: 30 April 2008

Conditions of Consent

Consent Granted: To discharge poultry effluent from the cleaning of broiler chicken sheds by spreading onto and into land in the vicinity of the Waiongana Stream at or about (NZTM) 1704691E-5678841N

Expiry Date: 1 June 2026

Review Date(s): June 2014, June 2020

Site Location: Te Arei Road West, Lepperton

Legal Description: Lot 4 DP 5842 Blk III Paritutu SD

Catchment: Waiongana

*For General, Standard and Special conditions
pertaining to this consent please see reverse side of this document*
www.trc.govt.nz

Working with people • Caring for our environment

Doc# 505643-v1

OUR WHAT

Leading a
smarter,
sustainable,
high performing
primary sector

OUR HOW

Using the best
people and greatest
ideas for the benefit
of our clients

OUR WHY

We believe in
creating a vibrant
future for the
primary sector



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