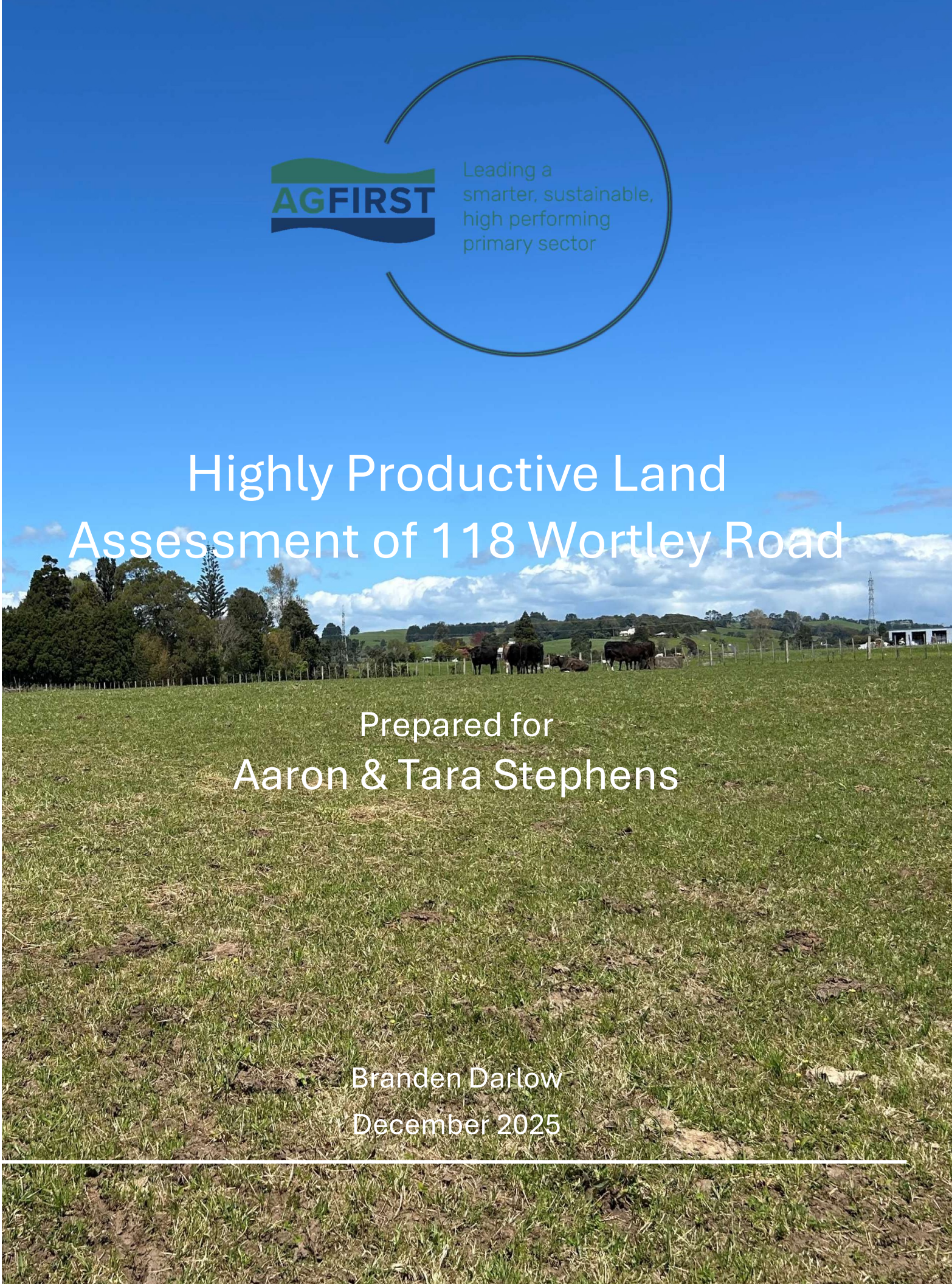

Highly Productive Land Assessment of 118 Wortley Road

Prepared for

Aaron & Tara Stephens

Branden Darlow

December 2025

Document Quality Assurance

Prepared by:	Branden Darlow MNZIPIM Agribusiness Consultant	
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Status:	Final	
Date:	9 December 2025	

Contents

Executive Summary

Aaron & Tara Stephens (**The Applicants**) own the property at 118 Wortley Road, Lepperton (**Subject Site**) and propose to subdivide the current Lot 1 DP 452310 into two titles. Comprising of proposed Lot 1 of 0.12 ha (1,245 m^2) and proposed Lot 2 of 3.23 ha. Proposed Lot 1 is largely occupied by an existing dwelling and curtilage.

The soils mapped at the site are classified under the New Zealand Land Resource Inventory (**NZLRI**) as LUC 2c 3 occupies 24.2% of the site, and LUC 3c 4 occupies 85.3% of the site. LUC 1–3 qualifies as Highly Productive Land (**HPL**) under the National Policy Statement for Highly Productive Land (**NPS-HPL**). The proposed subdivision removes a negligible area of HPL from the balance lot, maintaining the overall productive capacity of the Subject Site in line with the NPS-HPL.

Section 3.8 of the NPS-HPL provides exemptions for boundary amalgamations and subdivision on HPL land. A summary of this assessment showed:

- There will be no change to productive capacity
  - The proposed subdivision is largely occupied by an existing dwelling, and the small area that is not currently occupied will have no change to the overall productive capacity of the site.
  - Versatility will remain unchanged as the area proposed for subdivision is already occupied by a dwelling and associated curtilage.
  - There will be no changes to the soil drainage network.
  - There will be no change to the land use options on the remainder of the land within the subject site.
- There is no cumulative loss of HPL to the district of the proposed subdivision.
- No additional reverse sensitivity effects are identified that could impact the operation of the surrounding land or the land within the subject site, as no additional housing will be created as a result of this proposal.

The proposed subdivision will retain the overall productive capacity of the subject property therefore, it meets **Clause 3.8(1)a** of the NPS-HPL. AgFirst views the proposed subdivision as having a negligible impact on the property's productive potential.

1.0 Background

Aaron & Tara Stephens **(The Applicants)** own the property at 118 Wortley Road, Lepperton **(The Subject Site).** The Subject Site consists of a single title of Approximately 3.31 hectares **(ha**) and has two existing dwellings and curtilage. They are proposing to subdivide this into two titles. The Subject Site is zoned in the Rural Production Zone within the New Plymouth District Plan[1]. The location of the subject site is presented in **Figure 1**.

AgFirst Taranaki has been engaged by the Applicants to provide an assessment of the proposed subdivision and land use against the National Policy Statement – Highly Productive Land (**NPS-HPL**).

The purpose of this report is to assess the impact of this subdivision and land use in relation to the NPS-HPL, with respect to the presence of highly productive land (HPL) and the impact of the subdivision on land-based primary production. AgFirst visited the Subject Site on the 3rd of November 2025 to gain an understanding of the productive capacity and the impact that the proposed subdivision would have on land-based primary production.

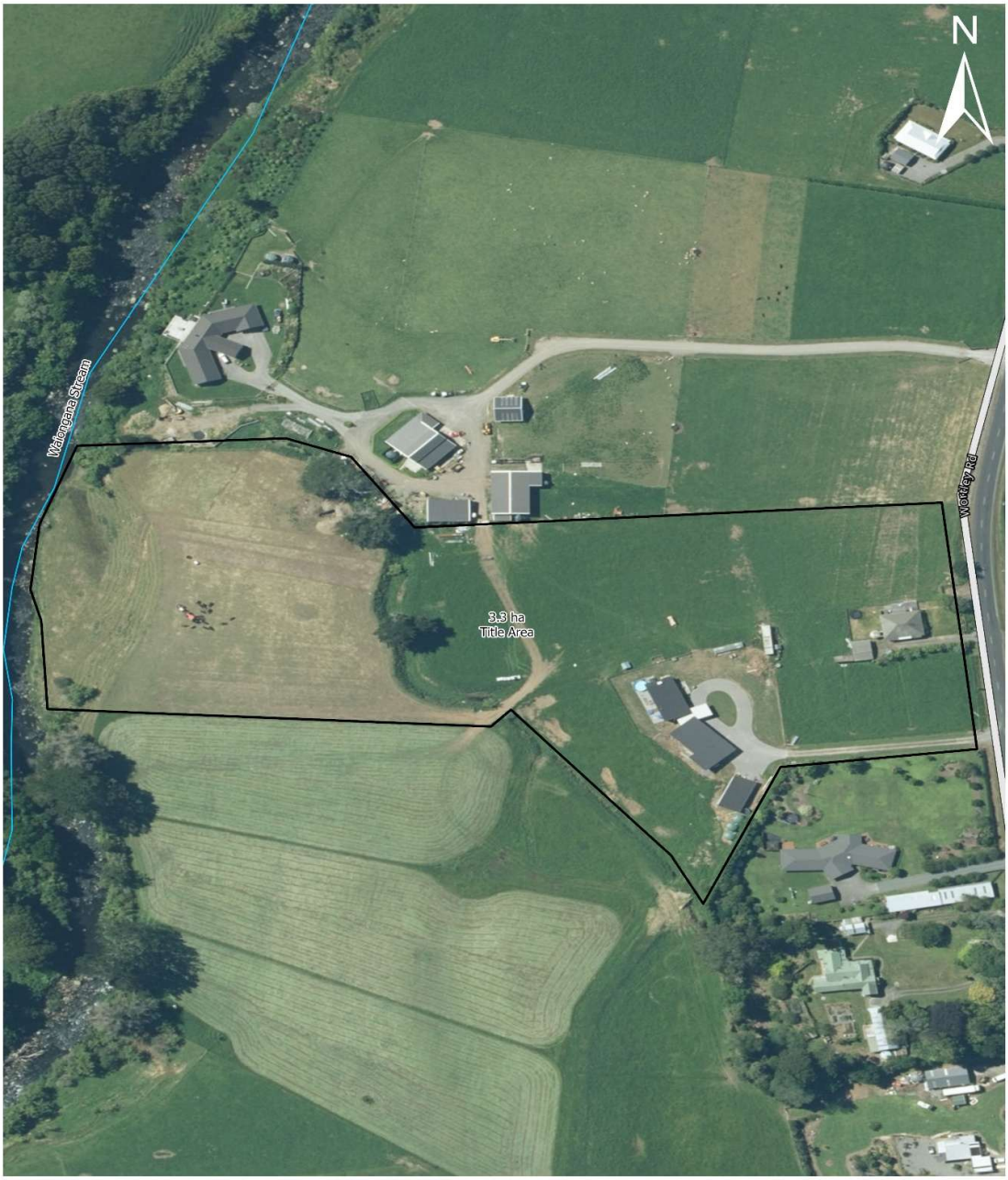
1.1 Site description

The Subject Site (Lot 1 DP 452310) comprises approximately 3.31 ha of irregularly shaped land bordered by the Waiongana Stream along the western boundary and Wortley Road to the east. The site is currently divided into three paddocks and does not contain any formed access tracks. An unnamed tributary dissects the property near the centre, with two culverted crossings that provide internal access.

The topography consists of a gently undulating elevated terrace that transitions into steep slopes towards the Waiongana Stream, with a small footslope at the base of the watercourse. The property contains two existing dwellings and associated curtilage areas. Stock water is supplied via a reticulated system servicing the paddocks.

The Subject Site currently consists of approximately 2.5 ha of productive land suitable for land-based primary production. The non-productive (or ineffective) area, as shown in **Figure 2** below, is approximately 0.8 ha, which includes two residential dwellings and curtilage, sheds, driveways, mixed vegetation, a watercourse and steep land. A detailed breakdown is provided in Section 6.1.1 in the Appendices.

[1] Part Operative District Plan - New Plymouth Part Operative District Plan



AGFIRST	**Aaron & Tara Stephens**	Scale: 1:1,500	**Legend**
	Eagle Technology, LINZ, StatsNZ, NIWA, Natural Earth, © OpenStreetMap contributors., Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors	0 18.8 37.5 Meters	Property Boundary — Named_rivers
Author : BD	Coordinate System : NZGD 2000 New Zealand Transverse Mercator	Date: 5/11/2025	

Figure 1: Property Boundary

AGFIRST	**Aaron & Tara Stephens**	Scale: 1:1,500	**Legend** Property Boundary Productive Area Non-Productive
	Eagle Technology, LINZ, StatsNZ, NIWA, Natural Earth, © OpenStreetMap contributors., Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors	0 18.8 37.5 Meters	
Author : BD	Coordinate System : NZGD 2000 New Zealand Transverse Mercator	Date: 5/11/2025	

Figure 2: Productive Area within Subject Site

1.2 Existing Land Use

The property is predominantly in permanent pasture and managed under a low-intensity grazing system. Approximately eight beef cattle are grazed across the site and adjoining land, with occasional hay and silage harvested during periods of pasture surplus. Areas of mature vegetation and natural waterways are present. Two dwellings with associated curtilage occupy a small portion of the property, and the remainder is used for pastoral and light recreational purposes, including riding motorcycles, off-road vehicles and mountain bikes. Overall, the land is currently best described as an extensively grazed, low-input pastoral holding.

The Subject Site is situated approximately 90 m above sea level on the flanks of the Taranaki volcanic ring plain. The property is exposed to prevailing westerly winds, typical of the region, and lacks established shelterbelts to mitigate this climatic exposure.

1.3 Regulatory Framework for Highly Productive Land

The property falls under the jurisdiction of the New Plymouth District Council and the Taranaki Regional Council. The NPS-HPL came into effect on the 17th of October 2022. The statement sets out a prescriptive approach for councils to identify and protect highly productive land. Until councils have given effect to the NPS-HPL, the interim is provided:

3.5 (7) Until a regional policy statement containing maps of highly productive land in the region is operative, each relevant territorial authority and consent authority must apply this National Policy Statement as if references to highly productive land were references to land that, at the commencement date:

> *(a) is (i) zoned general rural or rural production; and*
> *(ii) LUC 1, 2, or 3 land;*

LUC 1, 2, or 3 land is defined as: land identified as Land Use Capability Class 1, 2, or 3, as mapped by the New Zealand Land Resource Inventory (NZLRI) or by any more detailed mapping that uses the Land Use Capability classification.

2.0 NZLRI Assessment of Soils LUC

The method outlined by the NPS-HPL to identify HPL is to use the LUC classification based on the New Zealand Land Resource Inventory **(NZLRI).** The LUC Classification system is used in New Zealand to help achieve sustainable land development and management on farms. The LUC classification categorises land areas or polygons into classes, subclasses, and units according to the land's capability to sustain productive use. This is summarised in **Figure 3** below.

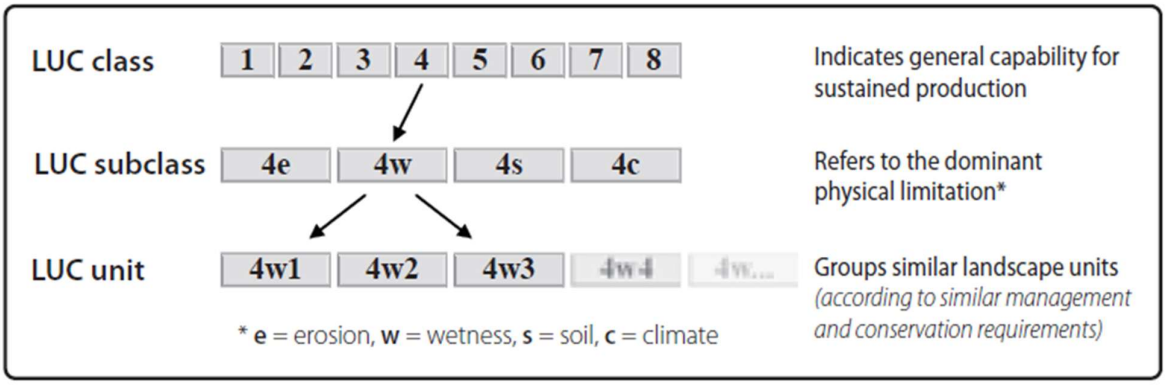


Figure 3: Components of the land use capability classification[2]

2.1 Land Use Capability and Soil

The property is underlain by volcanic ash with yellow-brown loam derived soils of the New Plymouth Sandy Loam (LUC 2c3) and Stratford Sandy Loam (LUC 3c4) series[3], shown in **Figure 4**. Formed on andesitic tephra from the Taranaki volcanic ring plain, these soils are moderately to highly fertile, well-structured, and free draining. Overall, the land-use versatility is limited more by climatic factors than by soil factors[4].

The New Plymouth Sandy Loam (LUC 2c3) is mapped over approximately 0.8 ha, although **Figure 5** shows that most of this area is steeper than the parameters typical of the unit identified in **Table 1**. As a result, its extent is likely overstated in the NZLRI due to the broad mapping scale. Recent LiDAR[5] (Light Detection and Ranging) analysis, using slope and elevation data captured at 4–8 pulses per m^2 and mapped at a 1:1,000 scale, provides high-resolution accuracy for identifying topographic variation influencing the land's productivity and versatility. The LiDAR for the subject site is shown in **Figure 5**. The Stratford Sandy Loam (3c4), covering approximately 2.9 ha on flat to undulating slopes, is more representative of the remainder of the site's productive potential. These moderately well-drained, fine-textured soils have good structure and moderate fertility. Rainfall of 2,000 – 2,500[6] mm per annum supports pasture growth but limits cropping versatility due to excess moisture and shorter cultivation windows in winter.

[2] LUC_Handbook_ed3_v9-5_standardquality.pdf
[3] Land cover and soil
[4] Taranaki - Manawatu Region: Land Use Capability Extended Legend - Land Use Capability (LUC) archive - Manaaki Whenua Landcare Research Digital Library
[5] Taranaki LiDAR 1m DSM (2021) | LINZ Data Service
[6] Taranaki Climate WEB.pdf

AGFIRST	**Aaron & Tara Stephens**	Scale: 1:1,500	**Legend**
	Eagle Technology, LINZ, StatsNZ, NIWA, Natural Earth, © OpenStreetMap contributors., Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors	0 18.8 37.5 Meters	Property Boundary, 3c 4, 2c 3
Author : BD	Coordinate System : NZGD 2000 New Zealand Transverse Mercator	Date: 5/11/2025	

Figure 4: NZLRI LUC on the subject site

Figure 5: LiDAR slope data on the subject site

2.2 Land Use Capability Description

Table 1: NZLRI Land Use Capability unit descriptions for the subject site[7]

Unit	Unit Description	Present & Potential Land Use	Slope	Rock Type	Soil Name	Area % of Site
2c 3 0.8 ha	Flat to undulating slopes with yellow-brown loam soils developed on deep andesitic tephra occurring in Taranaki where rainfall is between 1600 and 2000 mm p.a.	Intensive grazing incl. dairying. Cereal cropping Horticulture. Cereals. Root and green fodder crops.	A, A+B	Andesitic Tephra	New Plymouth sandy loam	24.2%
3c 4 2.9 ha	Flat to undulating slopes on the Taranaki ring plain with yellow-brown loam soils developed on andesitic tephra. High rainfall of approximately 2000-2500mm p.a. limits cropping versatility.	Intensive grazing incl. dairying. Horticulture. Root and green fodder crops.	A, A+B	Andesitic Tephra	Stratford sandy loam	85.29%

3.0 Productive Capacity Assessment

The productive capacity assessment identifies and quantifies the proportion of land within the subject site that can reasonably support land-based primary production. As illustrated in **Figure 2** and **Section 6.1.1** in the **Appendices**, there is approximately 2.5 ha available for land-based primary production.

NZLRI mapping shown in **Figure 4** and described in **Table 1**, LiDAR mapping shown in **Figure 5**, and field observations confirm that the dominant LUC units and soil types are suited primarily to **intensive grazing**. With high annual rainfall limiting cropping versatility, as denoted by the LUC unit and as discussed above. Within these soil and climatic parameters, dairy heifer grazing is the highest and best use of the land, given that the site is of an insufficient scale to support a working dairy farm with no associated infrastructure, and there is restricted access for neighbouring dairy farms to adjoin this land.

LUC unit 3c 4 has a total physical carrying capacity is 25 stock units (SU)/ha[8] in **optimal** conditions[9], with a feed demand of 550 kg DM[10] per SU. This represents approximately 13,750 kg DM/ha of pasture per year and is representative of the subject site's overall productive potential on the productive area.

[7] Taranaki - Manawatu Region: Land Use Capability Extended Legend - Land Use Capability (LUC) archive - Manaaki Whenua Landcare Research Digital Library
[8] Taranaki - Manawatu Region: Land Use Capability Extended Legend - Land Use Capability (LUC) archive - Manaaki Whenua Landcare Research Digital Library
[9] LUC_Handbook_ed3_v9-5_standardquality.pdf
[10] Sheep and beef cattle production systems

3.1 Proposed Land Use

The proposed subdivision, illustrated in **Figure 6**, includes the existing dwelling and its associated curtilage within a 1,245 m^2 area (proposed Lot 1). The dwelling and curtilage currently occupy approximately 890 m^2, as detailed in **Section 6.1.1** of the **Appendices**. Proposed Lot 1 extends into the productive area of proposed Lot 2 by approximately 355 m^2 (0.03 ha). This encroachment is minor and will not reduce the overall productive capacity of the land, as demonstrated in **Tables 2 and 3** below.

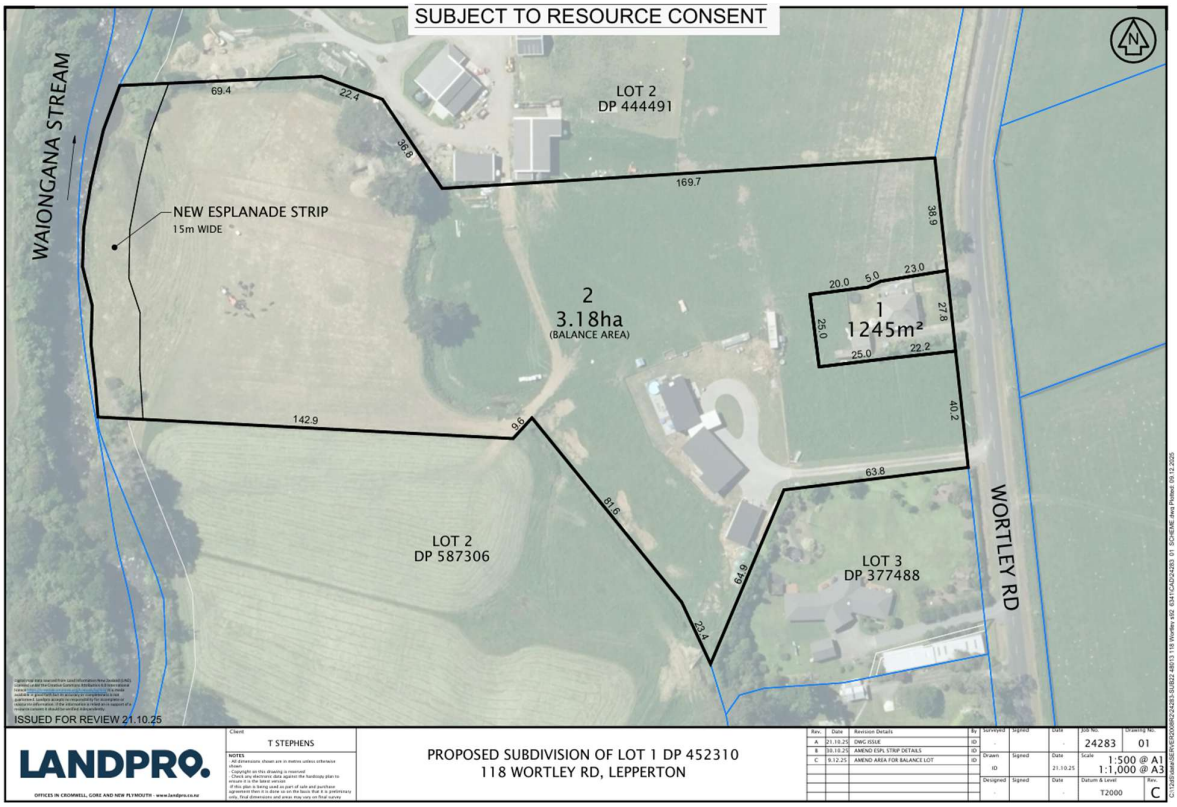


Figure 6: Proposed Subdivision

Table 2: Current and Proposed Areas

Current Title Area*		Proposed Area	Title Area	Non-Productive Area
Lot 1 DP 452310	3.31 ha	Proposed Lot 1	0.12 ha	0.12 ha
		Proposed Lot 2	3.23 ha	0.73 ha
Productive Area	**2.5 ha**		**Proposed Productive Area**	**2.46 ha**

*The surveyed area is taken from previous survey data and matches the area shown on the Record of Title, shown in **Figure 6**. The calculated area, noted as 'Title Area' in **Table 2**, is derived from the LINZ database. The exact final area will be determined by a new survey at the time of subdivision. Areas shown on the scheme plan are indicative only and may change once the detailed site survey is completed.

Table 3: Revised Stocking Unit Comparison

Farm Name	118 Wortley Road		Total RSU on Farm	Total RSU/ha on Farm
Farm Size (Total ha)	3.31			
Effective Area (ha)	2.50		56	22
Block Name	Block Area (ha)		Total RSU on Block	Total RSU/ha on Block
Lot 1 DP 452310	2.5		56	22
Proposed Lot 2	2.46		56	23

Stock class	SU/ha	Animal performance definition	Number of Stock Class Across Farm	Lot 1 DP 452310	Proposed Lot 2
				2.5 ha	2.46 ha
Dairy bull	6.1	620kg Friesian breeding bull			
Dairy cow	10.4	450kg F8J8 dairy cow producing 400kg			
Dairy heifer 1-2 years age	5.1	F8J8 199 -419kg May to Jun	11	11	11
Dairy heifer calf (weaned)	1.6	F8J8 110 -199kg Dec to Jun			
Beef bull	6	620kg Beef cross MA breeding bull			
Beef cow	7.5	480kg MA Beef cross breeding cow			
Bull 1-2 years age	6.8	Friesian bull 209kg to 535kg slaughter			
Steer 1-2 years age	5.8	WF steer 203kg to 478kg slaughter			
Heifer 1-2 years age	5.7	WF heifer 208kg to 420kg slaughter			
Steer calf< 1 year (weaned)	2.7	WF steer 100kg to 203kg Dec to Jun			
Bull calf< 1 year (weaned)	2.7	Friesian 100kg to 209kg bull Dec to Jun			
Heifer calf< 1 year (weaned)	1.6	WF heifer 90kg to 208kg Dec to Jun			
Total Animals on Farm / Block			11	11	11

3.2 Productive Capacity Assessment Summary

Table 3 above shows the productivity of the current and proposed title areas using Revised Stocking Unit **(RSU)** calculations. The RSU methodology provides a comparable measure of productive capacity across titles on a per-hectare basis.

The site's productive potential, as indicated by the LUC units and surrounding land use, is primarily suited to dairy farming and dairy support, with some dry stock grazing present. Based on its locality and existing infrastructure, dairy support represents the most suitable land use. The productive capacity of the identified LUC units, outlined in **Section 3**, was used to estimate annual dry matter production and corresponding carrying capacity for dairy heifers. These calculations indicate that the site can sustainably carry approximately 11 heifers from May to June. The proposed subdivision would result in only a 0.03 ha reduction in productive area, which is considered negligible and will not affect the overall carrying capacity of the site.

3.3 Productive Capacity in the District

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 approximately 3.31 ha, of which LUC 2c 3 occupies approximately 0.8 ha and LUC 3c 4 occupies approximately 2.9 ha or 85.3% of the subject site.

Considering class 3 being the predominant productive unit within the site and the unit that is affected by the proposed subdivision, the HPL area lost from the subdivision accounts for 0.0001% of the class 3 land within the New Plymouth Territory, as shown in **Figure 7** below, according to Manaaki Whenua Landcare Research[11].

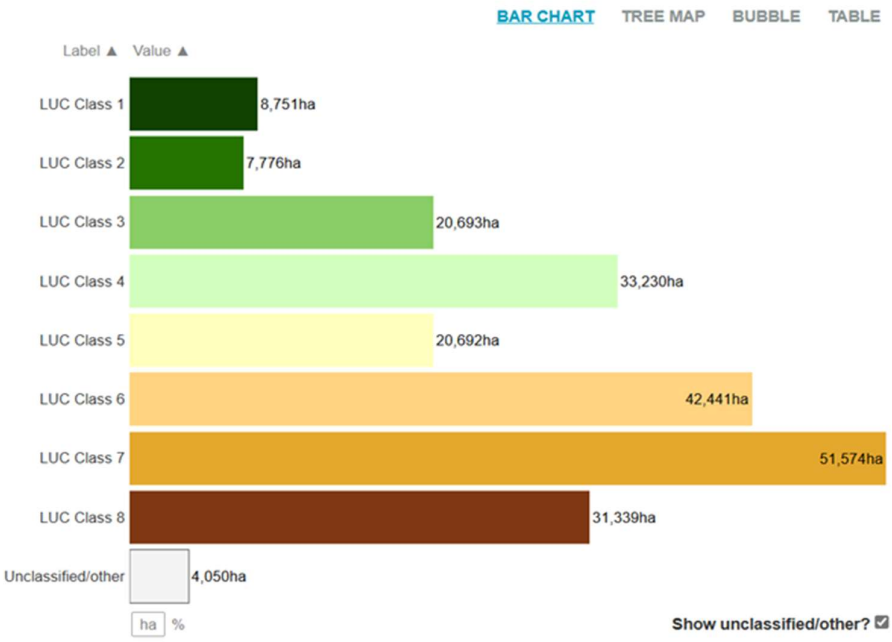


Figure 7: New Plymouth District Land Use Capability Data[12]

The Subject Site, with only 0.03 ha being affected in the context of land-based primary production purposes it is not a significant loss of HPL soils, nor a loss to productive capacity or production within the district.

[11] Land Use Capability » Maps » Our Environment
[12] Land Use Capability » Maps » Our Environment

4.0 NPS-HPL

The objective of the NPS-HPL is "*Highly productive land is protected for use in land-based primary production, both now and for future generations*" The NPS, however, does recognise that there are certain situations where the development of HPL is appropriate. The NPS-HPL allows for the subdivision of HPL if certain criteria are met. This section provides an assessment against clause 3.8.

(1) Territorial authorities must avoid the subdivision of highly productive land unless one of the following applies to the subdivision, and the measures in subclause (2) are applied:

- ***(a) The applicant demonstrates that the proposed lots will retain the overall productive capacity of the subject land over the long term:***
- *(b) The subdivision is on specified Māori land:*
- *(c) The subdivision is for specified infrastructure, or for defence facilities operated by the New Zealand Defence Force to meet its obligations under the Defence Act 1990, and there is a functional or operational need for the subdivision.*

(2) Territorial authorities must take measures to ensure that any subdivision of highly productive land:

- ***(a) avoids, if possible, or otherwise mitigates any potential cumulative loss of the availability and productive capacity of highly productive land in their district; and***
- ***(b) avoids, if possible, or otherwise mitigates, any actual or potential reverse sensitivity effects on surrounding land-based primary production activities.***

Productive capacity is defined as, 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*

4.1 Productive Capacity

Territorial authorities must avoid the subdivision of highly productive land unless one of the following applies to the subdivision, and the measures in subclause (2) are applied:

(a) The applicant demonstrates that the proposed lots will retain the overall productive capacity of the subject land over the long term:

Table 4: Assessment against overall productive capacity

PRODUCTIVE CAPACITY	
Physical characteristics	
Soil Type and Soil Properties	**No change** The soil properties and type will remain unchanged, considering the proposed subdivision.
Versatility	**No change** The proposed subdivision incorporates the existing dwellings and curtilage, resulting in no material change to the versatility or productive potential of the Subject Site.
Soil Drainage	**No Change** The existing drainage network will not be modified by the proposed subdivision.
Potential rooting depth	**No Change** As the proposed subdivision involves no physical soil disturbance, there will be no change to the soil profile or potential rooting depth.
Erosion proneness	**No Change** The LUC units within the site are classified as having no erosion risk, and the proposed subdivision will not alter this rating or result in any erosion.
Flooding proneness	**No Change** The existing drainage network will not be modified.
Legal Constraints	
Legal constraints	**No Change** The proposed subdivision, which includes the existing dwelling and curtilage, will not impose any legal constraints on the productive use of the land. However, the Applicants and Tegel have agreed to register a covenant restricting certain activities on the subdivision if consent is granted. These restrictions will not affect the operation of a pastoral farming system and therefore will not impose any

	practical limitations on land-based primary production. The covenant primarily addresses agricultural-scale activities that could affect Tegel's operations. Under the government's Freshwater Farm Plan framework[13], pastoral landholdings exceeding 20 hectares are generally regarded as commercial-scale farms. At less than this threshold, the subject site is not of a scale that would enable commercial pastoral farming, and the covenant will not constrain productive use of the land.
Size and Shape of Land Parcels	
Size & Shape	**Negligible Change** The proposed subdivision will alter the title boundaries and result in a minor adjustment to the parcel shape and area. However, as outlined in this report, the change to the effective productive area is negligible and will not impact the overall productive capacity of the Subject Site over the long term.

4.2 Avoidance of Cumulative Loss, and Reverse Sensitivity

(2) Territorial authorities must take measures to ensure that any subdivision of highly productive land:

a. avoids, if possible, or otherwise mitigates, any potential cumulative loss of the availability and productive capacity of highly productive land in their district; and

b. avoids if possible, or otherwise mitigates, any actual or potential reverse sensitivity effects on surrounding land-based primary production activities.

Table 5: Assessment against the avoidance of cumulative loss, and reverse sensitivity

HPL lost from the proposed subdivision
0.03 ha The proposed subdivision will result in a minor reduction of Class 3 land, but this change is negligible and will not affect the site's overall productive capacity over the long term. Roadside access is already established for both existing dwellings, ensuring that the proposal will not cause any physical loss or degradation of soils from their current state.

[13] https://environment.govt.nz/assets/publications/Freshwater/Freshwater-farm-plan-system-overview.pdf

Will a significant loss of productive capacity occur?
No. While there is a very small loss of HPL, the productive capacity of the balance effective area will not change or reduce as a result of the subdivision.
Will fragmentation of large and geographically cohesive areas of HPL occur?
No The proposed subdivision will not fragment a large and cohesive area. This has already occurred through historical subdivision (as shown in **Section 6.1.2** in the **Appendices**). The subdivision does not fragment the site any further than the existing dwelling does, and this does not limit the productive potential of the Subject Site beyond its current size and potential.
Will the proposed boundary relocation result in any adverse reverse sensitivity effects?
No. There are several lifestyle blocks surrounding the Subject Site, and there are no known issues affecting the management of the Subject Site and its existing dwellings. No new sensitive activities are proposed, which might give rise to effects on relevant and existing “effect-generating activities”.

5.0 Conclusion

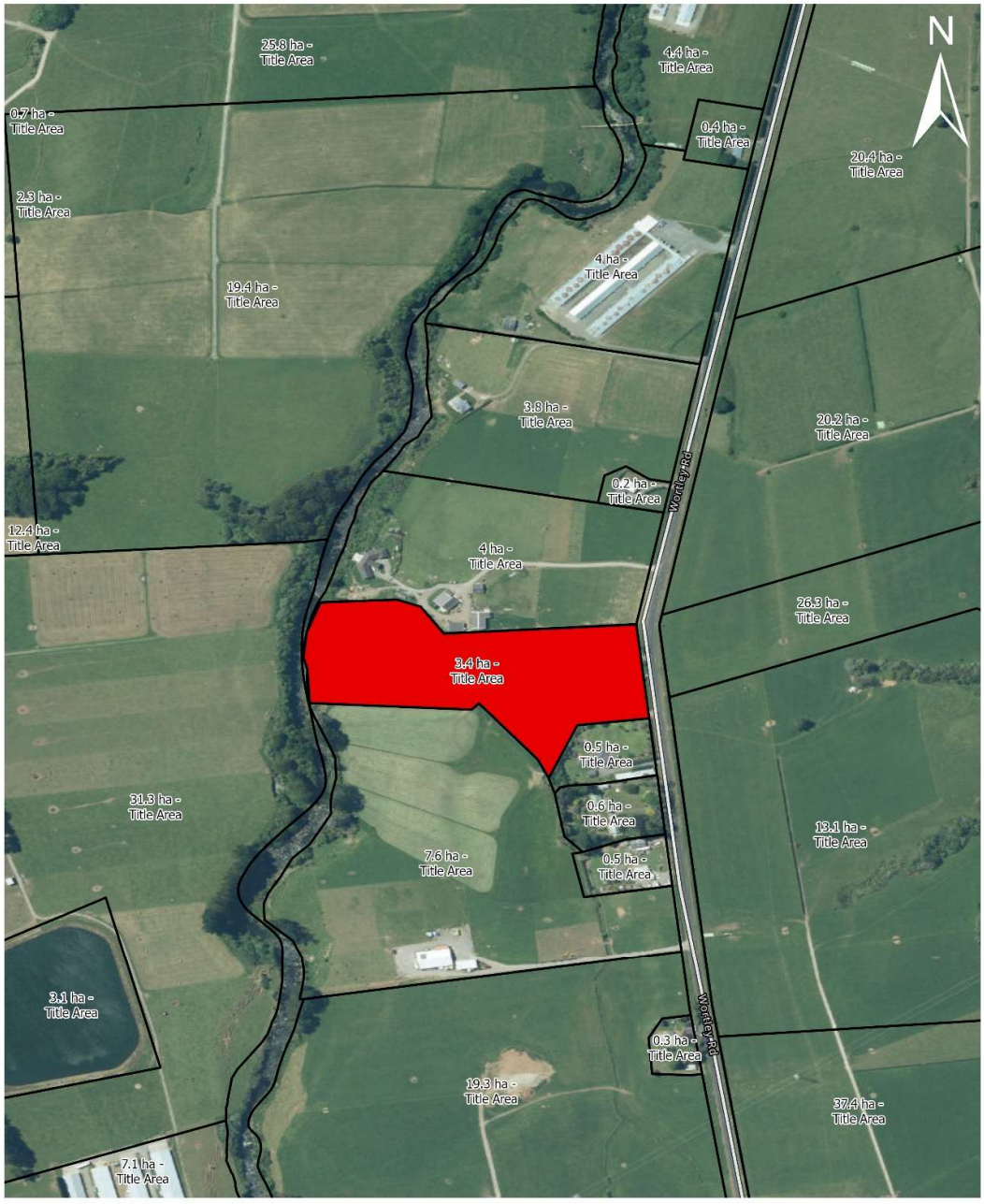
AgFirst considers that the proposed subdivision meets the requirements of the NPS-HPL. The subdivision has no impact on the long-term productive capacity of the Subject Site. There will be no meaningful loss of highly productive land in the district. As there is no change to the productive capacity or use of the land, there will be no change to any potential reverse sensitivity effects. Overall, AgFirst consider that the proposed subdivision meets Clause 3.8 of the NPS-HPL.

6.0 Appendices

6.1.1 Breakdown of Productive and Non-Productive Areas in Subject Site

AGFIRST	**Aaron & Tara Stephens**	Scale: 1:1,500	**Legend** Property Boundary 3m set back NES-FW Lawn Unproductive Areas Buildings Driveway Vegitation Named_rivers Unnamed tributaries
	Eagle Technology, LINZ, StatsNZ, NIWA, Natural Earth, © OpenStreetMap contributors., Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors	0 18.8 37.5 Meters	
Author : BD	Coordinate System : NZGD 2000 New Zealand Transverse Mercator	Date: 5/11/2025	

6.1.2 LINZ Titles Existing Land Parcels/Lifestyle Blocks surrounding Subject Site



AGFIRST	**Aaron & Tara Stephens**	Scale: 1:4,000	**Legend**
	Eagle Technology, LINZ, StatsNZ, NIWA, Natural Earth, © OpenStreetMap contributors., Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors	0 50 100 Meters	LINZ Property Title; Property Boundary
Author : BD	Coordinate System : NZGD 2000 New Zealand Transverse Mercator	Date: 5/11/2025	

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