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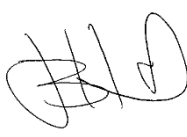
# Brymer Farms Ltd NPS-HPL Assessment

Prepared for  
Brymer Farms Limited

Branden Darlow & Jeremy Hunt  
August 2026

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## Document Quality Assurance

|                       |                                                                  |                                                                                     |
|-----------------------|------------------------------------------------------------------|-------------------------------------------------------------------------------------|
| Prepared by:          | Branden Darlow<br>B. Ag Bus<br>MIRPNZ<br>Agribusiness Consultant |  |
| Reviewed by:          | Jeremy Hunt<br>B.SC (Env)<br>MIRPNZ<br>Agribusiness Consultant   |  |
| Approved for release: | Jeremy Hunt<br>B.SC (Env)<br>MIRPNZ<br>AgFirst Director          |  |
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| Date:                 | 19 August 2026                                                   |                                                                                     |

I am Jeremy Hunt, an Agribusiness Consultant with AgFirst. I hold a bachelor of Science and have 8 years of professional experience in agricultural productivity and resource assessments. My qualifications and relevant experience are set out in further detail in my curriculum vitae - Appendix A to this report.

While this report has not been prepared for an Environment Court proceeding, I confirm that I have read and understood the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023, and I agree to comply with it.

I acknowledge that, as an expert, I have an overriding duty to assist the decision maker impartially on matters within my area of expertise. In preparing this report, I have exercised my independent professional judgement, and the opinions I express are my own. I understand that my duty as an expert is not to advocate for the interests of the applicant or any other party.

I confirm that the matters addressed in this report are within my area of expertise, except where I expressly state that I am relying on information or opinions provided by another person. I have not omitted to consider any material facts known to me that might alter or detract from the opinions expressed in this report.

# Contents

|       |                                                                                             |    |
|-------|---------------------------------------------------------------------------------------------|----|
| 1.0   | Executive Summary.....                                                                      | 4  |
| 2.0   | Background .....                                                                            | 6  |
| 3.0   | Project Description .....                                                                   | 8  |
| 4.0   | Property Summary and Existing Land Use.....                                                 | 10 |
| 5.0   | National Policy Statement .....                                                             | 10 |
| 5.1   | Regulatory Framework for Highly Productive Land .....                                       | 10 |
| 5.2   | NPS-HPL Clause 3.10 - Exemption for HPL subject to permanent or long-term constraints ..... | 11 |
| 6.0   | Assessment of Land Use Capability .....                                                     | 13 |
| 6.1   | Role and Limitations of Land Use Capability Mapping .....                                   | 13 |
| 6.2   | NZLRI Land Use Capability Classification .....                                              | 13 |
| 6.3   | Manaaki Whenua Soil Maps .....                                                              | 17 |
| 6.4   | Site Specific Mapping and LUC Assessment .....                                              | 20 |
| 6.5   | Land Use Capability Summary .....                                                           | 22 |
| 7.0   | Assessment against the NPS-HPL.....                                                         | 25 |
| 7.1   | Economic Analysis .....                                                                     | 26 |
|       | Summary.....                                                                                | 26 |
|       | Pastoral grazing .....                                                                      | 26 |
|       | Development costs for pastoral grazing.....                                                 | 28 |
| 7.2   | Economic Viability.....                                                                     | 29 |
| 7.3   | Permanent or Long-Term Constraints.....                                                     | 33 |
| 7.4   | Avoidance of Significant Loss, Fragmentation and Reverse Sensitivity .....                  | 35 |
| 7.5   | Net Benefits from Urban Development Proposed on the Site.....                               | 37 |
|       | Environmental .....                                                                         | 37 |
|       | Social.....                                                                                 | 38 |
|       | Cultural.....                                                                               | 39 |
|       | Economic .....                                                                              | 39 |
|       | Will the benefits outweigh the costs? .....                                                 | 40 |
| 7.6   | Reasonably Practicable Options to Overcome Constraints and Economic Viability               | 41 |
| 7.6.1 | Alternative options to retain productive capacity .....                                     | 41 |
|       | Arable .....                                                                                | 41 |
|       | Dairy farming or dairy support .....                                                        | 43 |
|       | Commercial Vegetable Production .....                                                       | 44 |
|       | Horticulture.....                                                                           | 44 |

|                                                 |                                                     |    |
|-------------------------------------------------|-----------------------------------------------------|----|
| 7.6.2                                           | Improved land management strategies .....           | 45 |
| 7.6.3                                           | Alternative production strategies .....             | 46 |
| 7.6.4                                           | Water efficiency or storage methods .....           | 46 |
| 7.6.5                                           | Boundary adjustments (including amalgamation) ..... | 46 |
| 7.6.6                                           | Lease arrangements .....                            | 47 |
| 7.6.7                                           | Summary .....                                       | 48 |
| 7.7                                             | Evaluation of Reasonably Practical Options .....    | 48 |
| 8.0                                             | Summary .....                                       | 50 |
| Appendix A: Qualifications and Experience ..... |                                                     | 52 |
| Jeremy Hunt.....                                |                                                     | 52 |
| Branden Darlow .....                            |                                                     | 54 |

## 1.0 Executive Summary

Brymer Farms Limited (Brymer) is seeking to develop approximately 81 ha of land on the southwestern edge of Hamilton City for a master-planned urban community. The Development Site is located predominantly within the Waikato District and comprises land currently utilised for pastoral grazing and annual maize production. The proposed development will provide approximately 1,043 residential units across a range of housing typologies and densities, together with neighbourhood-scale commercial activities, open space networks, ecological restoration areas and supporting infrastructure.

AgFirst Waikato (2016) Ltd (AgFirst) has been engaged by Brymer to undertake an assessment of the Development Site against the National Policy Statement for Highly Productive Land (NPS-HPL). This assessment considers whether the Development Site satisfies the exemption pathway under Clause 3.10 of the NPS-HPL, which enables subdivision, use or development of Highly Productive Land (HPL) where permanent or long-term constraints mean the land cannot be economically viable for land-based primary production for at least 30 years.

The NZLRI identifies approximately 44.4 ha (55%) of the Development Site as LUC Class 2 land, which is classified as HPL under the transitional provisions of the NPS-HPL. The remaining 36.5 ha (45%) comprises LUC Class 4 land and is not classified as HPL. Detailed site-specific investigations undertaken by Landsystems identified significant wetness, drainage, flooding and erosion limitations across the Site.

While approximately 44 ha of the Development Site is mapped as HPL, only 2.5 ha meets the Waikato District Plan definition of high-class soil. The balance of the mapped HPL is constrained by poor drainage, peat soils, seasonal wetness and flooding, substantially reducing its versatility and productive capacity.

Significant constraints for land-based primary production have been identified, which affect the Development Site, including:

- Only 2.5 ha (3.2%) meeting the Waikato District Plan definition of high-class soil.
- The majority of the Site is constrained by poor drainage, seasonal wetness, high water tables and erosion susceptibility, which significantly reduce land use versatility and productive capacity.
- An indicative budget across the entire Development Site under pastoral grazing land use, using industry information, shows the Development Site is not economically viable, with net property losses of between **-\$61,570** and **-\$115,846** or a cumulative loss of **-\$177,416**.
- Reverse sensitivity effects from surrounding urban encroachment.

We conclude that all the requirements under clause 3.10 of the NPS-HPL can be met. In particular, overall, AgFirst considers that, having regard to reasonably practicable available options (as required):

- As outlined above, there are permanent or long-term constraints that mean the land proposed for development cannot viably be used for land-based primary production for at least 30 years.
- The development would avoid significant loss of productive capacity of highly productive land in the Waikato District; the fragmentation of large areas of highly productive land; and any potential reverse sensitivity effects on surrounding land-based primary production.
- The environmental, social, cultural and economic benefits of the 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.

## 2.0 Background

Brymer Farms Limited (Brymer) is seeking to develop 80.9933 hectares (ha) of land on the southwestern outskirts of Hamilton City (Development Site) to allow the development of a master planned community. Presented in Figure 1. Legal boundaries and Waikato District Council zoning for Brymer Farms Ltd. is the outline of the Development Site in relation to other land use zones in the immediate area for the Waikato District. Adjoining the Development Site to the north and east is zoned as General Residential and Sports and Recreation Open Space in the Hamilton City Operative District Plan (2026)<sup>1</sup>, while land to the south and west is zoned as Rural in the Waikato Operative District Plan (2013)<sup>2</sup>. 80.9256 ha of the Development Site is located within the Waikato District and zoned Rural, with the remainder (0.0677 ha) falling within the Hamilton City Council General Residential Zone.

The area and properties subject to this assessment are legally described in Table 1.

*Table 1. Description of Parcels within the Development Site and zoning*

| Zoning              | Legal Description                   | Title Number | Area (ha)      |
|---------------------|-------------------------------------|--------------|----------------|
| General Residential | Lot 22 DPS 79526                    | SA63C/424    | 0.0677         |
| Rural               | Part Lot 2 DP 18355                 | SA910/139    | 18.3752        |
| Rural               | Lot 3 DP 385271 and Lot 1 DPS 87291 | 341666       | 62.4060        |
| Rural               | Allotment 365 Parish of Pukete      | SA6D/233     | 0.1444         |
| <b>TOTAL</b>        |                                     |              | <b>80.9933</b> |

AgFirst Waikato (2016) Ltd (AgFirst) has been engaged by Brymer to undertake a land productivity assessment in relation to the site of its proposed Fast-track development. This includes an assessment of the Development Site against the National Policy Statement for Highly Productive Land (NPS-HPL). This assessment considers whether the Development Site satisfies the exemption pathway under Clause 3.10 of the NPS-HPL, which enables subdivision, use or development of Highly Productive Land (HPL) where permanent or long-term constraints mean the land cannot be economically viable for land-based primary production for at least 30 years.

AgFirst is a suitably qualified agribusiness consultancy with proven experience in completing assessments relating to productive capacity, primary production and soil versatility. Our assessment should be read in conjunction with the other assessments which accompany the Development Site's consent application, including the planning and economic analyses.

<sup>1</sup> <https://hamilton.isoplan.co.nz/eplan/property/1806556/1792480/5825267/5806724/0/103>

<sup>2</sup> <https://waikatodc.spatial.t1cloud.com/spatial/intramaps/?configId=e6b2fca7-5d63-4aed-b49c-c32dc8cb1002&project=Public&module=Operative%20District%20Plan&layer=Property>

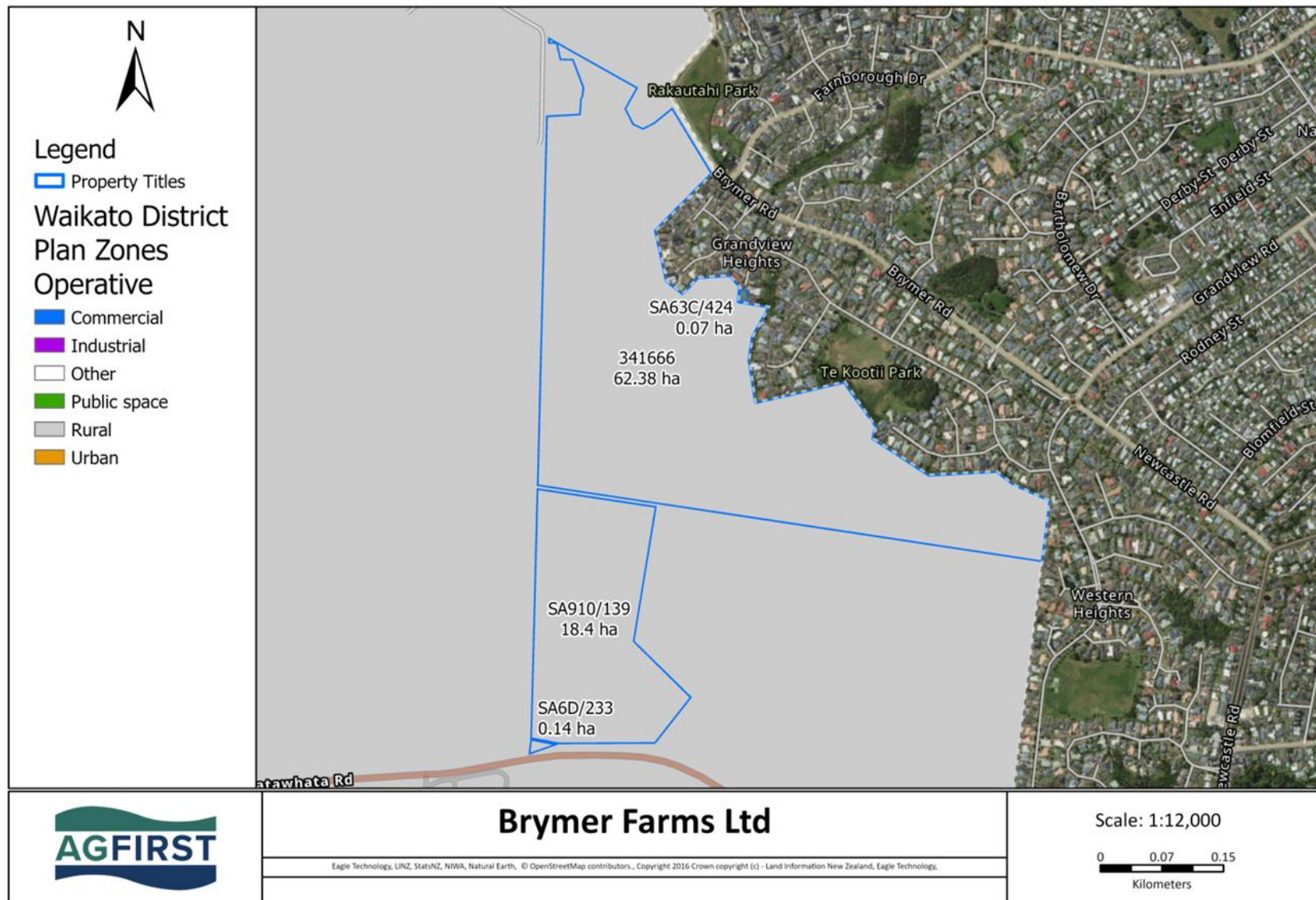


Figure 1. Legal boundaries and Waikato District Council zoning for Brymer Farms Ltd.

## 3.0 Project Description

The Brymer Farms Limited development (Brymer) is a comprehensively planned, multi-staged residential development providing for the urbanisation and subdivision of the project site. The Project is the subject of a Notice of Decision by the Minister, dated 4 September 2025, to refer the Project. It seeks the land use, environmental, subdivision and associated infrastructure consents required to enable the development to be delivered progressively and in a coordinated manner.

The Project will provide approximately 1,043 residential units, including approximately 248 apartment units, across a range of housing typologies and densities. Housing will comprise a mix of terraced, duplex and detached dwellings, conventional and compact residential lots, irregular lots, and eight larger rural-residential lots. This range of typologies is intended to provide housing choice while enabling the development pattern to respond appropriately to the physical characteristics, environmental features and constraints of the site.

The master plan also provides for two mixed-use commercial sites, identified as C1 and C2, which will form a neighbourhood scale commercial component within the development. C1 will provide approximately 910 m<sup>2</sup> of ground-floor commercial gross floor area (GFA), with 24 two bedroom apartments above. C2 will provide approximately 1,274 m<sup>2</sup> of ground-floor commercial GFA, with 16 two bedroom apartments above. Both sites will incorporate basement car parking, dedicated vehicle access, servicing areas and landscaping. Collectively, C1 and C2 will provide approximately 2,184 m<sup>2</sup> of commercial GFA and 40 apartments, supporting the day-to-day needs of residents and contributing to a mixed-use neighbourhood environment.

The development will be supported by the necessary transport and three-waters infrastructure. Water supply and wastewater servicing will connect to the IAWAI reticulated networks, with internal reticulation and associated infrastructure established progressively as development is staged. This may include pump stations, storage, reservoirs and mains, where required. Stormwater will be managed through an integrated stormwater management system, with discharge ultimately occurring to the receiving environment within the Waikato District. The stormwater system will incorporate appropriate treatment, attenuation and conveyance measures and will integrate, where appropriate, with proposed wetlands, watercourses, stormwater reserves and other water-sensitive design features throughout the development.

Implementation of the Project will require staged development related earthworks to establish suitable building platforms, a well connected road network, infrastructure corridors, reserves and other components of the master plan. These works will include site formation, cut and fill, retaining, erosion and sediment control, and other enabling works required to facilitate the staged subdivision and development of the site. The proposal will also require the undergrounding of existing power lines within the Applicant's site.

A significant component of the Project is the provision and enhancement of open space and ecological values. The development will provide an integrated network of public and recreational open spaces, pedestrian connections, wetlands, watercourses, stormwater reserves, landscaped areas and retained vegetation. Environmental and ecological mitigation and offsetting will also be provided where required to address effects arising from the development and to support the protection, restoration and enhancement of ecological values across the site and wider receiving environment. Where appropriate, these measures will be integrated with the development's open-space and stormwater networks.

The overall open-space and movement network will connect with the surrounding urban environment and existing reserves, including Rakautahi Park, Brymer Glen Reserve, Brymer Park and Te Kootii Park. These connections will provide links between residential neighbourhoods, commercial and community areas, recreational spaces and the wider transport network.

Overall, Brymer is a large scale, comprehensively planned urban development that will enable approximately 1,043 residential units, including approximately 248 apartments, together with approximately 2,184 m<sup>2</sup> of commercial GFA. The Project encompasses the subdivision and development of the land and the associated development related earthworks, transport and access infrastructure, water supply and wastewater connections to the IAWAI reticulated networks, stormwater management and discharge, ecological mitigation and offsetting, landscaping, open space, recreation, and other supporting infrastructure necessary to establish the new community.

The Project will be implemented through a multi-staged consenting and development framework, enabling subdivision, land use and infrastructure works to proceed progressively while ensuring that each stage is appropriately serviced and integrated with the wider development and surrounding environment.

The development will be subject to a comprehensive suite of proposed conditions of consent, including a design guide, developed with input from the Applicant's relevant technical and environmental specialists. These conditions will provide the framework for managing the construction, staging, servicing and operation of the development, including earthworks, transport, three-waters infrastructure, stormwater discharges, ecological effects and offsetting, landscaping and open space, and other potential environmental effects associated with the Project.

Collectively, the master plan, supporting technical assessments and proposed conditions of consent provide an integrated framework for the staged delivery and management of Brymer, including measures to avoid, remedy or mitigate adverse environmental effects and, where appropriate, provide environmental offsets.

## 4.0 Property Summary and Existing Land Use

The Development Site has a total area of approximately 81 ha and is predominantly zoned Rural within the Waikato District and is therefore subject to assessment under the NPS-HPL. For this assessment, and allowing for rounding, the Development Site has been assessed as a total area of approximately 81 ha.

The Development Site comprises two larger Rural titles. Part Lot 2 DP 18355 is approximately 18 ha, which contains two dwellings and a mix of pastoral grazing and arable maize cropping. Lot 3 DP 385271 and Lot 1 DPS 87291 is an approximately 62 ha vacant block currently utilised for pastoral grazing and arable maize cropping. There is a smaller title of 0.1444 ha to the southwest of the Development Site (Allotment 365 Parish of Pukete), which is currently utilised as pastoral land. Additionally, but not part of the assessment site, is Lot 22 DPS 79526. This is a very small 0.0677 ha vacant parcel to the northeast, which falls into the Hamilton City Council boundary, and is not zoned Rural and does not need to be assessed against the NPS-HPL.

Landsystems identified areas of modified and anthropic soils associated with existing development, dwellings, accessways and other land modifications. These areas are considered to have limited or no productive capacity for land-based primary production and are therefore classified as non-productive land. The extent of these areas are discussed further in Section 6.4 and 6.5 and illustrated in Figure 7.

The legal boundaries of the Development Site are shown in Figure 2. AgFirst visited the Site on 21 May 2026 to assess the existing land uses and productive capacity of the Development Site.

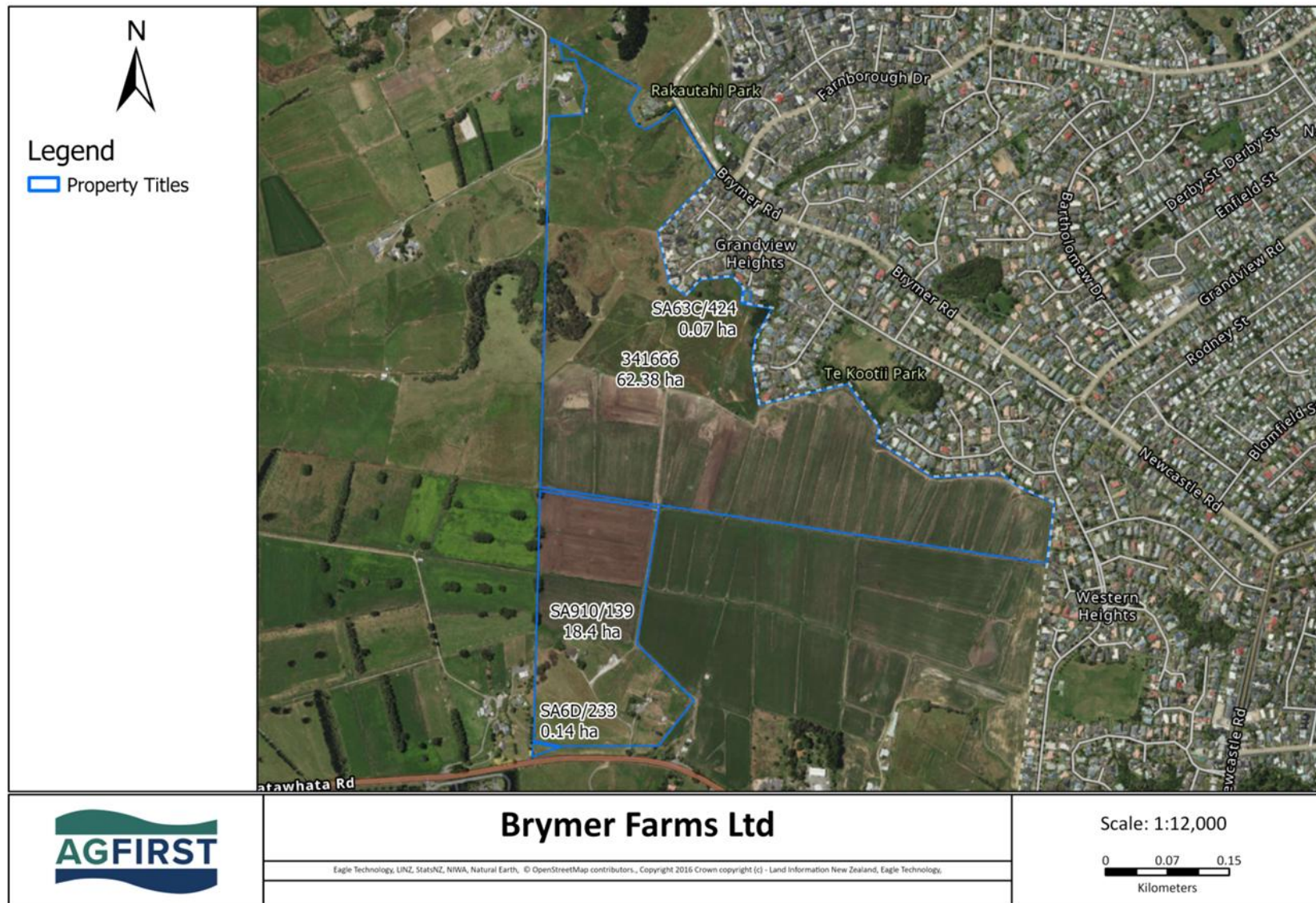


Figure 2. Property titles for the Development Site.

## 5.0 National Policy Statement

### 5.1 Regulatory Framework for Highly Productive Land

The NPS-HPL came into effect on 17 October 2022 and establishes a nationally consistent framework for identifying and managing highly productive land (HPL). Its purpose is to protect HPL for land-based primary production while providing for specified exceptions and exemptions.

The interim definition of HPL in Clause 3.5(7) was amended in December 2025, with the amendments coming into force on 15 January 2026. The amendments retained Land Use Capability (LUC) classification 1 and 2 land within the interim HPL definition but introduced additional exclusions for certain LUC 3 land. In particular, LUC 3 land is no longer treated as HPL where a resource consent application for subdivision, use or development (other than rural lifestyle development) has been lodged on or after 17 October 2022. However, this amendment only applies to LUC 3 land identified through the interim New Zealand Land Resource Inventory (NZLRI) mapping provisions of Clause 3.5(7) and does not affect the HPL status of the Development Site, as discussed below.

Clause 3.5(7) states:*(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:*

*(a) Is:*

- (i) zoned general rural or rural production at the commencement date; and*
- (ii) LUC 1, 2, or 3 land, but*

*(b) Is not:*

- (i) identified for future urban development at the commencement date; or*
- (ii) subject to a council initiated, or an adopted, notified plan change to rezone it from general rural or rural production to urban or rural lifestyle at the commencement date; or*
- (iii) subject to a resource consent application for subdivision, use or development on LUC 3 land for any activity other than rural lifestyle, where that consent has been lodged at or after the commencement date.*

**LUC 1, 2, or 3 land** is defined as LUC Classification 1, 2, or 3, as mapped by the NZLRI or by any more detailed mapping that uses the LUC classification.

**Land-based primary production** means *production from agricultural, pastoral, horticultural or forestry activities that are reliant on the soil 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 and 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.*

In summary, the NPS-HPL document closely aligns with the Waikato Operative District Plan (ODP), where it identifies LUC Classes 1, 2, and 3 as being the most versatile land, with the fewest limitations on its use, and therefore HPL.

Clause 3.7 of the NPS-HPL states *“Territorial authorities must avoid rezoning of highly productive land as rural lifestyle, except as provided in clause 3.10”*. The applicant is not seeking rural lifestyle rezoning, and therefore, pathway 3.7 is not applicable.

Clause 3.8 of the NPS-HPL provides a pathway for subdivision where the overall productive capacity of highly productive land is retained over the long term. As the proposed urban development would permanently remove the rural productive potential of the Development Site, the proposal does not rely on Clause 3.8.

Clause 3.9 of the NPS-HPL states, *“Territorial authorities must avoid the inappropriate use of highly productive land that is not land-based primary production.”* The proposed development does not meet any of the exceptions specified in Clause 3.9, and therefore, Clause 3.9 has not been used to support the proposed urban use of the Development Site.

Clause 3.10 sets out the exemptions for subdivision, use or development of HPL subject to permanent or long-term constraints to be used for non-productive purposes. The criteria that must be met to enable this exemption are listed in the following section.

## 5.2 NPS-HPL Clause 3.10 - Exemption for HPL 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, including 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 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 land holding 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.*

The criteria of **Clause 3.10** are assessed in detail in the following sections of this assessment.

## 6.0 Assessment of Land Use Capability

### 6.1 Role and Limitations of Land Use Capability Mapping

The NZLRI provides a nationally consistent, regional-scale assessment of land capability. LUC mapping is primarily intended to inform strategic and regional planning and is typically undertaken at a scale not suited to site-specific assessment. While LUC classification identifies potential versatility of soils, it does not account for:

- site-specific constraints such as internal fragmentation, existing buildings, or modified soils;
- the functional availability of land for land-based primary production;
- economic viability or infrastructure requirements; or
- surrounding land use and opportunities for integration or expansion.

Accordingly, while LUC 3 mapping is relevant, it is not determinative of whether land functions as highly productive land in practice or whether it should be subject to the full application of NPS-HPL provisions.

### 6.2 NZLRI Land Use Capability Classification

The LUC classification system has been used in New Zealand to help achieve sustainable land development and management on farms. The purpose of the LUC classification is to assess the suitability of the land for primary production. Determining the presence of HPL as defined under the LUC classification requires consideration of a range of characteristics. The LUC classification categorises land areas or polygons into classes, subclasses and units according to the land's capability to sustain productive use. The LUC is based on an assessment of the physical factors (rock type, soil, slope, present type and severity of erosion, and vegetation), climate, the effects of past land use, and the potential for erosion. This is summarised in Figure 3 below.

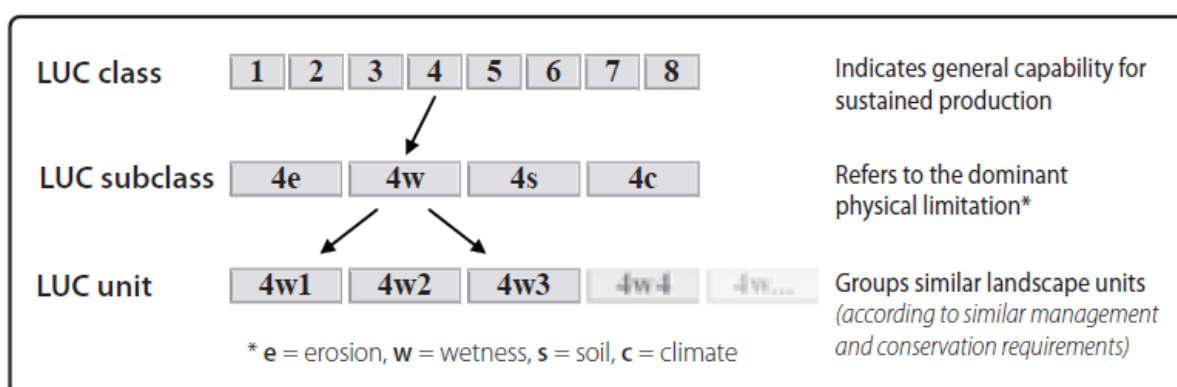


Figure 3. Components of the Land Use Capability Classification<sup>3</sup>

<sup>3</sup> Lynn, I.H, Manderson, A.K, Page, M.J, Harmsworth, G.R, Eyles, G.O, Douglas, G.B, Mackay, A.D, Newsome, P.J.F. (2009). Land Use Capability Survey Handbook – a New Zealand handbook for the classification of land 3rd ed. Hamilton, AgResearch; Lincoln, Landcare Research; Lower Hutt, New Zealand. GNS Science.

The NZLRI maps are designed for use at a 1:63,000. This means that 1 cm<sup>2</sup> of published map covers 36.69 ha. Following the observation guidelines, this equates to, at most, one observation per 36.69 ha and at least one observation per 146.76 ha. Therefore, it should only be treated as an indicator for LUC at the site. The observation guidelines are in reference to one observation site per 1 cm<sup>2</sup> of published map, with a minimum acceptable limit of one site per 4 cm<sup>2</sup> of published map according to New Zealand soil mapping protocols and guidelines (Grealish, 2019).

Based on the NZLRI mapping information, the Development Site comprises Hamilton clay loam on strongly rolling slopes with an LUC classification of 4e2, Kaipaki peaty loam on flat to gently undulating slopes with an LUC classification of 2w2, and Rukuhia peat on flat to gently undulating slopes with an LUC classification of 2s5.

The NZLRI LUC distributions on the Development Site are presented in Figure 4 below. LUC units 2w2 and 2s5 comprise approximately 55% of the Development Site and are classified under the interim definition as HPL. However, these soils do not meet the definition of high-class soils under the proposed Waikato District Plan (Decisions Version) or Regional Policy Statement<sup>4</sup>. The remaining 45% of the Development Site comprises LUC unit 4e2, which is not classified as HPL nor high class soil.

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<sup>4</sup> Those soils in Land Use Capability Classes I and II (excluding peat soils) and soils in Land Use Capability Class IIIe1 and IIIe5, classified as Allophanic Soils, using the New Zealand Soil Classification.

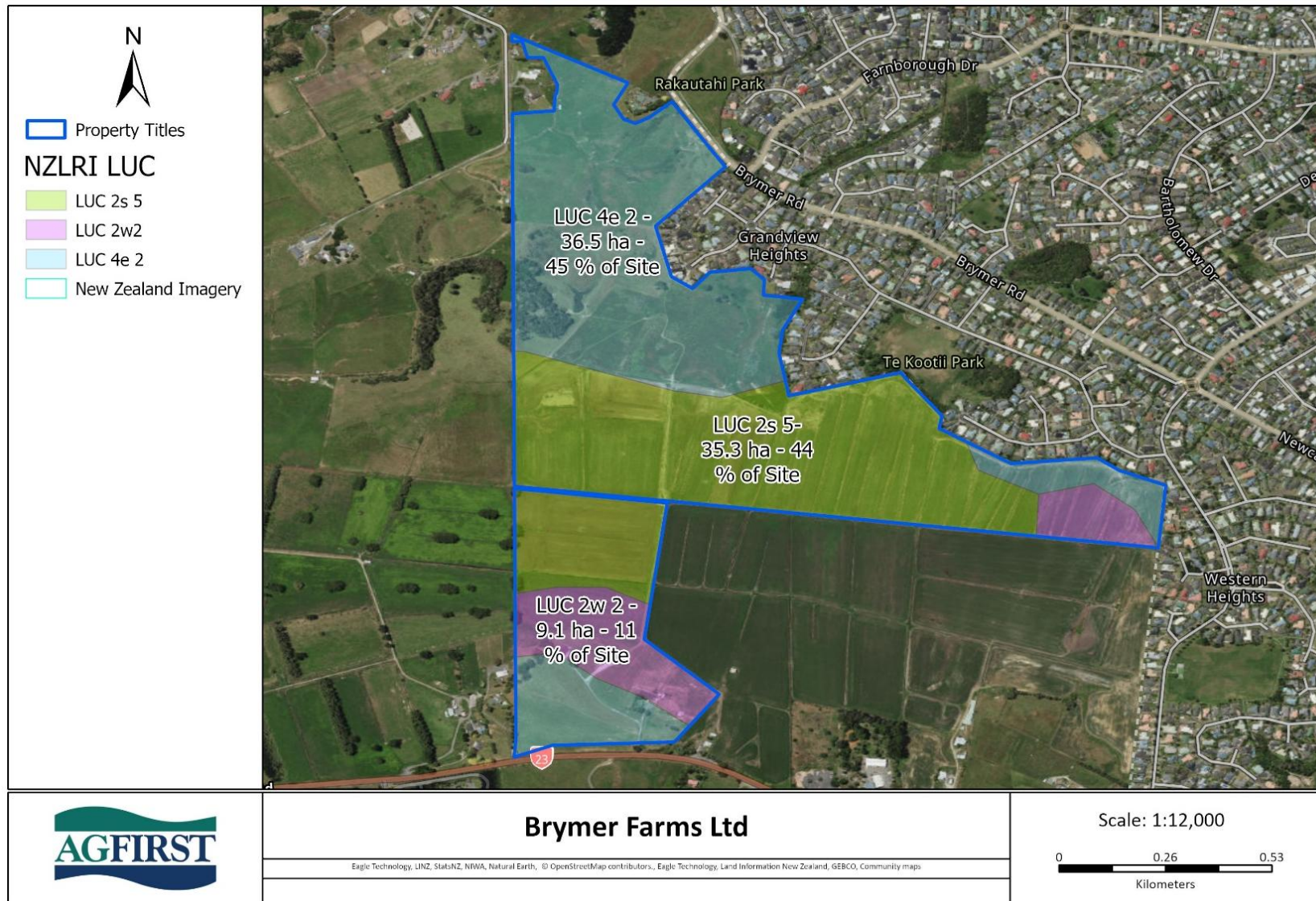


Figure 4. NZLRI Land Use Capability Classification Map for Brymer Farms Ltd.

## 6.3 Manaaki Whenua Soil Maps

To further understand the soils present across the Development Site regarding productive capacity, AgFirst has reviewed the Manaaki Whenua – Landcare Research S-Map and Land Information New Zealand (LINZ) database. While not sufficient to reclassify the soils as per the NPS-HPL, these maps, also designed for use at a 1:50,000 scale, have a finer resolution achieved by incorporating the best available spatial information from soil surveys or new mapping, and have a much wider range of soil properties<sup>5</sup>.

S-Map indicates the Development Site is predominantly comprised of deep, poorly to very poorly drained soils, with smaller areas of moderately well and imperfectly drained soils. The dominant soil types are Kaipaki, Hamilton, and Rotokauri soils, which together account for approximately 76% of the Site.

The distribution of soils as mapped by S-Map, presented in Figures 5 and 6 below, differs from the NZLRI mapping. Notably, the majority of the area identified as HPL in the NZLRI mapping is delineated as very poorly drained gley soils within the S-Map dataset.

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<sup>5</sup> [S-map Online FAQ](#) | [S-Map Online](#) | [Manaaki Whenua - Landcare Research](#)

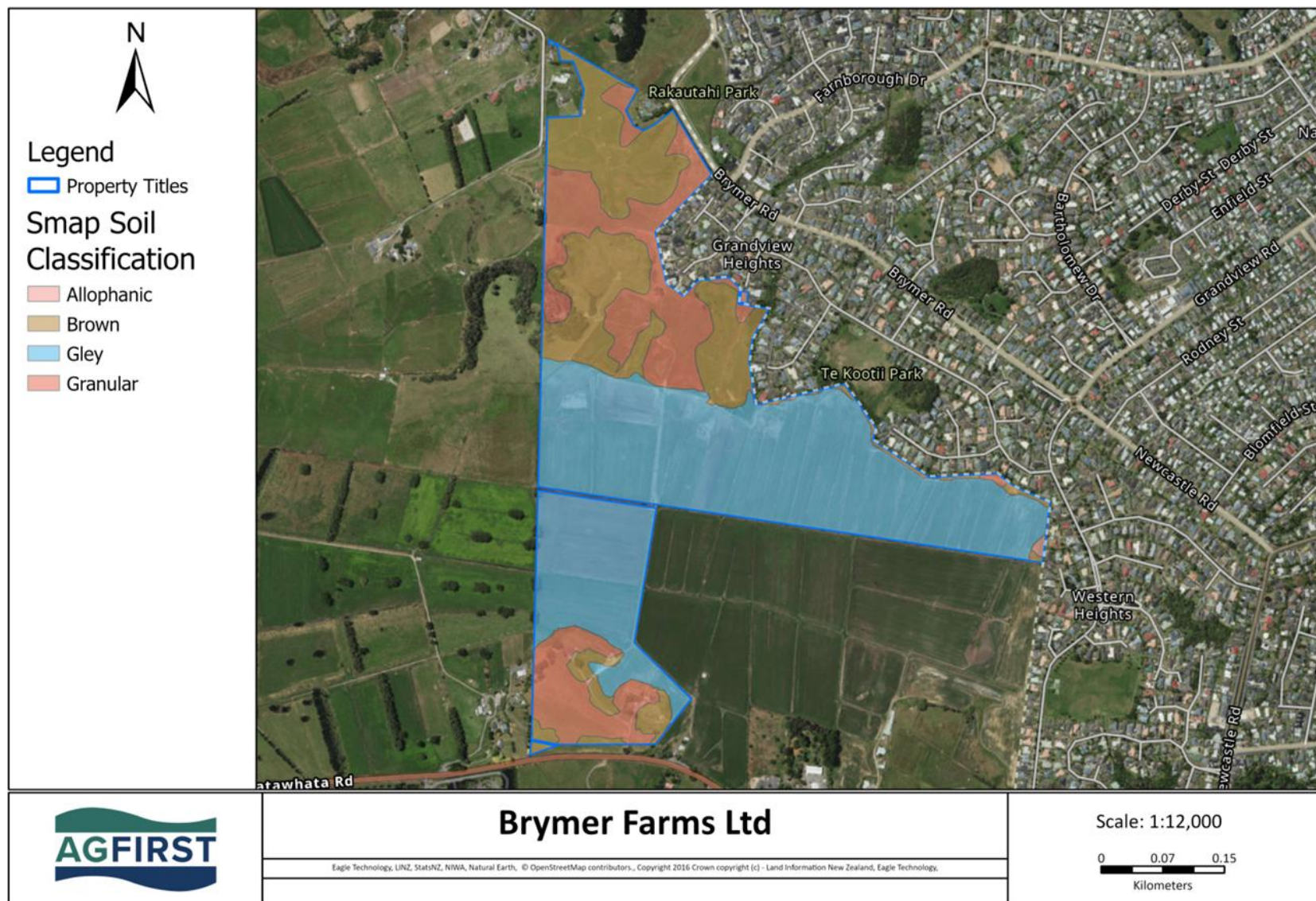


Figure 5. Soil classification representation of Brymer Farms Ltd.

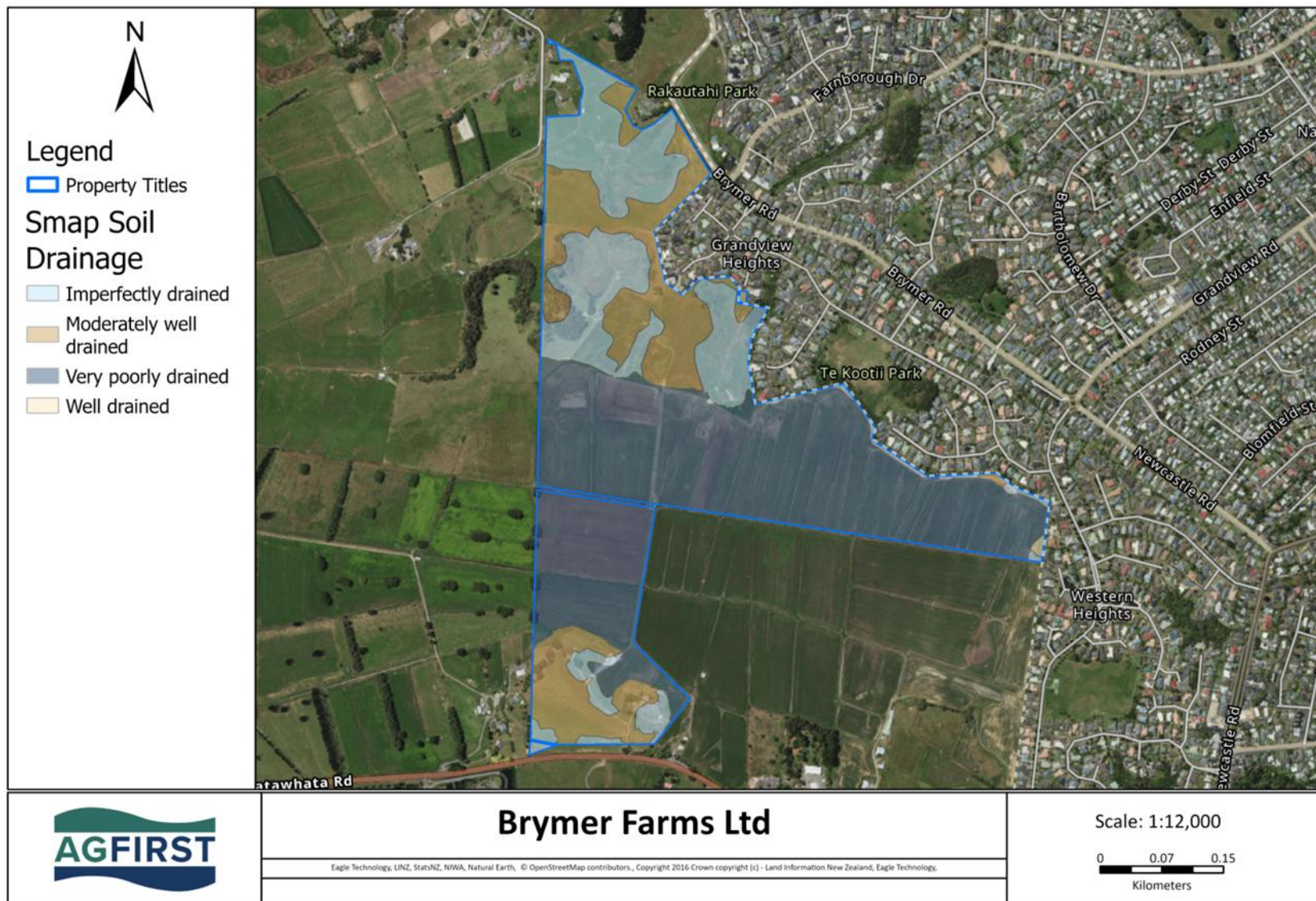


Figure 6. Soil drainage representation of Brymer Farms Ltd.

## 6.4 Site Specific Mapping and LUC Assessment

The NZLRI LUC maps are not intended for farm-scale interpretation. Therefore, soil expert Dr Reece Hill of Landsystems was engaged by Brymer Farms to undertake an assessment and review the LUC and soils of the Development Site. This section presents the results and outcomes from these reports. The site-specific LUC unit descriptions and map are presented in Table 2 and Figure 7 below.

Key observations from these reports identify the following:

- The LUC assessment has been undertaken in accordance with standard accepted guidelines (Milne et al., 1993 and Lynn et al., 2009).
- The Site is characterised by challenging topography, with varied slopes that create a diverse but complex terrain.
- Slopes predominantly range from gentle gradients in the central-western and southern portions, necessitating specific geotechnical and structural engineering approaches.
- The Site contains several prominent hydrological features including a major existing drain that runs east west across the Site, forming a significant barrier for internal vehicular and pedestrian connectivity, necessitating infrastructure solutions such as bridges or culverts.
- Much of the Development Site identified as HPL has significant wetness limitations.
- The Wetness limitations significantly reduce land versatility for prolonged periods.
- These areas can receive surface water from the surrounding land.

Although these areas have extensive drainage networks, the land remains wet for prolonged periods. Applying the Proposed Waikato District Plan – Operative in Part definition for high class soil, only the LUC 2w3 (2.1 ha) and 3e1 (0.4 ha) land is classified as high class soil. All the remaining soils within the Subject Site are not high-class soils.

The susceptibility to wetness and flooding makes the Development Site vulnerable to pugging from grazing livestock and limits machinery access for arable cropping.

Land identified as high-class soils are discrete and predominantly associated with LUC 4e2 and 6e2, which have associated erosion risks and are therefore not suitable for cropping.

Presented in **Error! Reference source not found.** Below are the soils and key features that were identified by Landsystems.

*Table 2. Soils identified within the Development Site by Dr Hill (Landsystems)*

| Soil Type                          | Parent Material          | Soil Drainage           | Slope Class   | LUC Unit | NPS-HPL Highly Productive Land |
|------------------------------------|--------------------------|-------------------------|---------------|----------|--------------------------------|
| Kaipaki peaty loam                 | Peat over alluvium       | Poorly drained          | A (0-3°)      | 2w2      | Highly productive land         |
| Rotokauri clay loam                | Hamilton ashes colluvium | Imperfectly drained     | A+B (0-7°)    | 2w3      | Highly productive land         |
| Kainui silt loam                   | Tephra on Hamilton ashes | Well drained            | C (8 - 15°)   | 3e1      | Highly productive land         |
| Hamilton clay loam                 | Hamilton ashes           | Moderately well drained | C (8-15°)     | 3e3      | Highly productive land         |
| Rukuhia peat                       | Peat                     | Very poorly drained     | A (0-3°)      | 3w1      | Highly productive land         |
| Rotokauri clay loam                | Hamilton ashes colluvium | Poorly drained          | A+B (0-7°)    | 3w2      | Highly productive land         |
| Hamilton clay loam                 | Hamilton ashes           | Moderately well drained | D (16-20°)    | 4e2      | Not highly productive land     |
| Un-named humic silt loam           | Mixed alluvium           | Very poorly drained     | A (0-3°)      | 4w1      | Not highly productive land     |
| Kaipaki peaty loam                 | Peat over alluvium       | Very poorly drained     | A (0-3°)      | 4w2      | Not highly productive land     |
| Hamilton clay loam                 | Hamilton ashes           | Moderately well drained | E+F (0-7°)    | 6e2      | Not highly productive land     |
| Anthropic soil                     | Mixed fill               | Imperfectly drained     | A +B (0 - 7°) | 4s       | Not highly productive land     |
| Non-productive land/modified soils | -                        |                         |               |          | Not highly productive land     |

Dr Hill concluded that “The soils on the Brymer Road site consist of moderately well drained Hamilton clay loam formed in Hamilton ashes on rolling to steep slopes, imperfect to poorly drained Rotokauri clay loam on flat to undulating slopes, Kaipaki peaty loam, Rukuhia peat and an un-named humic silt loam on flat to gently undulating slopes. The balance of the site is classed as non-productive land.”

“Applying the National Policy Statement for highly productive land, the LUC 2w2, 2w3, 3w1, 3e1 and 3e3 land is defined as highly productive land. The LUC 4e2, 4w1, 4w2 and 6e2 land and the non-productive land are not highly productive land. Although the land on the Brymer Road site does contain highly productive land when mapped at property scale, the small areas of LUC 3e1, 3e3 and 2w3 are associated with the LUC 4e2 areas and individually have limited productive capacity.”

“Much of the highly productive land has soil wetness limitations that restrict the long-term land use options for the site to summer cropping and pastoral use. Although drainage has been put in place, the land remains wet at least seasonally and in places where water drains from surrounding steep slopes, the wetness limitation is likely to be present throughout most of the year.”

The observations made by AgFirst during the site visit are consistent with the observations made by Landsystems.



Figure 7. Site-Specific LUC Map (Landsystems)

## 6.5 Land Use Capability Summary

While the extent of HPL identified across the Development Site remains broadly similar to that mapped by the NZLRI, the detailed on-site assessment provides a significantly more refined understanding of the land resource. The NZLRI mapping identifies the Site as predominantly comprising LUC 2w2 and 2s5 land classified as HPL. Site-specific mapping demonstrates that much of the area mapped under the NZLRI as LUC 2 land is classified as Class 3 land, reflecting the presence of greater physical limitations. Consequently, while approximately 44 ha of the Development Site retains the interim HPL status under the NPS-HPL framework, 96.8% of this land is not considered high-class soil under the WDP-OiP definition.

The WDP-OiP assessment identified only 2.5 ha (3.2%) of the Site as high-class soil, comprising limited areas of LUC 2w3 and LUC 3e1. This includes the extensive areas of LUC 2w2, 3w1 and 3w2 soils, which are characterised by poor drainage, seasonal/prolonged wetness, high water tables, and surface ponding. Similarly, areas classified as LUC 3e3, 4e2 and 6e2 are constrained by rolling to steep topography and erosion risk. The predominance of these wetness and erosion limitations is recognised in both the LUC classification and the underlying soil characteristics, indicating that the productive potential of the Development Site is constrained by several permanent factors.

These limitations significantly influence the range of viable productive land uses available across the Site. The combination of poor drainage, periodic inundation, erosion susceptibility and fragmented, isolated portions of versatile land limits the suitability of the Development Site for more intensive forms of primary production, particularly cultivation-based activities. The most appropriate and sustainable use of the Development Site is pastoral farming, which aligns with the existing land capability and drainage characteristics. Opportunities for cultivation are generally restricted to the better-drained LUC 2w3 and 3e1 areas, where limited summer cropping may be undertaken. However, across the majority of the Site, pastoral grazing remains the land use most consistent with maintaining long-term productive capacity while avoiding the adverse effects associated with cultivation on wet or erosion-prone soils. This is consistent with the Google Earth aerial images (Figure 8) and drone footage (Figure 9), which shows arable cropping has been significantly impacted by wetness limitations and artificial surface drainage.

Table 3. HPL areas within the Development Site.

|                   | NZLRI Classification area (ha) | Revised Classification area (ha) |
|-------------------|--------------------------------|----------------------------------|
| HPL               | 44.4                           | 44.0                             |
| Non-HPL           | 36.5                           | 24.4                             |
| Non-Effective     |                                | 12.5                             |
| <b>Total Site</b> | <b>81.0</b>                    | <b>81.0</b>                      |



Figure 8. Google Earth imagery for the Development Site (2024)



*Figure 9. Drone footage taken on 21 May 2026 showing significant drainage and wetness limitations*

## 7.0 Assessment against the NPS-HPL

Properties that contain HPL require an assessment against the NPS-HPL. However, for completeness, productive areas located on non-HPL land (predominantly LUC 4) have also been considered. This reflects the holistic approach outlined in the NPS-HPL Guide to Implementation, which recognises that productive non-HPL land may contribute to the overall productive capacity and economic viability of a property.

In theory, the presence of LUC 2 land indicates potential for a range of agricultural and horticultural activities. However, detailed site investigations have identified significant limitations that reduce the versatility of the land resource. The Development Site is currently utilised for pastoral livestock grazing and maize and annual pasture for silage.

Wetness is the dominant limitation across much of the Development Site, with poor drainage, seasonal high-water tables, surface ponding and periodic flooding restricting land use options. While annual maize crops are currently grown, these limitations reduce the ability to reliably cultivate and harvest crops without adverse impacts on soil structure. The steeper areas are also subject to erosion limitations, making them unsuitable for cultivation, notwithstanding that small, isolated areas of productive, versatile soils are present. Consequently, the Development Site is best suited to pastoral grazing, with sustainable long-term cropping opportunities on the 2.5 ha identified as high-class soils presented in Figure 7.

While there is approximately 40 ha of arable cropping currently on the Development Site, the block is only currently in its third season, and already extensive surface drainage has had to be undertaken to lower the water table across the block. Across the northern arable area, there are 26 lateral surface drains, at an average spacing of 37 m. Considering turning circles, fertiliser spreading and ineffective headlands, there is a large portion of the 40 ha that would be unproductive.

The Manaaki Whenua – Landcare Research literature<sup>6</sup> identifies peat subsidence as a significant long-term constraint to arable cropping on drained peat soils. Cultivation and intensive cropping practices accelerate peat decomposition, resulting in ongoing soil loss and land subsidence. Reported subsidence rates of approximately 20 mm per year greatly exceed natural peat formation rates of around 1 mm per year, meaning the resource is effectively non-renewable on human timescales. As peat depth declines, soil characteristics change, drainage challenges increase, and the long-term productive capacity of the land can be reduced. Consequently, while peat soils may support arable production in the short to medium term, continued cultivation can compromise their long-term sustainability and viability for intensive cropping systems. AgFirst considers that the highest and best use of the Development Site for land-based primary production is pastoral grazing. Increasing farm operating costs are likely to constrain the long-term economic viability of primary production and increase pressure for alternative land uses over time.

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<sup>6</sup> Pronger, J. (2024). Peatland/peat soils subsidence control. In: Lohrer, D., et al.

The key limitations for land-based primary production and versatility on the Development Site are:

- Very Poorly and poorly drained soils
- Peat subsidence which will exacerbate with continued cultivation
- Vulnerability to seasonal and prolonged flooding
- Lack of cohesive, high-class, versatile soils suitable for arable cropping or intensive grazing
- Non-reversible fragmentation of surrounding properties that limit amalgamation opportunities
- Proximity to Hamilton increases property value and therefore rates and overheads
- Reverse sensitivities on numerous primary production activities due to proximity to Hamilton City

The soil types across the majority of the Development Site do not lend themselves to any long-term sustainable arable, horticultural or commercial vegetable production land uses due to the poor drainage characteristics. The very poorly and poorly draining soils will likely have impacts, with some crops not surviving, while others will have reduced yields.

## 7.1 Economic Analysis

### *Summary*

In summary, the economic viability assessment demonstrates that, despite adopting conservative assumptions and assessing the Development Site under its highest and best reasonably practicable land-based primary production use, none of the properties are capable of generating sufficient returns to support a household income, service rates and a typical level of farm debt.

This is primarily due to the combined effects of wetness limitations, reduced land use versatility, internal fragmentation caused by the surface drainage, fragmented landholdings, limited effective production area, and elevated land values influenced by the proximity of Hamilton City. Accordingly, AgFirst concludes that the Development Site is not economically viable for land-based primary production and that there are no reasonably practicable options available to overcome these constraints. Below is an economic assessment of the Development Site under a pastoral grazing system.

### *Pastoral grazing*

To assess the potential returns from pastoral livestock farming, AgFirst has utilised benchmark data from the Beef + Lamb New Zealand (B+LNZ) Sheep and Beef Farm Survey for Northern North Island Class 5 Intensive Finishing farms<sup>7</sup>. The B+LNZ data

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<sup>7</sup> [northern-north-island-class-5-finishing.xlsx](#)

indicates an average farm size of approximately 300 ha over the five-year period from 2020/21 to 2024/25.

AgFirst has assessed the total area within the Development Site that is considered suitable for pastoral grazing, being approximately 68.4 ha. Given the significantly smaller scale of the Development Site relative to the benchmark farming operation, it is unlikely that the Site could achieve the same level of per ha profitability due to reduced economies of scale and a diminished ability to spread fixed and operational costs across the farming business. Accordingly, the B+LNZ benchmark has been adopted as a conservative assessment, assuming that all effective pastoral areas within the Development Site could be operated as a single farming unit.

The five-year average Economic Farm Surplus (EFS) for a Northern North Island Class 5 Intensive Finishing farm is \$818 per ha. This measure excludes property rates, managerial salaries, interest costs, return on capital, and any lease or rental payments. As such, it represents the operational surplus available prior to accounting for the key holding and financing costs that complete the economic viability assessment. The benchmark data used in the analysis is presented in Table 4.

Table 4. Five-year average Beef finishing Economic Farm Surplus

| <b>Beef + Lamb New Zealand Economic Service</b>             |                                                                                            |                |                |                |                        |                |
|-------------------------------------------------------------|--------------------------------------------------------------------------------------------|----------------|----------------|----------------|------------------------|----------------|
| <b>Sheep and Beef Farm Survey - \$ Per Hectare Analysis</b> |                                                                                            |                |                |                |                        |                |
| <b>Class 5 N.I. Finishing - Northland-Waikato-BoP</b>       |                                                                                            |                |                |                |                        |                |
|                                                             | 2019-20                                                                                    | 2020-21        | 2021-22        | 2022-23        | Provisional<br>2023-24 | 5 yr average   |
| <b>Revenue Per Hectare</b>                                  |                                                                                            |                |                |                |                        |                |
| Wool                                                        | 12.3                                                                                       | 9.22           | 18.24          | 15.62          | 24.84                  | 16.04          |
| Sheep                                                       | 258.35                                                                                     | 213.49         | 364.17         | 421.2          | 404.4                  | 332.32         |
| Cattle                                                      | 1346.73                                                                                    | 1164.28        | 1326.02        | 1133.2         | 952.52                 | 1184.55        |
| Dairy Grazing                                               | 84.62                                                                                      | 116.41         | 118.13         | 117.52         | 150.63                 | 117.46         |
| Deer + Velvet                                               | -0.82                                                                                      | -0.18          | 0.12           | -0.05          |                        | -0.23          |
| Goat + Fibre                                                |                                                                                            |                |                |                |                        |                |
| Cash Crop                                                   | 420.11                                                                                     | 419.45         | 395.12         | 260.59         | 346.54                 | 368.36         |
| Other                                                       | 58.63                                                                                      | 101.61         | 53.46          | 95.92          | 71.07                  | 76.14          |
| <b>Total Gross Revenue</b>                                  | <b>2179.93</b>                                                                             | <b>2024.29</b> | <b>2275.26</b> | <b>2044</b>    | <b>1950</b>            | <b>2094.70</b> |
| <b>Expenditure Per Hectare</b>                              |                                                                                            |                |                |                |                        |                |
| Wages                                                       | 129.33                                                                                     | 154.35         | 163.91         | 174.04         | 182.39                 | 160.80         |
| Animal Health                                               | 53.41                                                                                      | 59.95          | 71.38          | 61.68          | 68.03                  | 62.89          |
| Weed & Pest Control                                         | 18.67                                                                                      | 16.7           | 29.71          | 26.26          | 24.21                  | 23.11          |
| Shearing Expenses                                           | 14.48                                                                                      | 16.85          | 17.93          | 28.03          | 34.55                  | 22.37          |
| Fertiliser                                                  | 255.35                                                                                     | 238.41         | 296.08         | 316.67         | 354.4                  | 292.18         |
| Lime                                                        | 19                                                                                         | 21.91          | 20.77          | 12.72          | 23.9                   | 19.66          |
| Seeds                                                       | 56.24                                                                                      | 88.42          | 63.66          | 50.36          | 50.94                  | 61.92          |
| Vehicle Expenses                                            | 52.72                                                                                      | 51.66          | 58.79          | 53.52          | 54.4                   | 54.22          |
| Fuel                                                        | 39.32                                                                                      | 43.27          | 55.43          | 58.65          | 59.12                  | 51.16          |
| Electricity                                                 | 11.7                                                                                       | 13.91          | 13.83          | 11.61          | 11.95                  | 12.60          |
| Feed & Grazing                                              | 110.46                                                                                     | 106.8          | 118.67         | 72.84          | 62.89                  | 94.33          |
| Dog expenses                                                | 9.36                                                                                       | 12.45          | 11.01          | 9.25           |                        | 10.52          |
| Irrigation Charges                                          |                                                                                            |                |                |                |                        |                |
| Cultivation & Sowing                                        | 33.57                                                                                      | 34.54          | 28.78          | 23.94          | 24.53                  | 29.07          |
| Cash Crop Expenses                                          | 35.93                                                                                      | 50.38          | 30.96          | 15.55          | 16.35                  | 29.83          |
| Repairs & Maintenance                                       | 109.4                                                                                      | 146.91         | 145.02         | 119.46         | 119.5                  | 128.06         |
| Cartage                                                     | 31.19                                                                                      | 41.18          | 42.66          | 46.34          | 47.17                  | 41.71          |
| Administration Expenses                                     | 36.65                                                                                      | 46.61          | 51.06          | 45.56          | 45.6                   | 45.10          |
| <b>Total Working Expenses</b>                               | <b>1016.8</b>                                                                              | <b>1144.3</b>  | <b>1219.65</b> | <b>1126.47</b> | <b>1179.94</b>         | <b>1137.43</b> |
| Insurance                                                   | 23.49                                                                                      | 25.18          | 27.46          | 27.01          | 28.62                  | 26.35          |
| ACC Levies                                                  | 5.78                                                                                       | 15.98          | 10.62          | 8.84           | 9.43                   | 10.13          |
| Rates                                                       | Rates with adjustment based on tax accounting methodology (rates - house & curtilage area) |                |                |                |                        |                |
| Managerial Salaries                                         |                                                                                            |                |                |                |                        |                |
| Interest                                                    | Included at a property level economic analysis                                             |                |                |                |                        |                |
| Rent                                                        |                                                                                            |                |                |                |                        |                |
| <b>Total Standing Charges</b>                               | <b>29.27</b>                                                                               | <b>41.16</b>   | <b>38.08</b>   | <b>35.85</b>   | <b>38.05</b>           | <b>36.48</b>   |
| <b>Total Cash Expenditure</b>                               | <b>1046.07</b>                                                                             | <b>1185.46</b> | <b>1257.73</b> | <b>1162.32</b> | <b>1217.99</b>         | <b>1173.91</b> |
| Depreciation                                                | 103.18                                                                                     | 119.46         | 98.59          | 100.57         | 94.34                  | 103.23         |
| <b>Total Farm Expenditure</b>                               | <b>1149.25</b>                                                                             | <b>1304.92</b> | <b>1356.32</b> | <b>1262.89</b> | <b>1312.33</b>         | <b>1277.14</b> |
| <b>Economic Farm Surplus</b>                                | <b>1030.68</b>                                                                             | <b>719.37</b>  | <b>918.94</b>  | <b>781.11</b>  | <b>637.67</b>          | <b>817.55</b>  |

## *Development costs for pastoral grazing*

The property is currently utilised for livestock grazing and the harvesting of maize and grass silage. Much of the flatter land is not currently subdivided for grazing, while the rolling hill country is fenced into grazing paddocks. However, a number of wetlands and drainage features are present throughout the site, and these areas would require stock exclusion in accordance with the National Environmental Standards for Freshwater (NES-F).

While water is available across parts of the property, further investment in reticulated water infrastructure, including troughs and water lines, would be required to optimise grazing management and facilitate an efficient rotational grazing system. Additional internal fencing would also be necessary to improve pasture utilisation and stock management.

Furthermore, the approximately 40 ha of flat land is highly fragmented by numerous drains and waterways, reducing operational efficiency and increasing development costs. Any intensification of grazing would likely require multiple culvert crossings, additional fencing, and stock exclusion measures. Given the site is predominantly classified as low-slope land, more stringent stock exclusion requirements apply under the NES-F, further increasing the cost and complexity of development.

To get the property to a standard capable of running livestock, the following improvements will be necessary:

- Upgrade to the boundary fencing as well as internal fences to enable rotational grazing
- Fence off extensive wetlands and artificial drains
- Reticulated water system across the predominance of the Development Site
- Investigate the need and options for stock yards and load-out race
- Investigate culvert crossings for improved internal access
- Investigate planting waterways for enhancement and nutrient uptake to improve water quality
- Purchase necessary machinery and infrastructure for supplementary feed

The budget assumes the required investment has been undertaken to install necessary fencing and stock water reticulation. These costs have been incorporated into the economic viability analysis, with a view that capital investments needed to be accounted for in the budget.

To enable pastoral grazing land use, there would need to be a significant uplift in capital investment (as discussed above). The larger items would be approximately \$50,000, plus likely additional costs associated with internal access, which are detailed below. The cost to develop and establish the block to enable the productivity gains would not be a fair and reasonable expectation for an average efficient operator.

The Development Site contains an extensive network of drains, waterways, and wetland features that would require stock exclusion fencing before an efficient grazing system could be established. It is estimated that at least 7.4 km of internal fencing would be required, although the actual length may be considerably greater depending on final paddock layout and stock management requirements.

The National Stock Exclusion Study undertaken by the Ministry for Primary Industries identified fencing and stock water reticulation as the principal costs associated with stock exclusion. The study also notes that costs associated with drains, wetlands, stock crossings, culverts, and other access infrastructure were not included within the national assessment. Consequently, the actual cost of developing a compliant grazing system on a highly fragmented site such as the Development Site is likely to be materially greater than fencing costs alone.

The requirement for extensive internal fencing, stock water infrastructure, and associated farm development works represents a significant capital investment and constraint to further pastoral development of the site.

The estimated cost to install a stock water drinking system would include:

- 7.4 km fencing × \$4.67m = \$34,558
- Culverts with 8–15 crossings
- Water reticulation and troughs to 50 ha block = \$13,574<sup>8</sup>

## 7.2 Economic Viability

The productive return has been assessed at a property level. This assessment is based on the quality and capability of the soils and land resources, the effective area available for production, and the suitability of reasonably practicable land uses. In determining the most appropriate productive system, consideration has been given to the physical limitations identified across the Development Site, including wetness, erosion risk, topography and fragmentation, which collectively influence the range of viable land use options.

An optimum productive land use has been identified for each property, together with the effective area available for that use. Where multiple land classes, soil types or slope classes occur within a property, a combination of land uses has been considered where appropriate. However, given the predominance of wetness and erosion limitations across much of the Site, pastoral grazing has generally been identified as the most appropriate and sustainable land use, with cropping opportunities largely limited to the well-drained and flat/rolling areas. The effective area associated with each land use has been multiplied by the relevant gross margin or EFS to provide a pro-rated estimate of productive income for each property.

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<sup>8</sup> [National Stock Exclusion Study: Analysis of the costs and benefits of excluding stock from New Zealand waterways](#)

For conservatism, areas of non-HPL land, lower capability land and areas associated with rural-residential activities have been assigned a pastoral grazing EFS of \$818/ha, which has been derived from five years of benchmarking information derived from Beef + Lamb New Zealand<sup>9</sup>.

Property information was obtained from the Waikato Regional Council<sup>10</sup> and Waikato District Council<sup>11</sup> and is presented in Table 5 below. Rates have been apportioned to the area available for land-based primary production, excluding dwellings and associated curtilage. This approach is consistent with standard methodologies used for assessing the productive component of rating costs. The apportioned rates have then been deducted from the estimated operational surplus to provide an indicative net productive return for each property.

The definition and methodology to determine economic viability were presented at the New Zealand Agricultural and Resource Economics Society Conference in 2024<sup>12</sup> and published in the New Zealand Institute of Rural Professionals (NZIRP) journal. The term “economically viable” is used to describe a project that provides an overall positive net economic contribution to society after all costs and benefits have been accounted for. When researching commercial viability, the Cambridge Dictionary defines it as *“the ability of a business, product, or service to compete effectively and to make a profit.”* Compete effectively and make a profit identifies the need to cover real-world and genuine costs. Only then can it be determined if an operation is economically viable. This is different to having a positive gross margin, EFS of EBITRm.

To be economically viable, AgFirst suggests that the income from the farm needs to be sufficient to cover:

- i. Operating costs, e.g. wages, animal health, fertiliser, repairs and maintenance, etc.
- ii. Fixed costs such as rates, insurance, and administration.
- iii. Depreciation cost
- iv. A surplus then available that is sufficient for:
  - a) Debt servicing and debt repayment or an appropriate return on the capital investment if there is little or no debt, or the lease cost if the property is not owned by the operator;
  - b) Ongoing maintenance and development of the farm and the business.

**Land value is not zero.** Essentially, the farming business needs to produce a return on investment and/or adequate debt servicing, or the cost of leasing the property. At least one of these will be an essential requirement of any economically viable enterprise. A

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<sup>9</sup> [northern-north-island-class-5-finishing.xlsx](#)

<sup>10</sup> <https://waikatomaps.waikatoregion.govt.nz/Viewer/?map=55b8257996464fda923a6fa3c8a9115e>

<sup>11</sup> <https://www.waikatodistrict.govt.nz/services-facilities/rates/rates-information-database/property/1006063>

<sup>12</sup> [Journeaux - Definition of Farm Economic Viability.pdf](#)

viable farming operation in the real world must be one that an objectively reasonable person would choose to undertake.

To remove subjectiveness, for this assessment, AgFirst has used (i) to (iv) (a) above, adopting a debt servicing allowance, to understand the economic return and viability from the land-based primary production for the various properties and the overall viability for the Development Site.

In assessing the debt servicing required, the land value has been used rather than the improvement and capital value, to understand the profitability required for an agricultural business to service the relevant level of debt. For this assessment, the debt loadings have been assessed at 30%, which is a typical level of farm lending for drystock. Interest rates have been assumed as a long-term average of 7%<sup>13</sup>. Note that principal repayments have not been included in the liabilities. This financial analysis, including individual property rates and land valuations are presented in the Economic Viability Table below.

In their current state, the majority of the properties comprise vacant rural land utilised for pastoral grazing and some maize production, with few containing residential dwellings. Each property is assigned a land valuation by the local authority for rating purposes. These valuations are generally derived from available property information, market evidence and spatial datasets, rather than detailed site-specific inspections. In determining land values, consideration is given to a range of factors, including:

- Property type
- Location
- Land size and topography
- Zoning regulations
- Parcel area
- Consented work (renovations, new build, subdivisions, etc.)
- Data from comparable sales in the area

It also estimates the Land Value (RV), which is the most likely selling price of the land if it were vacant (had no buildings, etc. on it).

These valuations are not representative of a hypothetical or potential future value, but rather an estimate of the current market value of the land as assessed by the local authority. As such, the use of council land valuations as a proxy for debt loading or return on investment is considered to reflect existing market conditions and does not, in AgFirst's opinion, contravene Clause 3.10(3)(a) of the NPS-HPL.

Property rates are intrinsically linked to these land valuations and represent a genuine and unavoidable cost incurred by landowners, regardless of whether the land is utilised for primary production. These costs are not materially reduced due to the productive use of the land and therefore form part of the economic reality faced by landowners.

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<sup>13</sup> Exchange rates and Wholesale interest rates - Reserve Bank of New Zealand - Te Pūtea Matua (rbnz.govt.nz) 1993-2023 years with a 2.2% bank margin applied to the 90 bank bill monthly average yield

AgFirst considers that the use of council land valuations and associated rating costs provides a realistic and robust basis for assessing the economic viability of land-based primary production under current conditions.

A comparison was undertaken with a dairy farm located approximately 1.5 km west of the Development Site. This property comprises approximately 151 ha, is operated as a dairy farm, and is held across four titles, although it is valued by the local authority as a single farming unit. The property has a land value of approximately \$5.8 million, equating to \$38,410/ha.

In comparison, the Development Site comprises two separate rating units with a combined land value of \$8.95 million, equating to approximately \$110,616/ha. This figure is based on the total title area and does not account for the reduced effective area available for land-based primary production. Furthermore, it does not reflect the substantial capital investment typically associated with dairy farming infrastructure, including races, water supply systems, fencing, yards and milking facilities, which are present on the dairy farm but absent from the Development Site.

From a productive capacity perspective, the dairy farm is predominantly flat, well-developed and comprises largely LUC Class 2 and 3 land, enabling a wider range of productive land uses and generally higher levels of productivity. In contrast, approximately 45% of the Development Site is classified as LUC 4 under the NZLRI, with additional limitations associated with wetness, flooding, erosion risk and fragmented landholdings. These characteristics substantially constrain productive capacity and land use versatility.

The significantly higher land values attributed to the Development Site are therefore unlikely to reflect its productive capacity. Rather, they are considered to be strongly influenced by the site's proximity to Hamilton City and the associated expectation of future urban expansion and development opportunities. This indicates that the underlying land values have become detached from the productive earning potential of the land resource.

As demonstrated in Table 5, the productive returns generated from the highest and best reasonably practicable land uses are insufficient to service typical debt levels and property-related liabilities. All properties assessed return a negative economic position once debt servicing and rates are considered. This suggests that none of the properties would represent an attractive investment for a purchaser seeking to acquire the land solely for the purpose of land-based primary production.

Table 5. Pastoral grazing Economic Farm Surplus

| Title Number           | Land Value<br>per ha | Parcel<br>Area | Total<br>Rates   | Rates<br>per ha | Debt<br>Servicing | Liabilities<br>per ha | Effective Area<br>of Production |                    | Economic<br>Farm Surplus | Economic<br>Viability |
|------------------------|----------------------|----------------|------------------|-----------------|-------------------|-----------------------|---------------------------------|--------------------|--------------------------|-----------------------|
|                        | \$/ha                | (ha)           | Total \$         | \$/ha           | Total \$          | \$/ha                 | Beef                            | Non-<br>Productive | Total \$                 | Total \$              |
| SA6D/233,<br>SA910/139 | \$ 132,361           | 18.51          | \$ 10,221        | \$ 552          | \$ 64,470         | \$ 4,035              | 16.1                            | 2.4                | \$ 13,121                | -\$ 61,570            |
| 341666                 | \$ 104,167           | 62.40          | \$ 21,207        | \$ 340          | \$ 137,340        | \$ 2,541              | 52.3                            | 10.1               | \$ 42,701                | -\$ 115,846           |
| <b>TOTAL</b>           | <b>\$ 118,774</b>    | <b>80.91</b>   | <b>\$ 31,428</b> | <b>\$ 388</b>   | <b>\$ 201,810</b> | <b>\$ 2,883</b>       | <b>68.41</b>                    | <b>12.50</b>       | <b>\$ 55,823</b>         | <b>-\$ 177,416</b>    |

As the economic analysis shows, the total income generated from land-based primary production for the combined Development Site is \$55,823. This reduces to \$24,394 following payment of the Council Rates. This total property income is not adequate to service either of the additional requirements below

- Debt servicing and debt repayment or an appropriate return on the capital investment if there is little or no debt, or the lease cost if the property is not owned by the operator;
- Ongoing maintenance and development of the farm and the business.

When using a typical debt servicing proxy, the deficit for the Development Site is - \$177,416.

Accordingly, AgFirst considers that there are no reasonably practicable land-based primary production options capable of overcoming the economic viability constraints affecting the Development Site. The analysis indicates that the properties are not economically viable in either their current state or under their highest and best productive use. This conclusion is reinforced by the physical limitations of the land resource, the limited effective production area available, and the elevated land values driven by urban influences rather than agricultural productivity. The assessment of reasonably practicable options to overcome these constraints is discussed further in Section 7.6.

## 7.3 Permanent or Long-Term Constraints

The Development Site is extensively bordered to the east and north by medium-density residential development, resulting in a substantial increase in the number of sensitive receptors adjacent to the land. The proximity of residential dwellings, public open spaces such as Te Kootii Park, and associated recreational users creates additional operational constraints for land-based primary production. Activities commonly associated with productive rural land use, including cultivation, grazing, fertiliser application, agrichemical use, vehicle movements, dust generation and noise, are likely to be subject to increased scrutiny and potential reverse sensitivity effects.

There are limited physical buffers between the Development Site and the surrounding residential development. While isolated shelterbelts and amenity planting provide some screening, large areas of the Site remain exposed to neighbouring properties and public viewing areas. The elevated position of surrounding residential areas and

parkland further increases visibility across the Site, reducing the ability to undertake productive farming activities without potential effects on neighbouring amenity values. These constraints are inherent to the location of the Site and are likely to become more pronounced as urban development continues to intensify around the area. Figure 10 shows the proximity of the Development Site the urban areas.



*Figure 10. Encroachment on urban areas on Development Site and artificial drainage on flat wet soils*

In addition to these external constraints, the Development Site is subject to significant physical limitations that restrict its productive potential. As discussed in Section 6.4 and 6.5, wetness, flooding, erosion risk and soil limitations substantially reduce land use versatility and productive capacity. These characteristics are inherent to the land resource and cannot be materially overcome through management interventions alone. While considerable investment has been made historically to improve drainage and productivity, evidence from the site assessment demonstrates that wetness remains a dominant limitation across much of the Site, particularly in those areas mapped as HPL.

The economic viability assessment presented in Section 7.2 demonstrates that land values and associated rating obligations have exceeded the productive earning capacity of the land under its highest and best reasonably practicable land use. While amalgamation with adjoining properties could theoretically improve operational efficiency, this is not considered a realistic solution. The surrounding landholdings are generally fragmented, relatively small in size, and subject to similarly elevated land values. Although amalgamation with larger farming operations to the west is possible in theory, the economic returns associated with the Development Site would not benefit the neighbouring property and would unlikely be considered in the future. There is also separation distance and limited strategic benefit reduce the practicality of this option.

Similarly, dairy support or intensive winter grazing operations are not considered reasonably practicable alternatives. The predominance of wet soils and associated drainage limitations restricts stock carrying capacity, increases pugging risk, and reduces the reliability of cropping and supplementary feed production. The rationale for a beef-based system is having the flexibility to sell and buy cattle to match the seasonal pasture growth trends, this flexibility does not exist to the same extent in dairy support

systems. Dairy farming would also not be a reasonably practicable option, due to land use change restrictions within the Waikato Region for Proposed Plan Change 1. This places restrictions on intensifying anything greater than 4.1 ha from non-dairy into dairy.

Consequently, these options would not materially improve the economic performance of the land or overcome the long-term constraints affecting the Development Site.

AgFirst considers that the constraints affecting the Development Site are permanent or long-term in nature and cannot reasonably be overcome. The combination of physical land limitations, elevated land values and rates, surrounding residential development and reverse sensitivity effects, together with fragmented land ownership, significantly restricts the productive potential and economic viability of the Site. Accordingly, there are no reasonably practicable options available that would materially overcome these constraints.

## 7.4 Avoidance of Significant Loss, Fragmentation and Reverse Sensitivity

Based on the NZLRI mapping, the Development Site comprises LUC units 2w2, 2s5 and 4e2. LUC units 2w2 and 2s5 account for approximately 55% of the Site and are classified as HPL. The remaining 45% of the Site comprises LUC 4e2 land, which is not classified as HPL. While the NZLRI mapping identifies approximately 44.0 ha of HPL within the Development Site, detailed site investigations undertaken by Landsystems identified significant wetness, drainage and fragmentation constraints that reduce the versatility and productive capacity of the land resource.

Although approximately 44 ha of the Development Site is mapped as HPL under the interim provisions of the NPS-HPL, the productive capacity associated with this land is substantially less than would ordinarily be expected of highly productive land. Detailed site investigations identified extensive wetness limitations, peat soils, flooding susceptibility, erosion constraints and internal fragmentation that significantly reduce the versatility and productive potential of the land. Furthermore, only 2.5 ha of the Development Site meets the Waikato District Plan definition of high-class soil. Consequently, while the mapped extent of HPL is relatively large, the effective productive capacity of that land is materially constrained.

The Development Site is fragmented across multiple titles. While portions of the Site are currently used for pastoral grazing and limited maize production, the detailed land resource assessment concluded that pastoral grazing represents the most appropriate long-term sustainable land use across the majority of the Site due to the extensive wetness limitations and restricted cultivation opportunities. As demonstrated throughout this assessment, the Development Site as a whole or individually is not economically viable for land-based primary production when assessed under its highest and best reasonably practicable productive use.

Productive capacity is defined as the ability of land to support land-based primary production over the long term. The combination of physical limitations, fragmentation (both cadastral and internally), reverse sensitivity effects, urban encroachment and economic constraints significantly reduces the ability of the land to function as a productive and versatile land resource. The Development Site is located immediately adjacent to Hamilton City and is bound to the north and east by extensive rural-residential development, resulting in a highly fragmented pattern of land use that is fundamentally different from the large geographically cohesive areas of productive land that the NPS-HPL seeks to protect.

Enabling urban development of the Site would result in the loss of mapped HPL; however, the productive capacity associated with that land is already substantially constrained. Consequently, the proposal would not result in a significant loss of productive capacity either individually or cumulatively.

The area of HPL affected represents a very small proportion of the approximately 152,344 ha<sup>14</sup> of HPL identified within the Waikato District (Figure 11). More importantly, the land is already subject to permanent and long-term constraints that substantially limit its productive capacity and economic viability. Consequently, the Development Site does not make a meaningful contribution to the long-term productive capacity of the district, and its development would not materially affect the availability of productive land resources within the wider Waikato region.

Furthermore, the NZLRI mapping is a regional-scale assessment and does not fully reflect the physical limitations identified through the detailed Landsystems Site specific investigation.

No sensitive activities are proposed that would materially affect existing effect-generating activities. While the proposal would remove an area mapped as HPL, the significance of that is reduced by the constrained nature of the land resource, the existing pattern of rural-residential development, and the proximity of Hamilton City. The Site is already influenced by neighbouring sensitive receptors, which would limit the range of productive land uses that can reasonably occur. Accordingly, the proposal is not expected to result in a significant loss of productive capacity, either individually or cumulatively, nor materially increase reverse sensitivity effects on surrounding land-based primary production activities.

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<sup>14</sup> Manaaki Whenua – Landcare Research. Our Environment, LUC map.

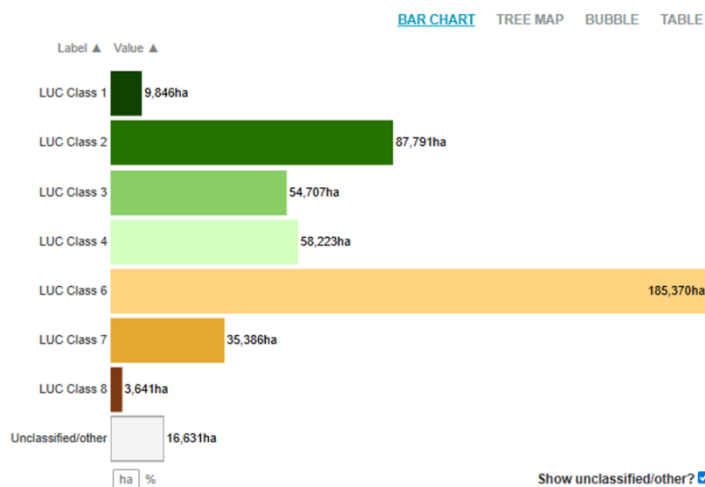


Figure 11. Summary of Land Use Classification within the Waikato District

## 7.5 Net Benefits from Urban Development Proposed on the Site

Clause 3.10(1)(c) requires consideration of whether the environmental, social, cultural and economic benefits of the proposed development outweigh the long-term environmental, social, cultural and economic costs associated with the loss of HPL for land-based primary production, taking into account both tangible and intangible values.

The broader environmental, social, cultural and economic effects of the proposal are addressed in the supporting technical assessments accompanying the application. The following assessment considers these matters insofar as they are relevant to the loss of the productive land resource and the requirements of Clause 3.10(1)(c).

A separate economic assessment has been prepared by Market Economics Limited (M.E) to support the proposed development. The M.E assessment considers the wider economic effects and benefits of the proposal, including housing supply and choice, housing affordability, employment and economic activity, together with the economic opportunity cost associated with the permanent loss of rural production from the Development Site. In considering the latter, M.E draws on the agricultural productivity and economic viability findings of this AgFirst assessment. The findings of the M.E assessment are relied upon below where relevant to the wider social and economic effects of the proposal.

### *Environmental*

As the productive capacity is severely constrained across the Site, with large amounts of fragmentation, wetness and soil limitations preventing higher productive land uses, the net change will be minimal.

However, the nutrient losses to ground and surface waters should slightly improve following the proposed development. Arable crops have higher fertiliser requirements, with proportionally higher nitrogen leaching. A large spike of nitrogen is often leached at cultivation, due to the timing of heavy fertiliser applications and the mineralisation of soil nitrogen when the soil is aerated (without a cover crop being established to uptake the nutrients). There is also increased risk of sediment and phosphate losses when the soils are cultivated, particularly on sloping land. For the pastoral grazing areas, as there is no fallow soil, and fertiliser is applied in smaller quantities as required, the nitrogen losses are less significant. The low intensity of these grazing operations would be expected to be low impacting.

Manaaki Whenua – Landcare Research<sup>15</sup> identifies peat subsidence as a significant long-term consequence of drainage and cultivation of peat soils. Continued drainage and cultivation exposes the organic peat material to aerobic conditions, accelerating peat decomposition and the oxidation of stored soil carbon. This results in ongoing greenhouse gas emissions, principally as carbon dioxide, together with progressive land subsidence and loss of the peat soil resource. Continued agricultural use of these areas therefore contributes to both greenhouse gas emissions and the ongoing reduction in the long-term productive capacity of the peat soils.

With the retirement of the Subject Site from agricultural land use, together with the retention and enhancement of existing wetlands, ecological restoration initiatives, stormwater management measures, sediment detention and contaminant management, there is potential to reduce some of the environmental effects associated with the existing agricultural land use. Collectively, these measures are expected to provide improved water quality, biodiversity and flood attenuation outcomes relative to the existing land use.

## Social

In contrast to the current land use, which is limited to pastoral grazing and cropping activities supporting relatively little direct employment, the proposed development will provide a substantial increase in housing supply and housing choice within the Hamilton and lower Waikato housing market.

The M.E assessment considers the contribution of the proposal to housing supply, housing choice and affordability having regard to projected population growth, housing demand and available development capacity within the wider market. M.E identifies approximately 380 dwellings as net additional housing supply in the medium term, increasing to approximately 1,043 dwellings once the development is fully constructed. This represents a material contribution in the context of the housing capacity shortfalls identified by M.E for the wider housing market.

The proposal will also establish a comprehensively planned residential community incorporating a range of housing typologies, open spaces, ecological restoration,

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<sup>15</sup> Pronger, J. (2024). Peatland/peat soils subsidence control. In: Lohrer, D., et al.

neighbourhood services and supporting infrastructure. These features will provide benefits extending beyond the existing agricultural use of the Development Site and contribute to housing choice and the wider community needs of the Hamilton urban area.

M.E also identifies employment and economic activity associated with construction of the development and the ongoing operation of the proposed neighbourhood centre. These matters are discussed further under the economic assessment below.

## *Cultural*

No known sites of cultural significance have been identified within the Development Site and, therefore, direct adverse effects on cultural heritage values are expected to be limited. While this is not a direct cultural benefit, the proposal incorporates the retention of natural wetlands, riparian revegetation, open space networks and improved stormwater management, which have the potential to enhance freshwater and ecological values within the wider catchment.

These outcomes may provide indirect benefits to tangata whenua through the protection and enhancement of environmental values associated with waterways and mahinga kai resources. In addition, the proposal has been designed as a master-planned community that provides housing, recreation opportunities, ecological restoration and supporting infrastructure, contributing to the social and cultural wellbeing of future residents and the wider community.

## *Economic*

The M.E assessment identifies a range of economic benefits associated with the proposed development, including increased housing supply and choice, improved housing affordability, construction and ongoing economic activity, increased competition within the residential land market, and support for surrounding commercial centres.

M.E estimates that approximately \$552 million of construction expenditure will occur over the anticipated development period. This expenditure is estimated to support approximately \$278 million in value added, discounted at 8%, together with substantial employment over the construction programme. M.E appropriately notes that these figures represent gross economic activity associated with the development rather than net additional national economic benefits.

Of particular relevance to this assessment, M.E has also considered the economic opportunity cost associated with the permanent loss of rural production from the Development Site. Based on the AgFirst assessment, the Site is estimated to generate an agricultural operating surplus of approximately \$55,800 per annum. M.E estimates the present value of this forgone production at approximately \$628,000 to 2055, using an 8% discount rate, or approximately \$698,000 where the annual operating surplus is assumed to continue in perpetuity.

M.E notes that these values are likely to overstate the economic loss because development will occur progressively rather than removing the entire Site from agricultural production immediately. More importantly, the operating surplus does not represent the overall economic viability of the landholding. As demonstrated in Section 7.2 of this Report, once rates and debt servicing are taken into account, continued agricultural use results in an estimated annual deficit of approximately \$177,416. M.E therefore concludes that urbanisation of the Development Site is unlikely to result in an economic loss of commercially sustainable rural productive potential.

Accordingly, while development will result in the permanent loss of agricultural production from the Site, the economic opportunity cost of that loss is relatively limited when considered against the wider economic benefits identified by M.E.

### *Will the benefits outweigh the costs?*

Overall, AgFirst considers that the benefits associated with the proposed urban development outweigh the long-term costs associated with the loss of productive capacity from the Development Site.

The proposal will result in the permanent loss of approximately 44.4 ha of mapped HPL. However, as demonstrated throughout this assessment, the significance of that loss is reduced by the substantial physical, economic and locational constraints affecting the Site, including wetness limitations, reduced land use versatility, fragmentation, reverse sensitivity effects and the demonstrated inability of the land resource to support economically viable land-based primary production.

The M.E assessment provides further context to the economic significance of this loss. The present value of the forgone agricultural operating surplus is estimated at approximately \$628,000 to 2055 at an 8% discount rate, with M.E noting that this is likely to overstate the actual opportunity cost given the staged nature of development. This is also considered in the context of AgFirst's finding that the underlying agricultural land use is not economically viable once property-level ownership and financing costs are taken into account.

Against this relatively limited productive opportunity cost, M.E identifies substantial benefits associated with additional housing supply and choice, housing affordability, construction and ongoing economic activity, increased competition within the residential land market and support for surrounding commercial centres. The proposal will also provide the environmental and social benefits identified above, including ecological restoration, improved stormwater management, public open space and supporting infrastructure.

Accordingly, having regard to the limited productive capacity and economic viability of the land resource, together with the wider benefits identified by M.E and the other technical assessments supporting the application, AgFirst considers that the environmental, social, cultural and economic benefits of the proposed development

outweigh the long-term costs associated with the loss of HPL for land-based primary production.

## 7.6 Reasonably Practicable Options to Overcome Constraints and Economic Viability

AgFirst has assessed all reasonably practicable options to demonstrate that the permanent or long-term constraints on economic viability cannot be addressed to retain productive capacity, as required under Clause 3.10(2).

### 7.6.1 *Alternative options to retain productive capacity*

This assessment includes addressing alternative forms of land-based primary production to overcome the permanent long-term constraints on economic viability. These alternative options include:

- Arable
- Dairy farming or dairy support
- CVP
- Horticulture

Landsystems has LUC mapped the Development Site, this highly detailed report assists in understanding the physical limitations for land-based primary production. The highest and best land use assesses reasonably practicable options for alternative production systems and suitability of these operations based on physical characteristics of the land and requirements of the various productive systems. To overcome some of the fragmentation constraints due to property boundaries and small scale, AgFirst has reviewed whether amalgamation and boundary adjustments would overcome the constraints. The following section discusses the alternative forms of land-based primary production and whether they will overcome the constraints. The economic viability of these optimised land uses for each of the individual properties are presented in Table 5.

Despite the alternative land-based primary production systems, these optimised productive systems do not overcome the constraints on economic viability of the Development Site, with all of the individual properties showing a loss in profitability when looking at the economic viability test discussed in Section 7.2.

### *Arable*

Approximately 40 ha of the Development Site is currently used for maize production and annual grass silage. While maize cropping has historically been undertaken on these areas, the predominance of poorly and very poorly drained soils presents significant constraints to the long-term suitability of this land use. As discussed in this report, sustainable and productive arable cropping systems generally require favourable physical characteristics, including flat to gently undulating topography and imperfectly to well-drained soils.

The dominant limitation across the HPL within the Development Site is wetness. Elevated seasonal water tables, restricted drainage, and prolonged periods of soil saturation create challenges for crop establishment, growth, and harvesting. These limitations result in narrow cultivation and harvest windows, increased susceptibility to soil compaction from machinery traffic, restricted access during wet periods, and an increased risk of reduced crop yields. Consequently, the long-term viability of continuous or intensive arable production is constrained.

The site is further affected by an extensive network of drains and waterways that fragment the arable land into smaller management units. This fragmentation reduces operational efficiency, limits the use of large-scale machinery, and further constrains the feasibility of intensive cropping systems.

The drainage network also introduces regulatory and environmental constraints. Regulatory restrictions for arable crops as per Schedule C – minimum farming standards for Proposed Waikato Regional Plan Change 1 (PC1) require a 5-metre cultivation setback from any waterway. For arable farms (or combined use) that are greater than 20 ha, these will require a freshwater farm plan. This also reduces the effective productive area available for cropping. These setback areas can also create challenges for weed management and increase ongoing maintenance requirements.

In addition, arable cropping in close proximity to residential areas can create secondary effects, including the attraction of rodents and other pest species. Following harvest, these populations may disperse into surrounding areas in search of alternative food sources. Given the proximity of the Development Site to existing urban and residential development associated with Hamilton City, this represents an additional land use constraint that may become increasingly relevant as urban expansion continues.

While approximately 40 ha of the Development Site is currently utilised for maize production, this land use is dependent on extensive artificial drainage and is constrained by seasonal wetness, restricted cultivation windows, flooding risk and ongoing peat subsidence. These factors significantly reduce the long-term sustainability and versatility of arable production across the Site.

From an agricultural perspective, land-based primary production on the Development Site is constrained by a combination of long-term and permanent factors, including:

#### ○ Soil constraints

- » Poorly and very poorly drained soils across the Site. While these soils are still likely to be considered HPL, the significant wetness limitations will impact the versatility and productive capacity of these areas.
- » The remaining land within the Development Site is constrained by erosion and wetness limitations
- » Lack of contiguous high-class soils suited to continuous cropping and intensive land uses

## ○ Environmental constraints

- » Cultivation setbacks from waterways further reduce productive areas within the site
- » Stock exclusion from waterways
- » Long-term soil degradation and associated impacts to water quality

## *Dairy farming or dairy support*

Dairy farming or dairy support is not a reasonably practicable option due to:

The predominant wetness and drainage limitations across the Site make it generally unsuitable for intensive pastoral systems such as dairy farming. While some limitations could be partially mitigated through significant investment in off-paddock infrastructure, the costs associated with such improvements are unlikely to be economically justified.

- There are no adjoining dairy or dairy support operations that would enable practical amalgamation, with the nearest dairy farm located approximately 1.5 km west of the Development Site along Whatawhata Road.
- Waikato Regional Council Proposed Plan Change 1 (PC1) regulations – It would be impractical to consider dairy farming for the Development Site, as it would trigger the land use change within PC1. Resource consent would require a proposed dairy farm to reduce their diffuse discharges below the baseline. Set out in Policy 2 (c) of the PC1 relating to this land use change “Generally not granting land use consent applications for changes in land use that involve a material increase in the intensity of the use of land compared to the land uses as at 22 October 2016, unless it can be demonstrated that this would result in a positive contribution to the health and wellbeing of the Waikato and Waipā river catchments in accordance with Policy 5”. Policy 5 refers to the overall reduction in diffuse discharges.
- The average size of a dairy farm in South Waikato is 150 ha, according to Dairy NZ Statistics 2024/25 <sup>16</sup>. To achieve any viable scale, this would require amalgamation between multiple land holdings, further reducing practicality. None of the adjoining properties are in dairy farm use, therefore amalgamation with an existing dairy farm would not be an option.
- Significant investment will be required to build dairy infrastructure to meet regulatory and supply company requirements.
- Fragmented land across multiple properties will prevent any viable scale from being achieved.
- Risk for off-site odour effects due to proximity to multiple dwellings, sensitive receptors and Hamilton City, particularly for dairy effluent blocks, effluent storage ponds, cowshed infrastructure and spray irrigation within the paddocks.
- The high value of the land makes it unattractive for leasing or purchasing, with farmers opting to purchase dairy farms that have better drainage properties,

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<sup>16</sup> [nz-dairy-statistics-24-25.pdf](#)

existing dairy farms that are more distant from urban areas and at affordable land values.

- The boundary to Hamilton City further discourages the establishment of dairy farming activities on the Development Site.
- Conversions of non-dairy land into dairy are sought on lower-value land to account for the capital investment required.

## *Commercial Vegetable Production*

There are currently no properties within the Development Site that are in commercial vegetable production (CVP) use. As discussed in Section 6.4 and 6.5, the soil types across the majority of the Development Site do not lend themselves to any CVP land uses. AgFirst does not consider that CVP is a reasonably practicable option for the Development Site.

CVP is not a reasonably practicable land use option for the Development Site due to:

- Under the PC1 rules, the expansion of any CVP in this region will require a consent. Consent will only be granted if the land for which consent is sought must be located entirely within the designated sub-catchments and on LUC 1 and/or LUC 2 land. The Development Site is located in the Waipa Freshwater Management Unit, within Sub-Catchment 26 –Ohote. Rule 3.11.4.8, Table 1, does not identify Sub-Catchment 26. Therefore, expansion of CVP on the Development Site is a non-complying activity under the PC1 requirements.
- Hamilton clay loams and peat soils are not recognised commercial vegetable growing soils within the Waikato region.
- Land with very poorly and poorly drained soils and erosion susceptibility on sloping land will limit both yield and suitability.
- Lack of contiguous areas of suitable land, poorly drained flats although not suitable for intensive cropping, are further compromised by extensive drainage networks that reduce the effective areas within the site.
- Rules requiring all commercial vegetable activities to get consent<sup>17</sup>.
- The proximity to neighbouring receptors and Hamilton City would be an elevated risk of causing off-site nuisance dust, noise and spray drift effects.
- None of the properties would be sought after for established CVP operations, due to the land not being suitable.
- There are no other nearby CVP operations that the Development Site could provide expansion opportunities for.

## *Horticulture*

AgFirst does not consider high-value horticulture as a reasonably practicable option to overcome the economic and land constraints within the Development Site due to:

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<sup>17</sup> [22.09.23\\_Website-Summary.https://www.hortnz.co.nz/assets/Environment/RegionalUpdates/04-Waikato/22.09.23\\_Website-Summary.pdfpdf](https://www.hortnz.co.nz/assets/Environment/RegionalUpdates/04-Waikato/22.09.23_Website-Summary.pdfpdf)

- The LUC on the Development Site does not have horticulture as a potential sustainable land use. Kiwifruit needs well-drained, aerated soils. Cold, windy and wet sites are particularly susceptible to PSA disease<sup>18</sup>.
- Horticulture requires well-drained soils with deep rooting depth, whereas the Development Site has poorly drained anaerobic soils and shallow rooting due to poor soil drainage and high-water table.

The development costs involved for establishing a horticulture operation, such as kiwifruit, are estimated as \$150,000 - \$400,000 per ha<sup>19</sup> (including irrigation, plants, frost protection, trellis infrastructure and shelter) in addition to license fees. Other horticulture options, such as pip fruit, are not suitable for the soil and topography limitations on the Development Site<sup>20</sup>. It would be impractical to make this level of investment in the small areas that are in proximity to sensitive receptors.

With horticulture operations, there are issues with sprays and noise from frost protection. This location, next to Hamilton City and surrounding lifestyle blocks, has too many sensitive receptors that would restrict the operation or risk-averse off-site effects.

Alternative greenfield developments with better soils, less fragmentation and significantly lower costs are more suitable for conversion into horticulture.

## 7.6.2 Improved land management strategies

AgFirst does not consider improved land management strategies a practicable option to overcome the economic and versatility constraints within the Development Site due to:

- The constraints of irreversible land fragmentation and small scale cannot be overcome by land management strategies.
- The Development Site is internally fragmented by an extensive surface drainage network, with little formed access to areas, which requires additional development (culverts and bridges) and also further constrains potential land uses on large geographically cohesive landforms.
- Artificial sub-surface drainage has been considered as a means of improving land versatility. However, AgFirst does not consider subsurface drainage to be a practical or effective option, given the limited slope variation across the properties. Achieving the required drainage gradient of 0.5% to 1.0% would require a fall of 0.5 to 1.0 m over every 100 m. Given the relatively high-water table during winter and drainage events, it would be difficult to ensure that drainage coils at the outflow remain above the water level in adjacent drains, streams, or waterways. Accordingly, subsurface drainage is unlikely to be effective.

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<sup>18</sup> [Commercial kiwifruit growing NZ: statistics and guidance](#)

<sup>19</sup> [kiwifruitFactsheet \(1\).pdf](#)

<sup>20</sup> [Commercial apple and pear \(pipfruit\) growing NZ: statistics and guidance](#)

- Due to the very poorly drained soils, artificial drainage will have to be designed with tight spacing and laterals to remove water from the root zone. This becomes very costly considering the land use options available.
- There are further issues with the development of open surface drains. Good farming practices and some regulations include and recommend cultivation setbacks. Examples of this are 5 m setbacks within the Waikato Regional Proposed Plan Change 1 minimum standards. This would remove additional productive land.

The highest and best production use across the Development Site has been evaluated. While small improvements would be feasible, there are no alternative options that would be significant enough to lift profitability to an economic level.

### *7.6.3 Alternative production strategies*

The constraints of soils, irreversible land fragmentation and small scale cannot be overcome by alternative production strategies. There are also no feasible or suitable options for alternative production strategies.

The highest and best production use across the Development Site has been evaluated. There are no proven alternative cropping options or strategies that would be significant enough to lift profitability to an economic level.

### *7.6.4 Water efficiency or storage methods*

While water efficiency or storage methods is a requirement for horticulture and CVP, conversion to these land uses are not suitable, therefore not a relevant solution. Pastoral grazing does not require freshwater irrigation.

A feasibility study for water availability has not been undertaken. Water is required for stock drinking, however, this is already assumed to be available due to the current land use of grazing beef cattle. Additional, access to water for stock drinking in a permitted activity under the Waikato Regional Council.

### *7.6.5 Boundary adjustments (including amalgamation)*

This assessment has reviewed the contiguous HPL areas within and surrounding the Development Site, which are suitable for primary production.

The Development Site is constrained in terms of amalgamation opportunities to the north and east due to existing urban development. While opportunities for amalgamation may exist to the west and south of State Highway 23, these properties are also characterised by elevated land values that are disproportionate to their productive earning potential. This is particularly relevant given the limited infrastructure associated with higher-value productive land uses and the physical limitations that constrain the Development Site's productive capacity. S-Map shows that the soils on

the sites shown in Table 6 below are largely comparable to those of the Development Site.

Table 6: Land Values Surrounding the Development Site

| Title area (ha)             | Land Value | Land Value/ha |
|-----------------------------|------------|---------------|
| 25.3                        | 3,200,000  | \$ 126,482.21 |
| 25.6                        | 2,930,000  | \$ 114,453.13 |
| 73.1                        | 7,550,000  | \$ 103,283.17 |
| 44.65                       | 3,410,000  | \$ 76,371.78  |
| 7.1                         | 1,390,000  | \$ 195,774.65 |
| Average/ha<br>\$ 123,272.99 |            |               |

Table 6 shows the land values of several adjoining land parcels, notably the 73.1 ha title that appears to be a retired dairy farm to the west of the 18.1 ha title within the Development Site. Noting that the 73.1 ha property has better access tracks, water, ancillary sheds and layout. These properties are disproportionately higher than the dairy farm 1.5 km west of the Development Site that is valued at \$38,334/ha. Market research conducted by Colliers show the average price of a Dairy Farm in Waikato of \$39,310/ha<sup>21</sup>.

The size and shape of land parcels do not facilitate the efficient use of the land in a conjoined contiguous area. The majority of the titles are irregularly shaped, meaning additional fencing and tracking requirements.

Potential amalgamation properties adjoining the Development Site are characterised by similar pastoral land uses, poorly drained soils, and limited infrastructure. Despite this, land values remain disproportionately high relative to productive earning capacity. This demonstrates that one of the constraints is a disconnect between land values and productive returns. Accordingly, increasing the scale of a pastoral farming system would not materially improve economic viability, nor could the constraint be reasonably overcome through improved management practices or alternative land-based primary production uses.

### 7.6.6 Lease arrangements

With regard to leasing opportunities, the economic viability assessment demonstrates that the areas available for land-based primary production are unable to generate sufficient returns to provide a viable lease arrangement. Based on current and reasonably foreseeable productive returns, the available land would generate a net loss once rates and other fixed costs are considered. As a result, leasing does not overcome the permanent or long-term constraints affecting the Development Site.

<sup>21</sup> [Colliers | New Zealand Dairy Property Market Report 2025 | Colliers Rural Valuation](#)

From a lessee's perspective, there is insufficient productive income available to support a commercial lease payment while maintaining a reasonable return from farming operations. Conversely, a lease rate that reflects the productive capability of the land would be insufficient to cover the landowners' fixed holding costs, including rates. Accordingly, leasing is not considered a reasonably practicable option to overcome the economic viability constraints affecting the Development Site.

### 7.6.7 Summary

AgFirst has assessed all reasonably practicable options available to overcome the permanent and long-term constraints affecting the Development Site, including alternative land-based primary production systems, improved land management strategies, alternative production methods, water storage and efficiency measures, boundary adjustments and amalgamation, and lease arrangements. The assessment concludes that none of these options are capable of materially improving the economic viability of the Development Site or overcoming the identified constraints.

The Development Site is constrained by a combination of poor drainage, wetness limitations, land fragmentation, reverse sensitivity effects, elevated land values and rates, and proximity to Hamilton City. While minor productivity gains may be achievable through management interventions, there are no reasonably practicable options that would enable the Site to achieve a level of profitability sufficient to overcome these constraints. Accordingly, AgFirst considers that the constraints affecting the Development Site are permanent or long-term in nature and that the Site cannot sustainably support a more intensive or economically viable form of land-based primary production.

## 7.7 Evaluation of Reasonably Practical Options

Pursuant to Clause 3.10(3)(a), AgFirst has assessed a range of reasonably practicable options to overcome the permanent and long-term constraints affecting the Development Site. These options included alternative forms of land-based primary production, improved land management practices, alternative production systems, water management measures, boundary adjustments and amalgamations, and lease arrangements. Consistent with Clause 3.10(3)(a), these options have been assessed independently of any economic benefit that may arise from using the land for purposes other than land-based primary production.

In considering whether an option is reasonably practicable, AgFirst has applied a real-world assessment of what a farming business would reasonably have to undertake. The assessment demonstrates that none of the identified options are capable of overcoming the physical and economic constraints affecting the Development Site. While amalgamation could theoretically increase the landholding area, the Site would remain constrained by wetness limitations, reduced land use versatility, reverse sensitivity effects, fragmented ownership patterns, elevated land values and proximity to Hamilton City. Furthermore, the economic viability assessment demonstrates that neither the individual properties nor the Site as a whole can sustain economically viable

land-based primary production, even when assessed under their highest and best productive use. Accordingly, AgFirst concludes that there are no reasonably practicable options available to overcome the identified constraints.

Pursuant to Clause 3.10(3)(b), AgFirst has considered the impact that the loss of HPL would have on the landholding in which the HPL occurs. The assessment concludes that the primary constraints affecting the Development Site are long-term and irreversible, including wetness and drainage limitations, fragmented ownership, urban encroachment, reverse sensitivity effects and economic viability. While the proposal will result in the loss and fragmentation of approximately 44.4 ha of mapped HPL under NZLRI, the significance of this loss is reduced by the constrained nature of the land resource and its limited productive capacity. The Site is already unable to sustain economically viable land-based primary production, and the proposed development will not materially affect the productive capacity of any remaining HPL areas.

With respect to Clause 3.10(3)(c), AgFirst has considered the future productive potential of the Development Site without being limited by its current or historical use. The assessment concludes that the highest and best reasonably practicable land-based primary production use of the Site is pastoral grazing, with limited opportunities for cropping on the better-drained areas. However, even under this scenario, the Site remains constrained by wetness, drainage limitations, reduced land use versatility, fragmented landholdings and elevated holding costs. There are no additional reasonably practicable land management strategies capable of materially improving productive capacity or economic viability. Accordingly, AgFirst concludes that the Development Site is subject to permanent and long-term constraints that cannot reasonably be overcome.

## 8.0 Summary

Land-based primary production across the Development Site is currently limited to low-intensity pastoral grazing and small areas of annual maize production. Having regard to the physical characteristics of the land, soil limitations and economic viability, AgFirst considers that pastoral grazing represents the highest and best reasonably practicable land-based primary production use of the Site.

Overall, while a reasonable proportion of the Development Site is classified as HPL under the NPS-HPL, the ability of the land to support economically viable and versatile land-based primary production is substantially constrained by a combination of permanent and long-term factors, including:

- Non-reversible land fragmentation of the Development Site and surrounding land uses
  - Adjacent to Hamilton City and sensitive receptors
  - Fragmentation throughout the Development Site is compounded by internal fragmentation through extensive drainage networks
  - Lanes, roads and existing development
- Soil conditions
  - Large area of very poorly drained soils that limit the productive capacity and versatility
  - Sloping areas greater than 15 degrees are unsuitable for arable, while slopes greater than 10 degrees are unsuitable for CVP or horticulture
  - Drains, wetlands and non-productive areas
- Lack of expansion or alternative forms of land-based primary production options
  - No opportunity for improved or alternative land management and production strategies
  - Multiple land parcels
  - Physical boundaries and amalgamation opportunities
- Contractors and lease agreements
  - Low appeal for these restricted land holdings due to disruptions and complaints, and proximity to sensitive receptors

Given the constraints identified above, AgFirst believes that the proposed urban use of the Development Site meets the NPS-HPL exemption tests in Clause 3.10 and therefore can be subdivided, used or developed for urban activities and does not need to be preserved for productive purposes.

In particular:

- Based on the assessment of the Development 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 able to be economically viable for at least 30 years.
- Removing the Development Site from productive use will cause no significant loss in the district or 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 of the Development Site, the urban use of the Development Site will not cause significant 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 physical limitations of the Development Site, together with increasing input costs and elevated land values, the economic returns available from land-based primary production are expected to continue to decline relative to holding and operating costs. While some properties may have limited opportunities to increase productive output, these opportunities do not materially overcome the identified constraints or improve economic viability.

AgFirst concludes that the Development Site will not be economically viable for land-based primary production over the next 30 years. Furthermore, there are no reasonably practicable options, including alternative land uses, land management strategies, boundary adjustments or amalgamations, that would materially improve the productive capacity or economic performance of the Site.

From a productive land-use perspective, the Development Site is poorly suited to continued economically viable land-based primary production. Given its proximity to Hamilton City, the existing pattern of surrounding urban development, and the significant physical and economic constraints affecting the land resource, the Development Site represents a comparatively constrained productive land resource. This conclusion is consistent with the M.E assessment, which identifies substantial wider economic benefits associated with the proposed urban development relative to the economic opportunity cost associated with the loss of rural production.

## Appendix A: Qualifications and Experience

### Jeremy Hunt

- Director | Agribusiness & Environmental Consultant
- BSc (Environmental Science)
- Member – New Zealand Institute of Rural Professionals (NZIRP)

#### Professional Profile

Jeremy Hunt is a Director and Agribusiness and Environmental Consultant with AgFirst Waikato, specialising in rural land resource assessment, agricultural productivity, farm systems and agricultural economic analysis.

Jeremy regularly undertakes assessments of the productive capacity and economic viability of rural land to support resource consent, subdivision and land use change applications. This includes assessments under the NPS-HPL, where he evaluates soil and land capability, property scale and configuration, topography, drainage, surrounding land use and other factors to identify permanent or long-term constraints affecting land-based primary production.

Drawing on his agricultural and farm systems expertise, Jeremy identifies production systems that are realistically suited to the land resource and practicable within its physical and operational constraints. He then applies an economic lens to assess the performance of those systems and determine whether the land is capable of supporting an economically viable primary production enterprise.

Jeremy has experience across pastoral, dairy and dairy support, arable and forage cropping, and horticultural systems. He also undertakes soil and land resource assessments, including interpretation of NZLRI LUC mapping, S-Map soil information and site-specific land resource information, supported by GIS and spatial analysis.

Jeremy has extensive experience providing technical advice and evidence through statutory planning processes, including numerous Council hearings and Environment Court proceedings. More recently, he has prepared a range of technical assessments for substantive applications under the Fast-track Approvals Act, including assessments of productive land resources, agricultural productivity and economic viability.

His broader work includes farm system analysis, nutrient management, farm environment planning, wastewater and effluent management, and technical assessments supporting resource consent and planning processes.

Prior to joining AgFirst in 2018, Jeremy worked for NIWA and subsequently in environmental consulting and project management roles with URS and AECOM. He also spent two years operating a System 3–4 dairy farm as a contract milker, providing practical experience in the operation and management of a commercial farming enterprise. Jeremy became a Director of AgFirst Waikato in 2020.

**Areas of Expertise**

- NPS-HPL productive capacity and economic viability assessments
- Rural productivity and land use assessments
- Agricultural and horticultural enterprise economic analysis
- Farm systems analysis
- Land Use Capability and soil resource assessments
- Assessment of constraints affecting land-based primary production
- GIS and spatial land resource analysis
- Resource consent and AEE technical support
- Technical evidence, Council hearings, Environment Court and Fast-track processes

**Qualifications**

- Bachelor of Environmental Science – University of Canterbury
- Advanced Certificate in Sustainable Nutrient Management – Massey University
- Advanced Soil Conservation Course – Massey University
- Land Use Capability Certification – Simon Stokes Consulting
- NZ Certificate in Agriculture (Dairy Farming), Level 4 – DairyNZ
- Project Management Certification – AECOM
- Certified Dairy Effluent Warrant of Fitness Assessor – DairyNZ

## Branden Darlow

- Agribusiness & Environmental Consultant
- B. Ag Bus
- Member – New Zealand Institute of Rural Professionals (NZIRP)

### Professional Profile

Branden is an Agribusiness and Environmental Consultant with AgFirst Taranaki, working across land resource assessment, farm systems, environmental planning and rural land use.

A key part of Branden's work involves understanding the productive potential and limitations of rural land. He undertakes Land Use Capability (LUC) and soil assessments for resource consent, subdivision and land use projects, including assessments under the National Policy Statement for Highly Productive Land (NPS-HPL). His approach combines available land resource information with site-specific assessment of soils, topography, drainage, property configuration, existing land use and other factors influencing the practical use of land for primary production.

Branden has a strong background in farm-scale LUC and soil mapping, developed through his previous role as a Soil Conservator with Taranaki Regional Council. He is proficient in spatial analysis using ArcGIS Pro and uses GIS extensively to interpret and present LUC, soils, topography, LiDAR and other spatial land resource information.

Alongside his land resource work, Branden provides farm systems analysis and management advisory services across dairy and pastoral farming. He is accredited in Farmax Dairy and Farmax Red Meat modelling and uses these tools alongside practical farm knowledge to assess feed supply and demand, stocking policies, productivity and the implications of changes to farm systems.

His wider consulting work includes farm environment planning, nutrient and effluent management, land use assessments, resource consent applications and technical support for planning and consenting processes.

Before joining AgFirst Taranaki in 2024, Branden worked as a Soil Conservator at Taranaki Regional Council, undertaking detailed soil and LUC mapping and preparing comprehensive farm plans. Prior to this, he operated a dairy farming business in Taranaki. This practical farming background provides a strong foundation for assessing land and farm systems in the context of how they can realistically be managed and operated.

Branden was named the 2020 Taranaki Dairy Manager of the Year in the New Zealand Dairy Industry Awards.

**Areas of Expertise**

- Land Use Capability and soil resource assessment
- Farm-scale LUC and soil mapping
- NPS-HPL productive capacity and land use assessments
- Rural land use and productivity assessment
- ArcGIS Pro and spatial land resource analysis
- Dairy and pastoral farm system analysis
- Farmax Dairy and Red Meat modelling
- Farm environment planning
- Nutrient and effluent management
- Resource consent and AEE technical support
- Farm management advisory

**Qualifications**

- Bachelor of Agribusiness (International Business) – Massey University
- Land Use Capability Certification – Simon Stokes Consulting
- Certificate in Livestock Feeding
- Farmax Dairy Accredited
- Farmax Red Meat Accredited

## 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



**AgFirst Waikato (2016) Ltd**

1 Melody Lane, Ruakura, Hamilton 3216 | PO Box 9466, Hamilton 3240, New Zealand  
+64 7 839 2683 | [waikato@agfirst.co.nz](mailto:waikato@agfirst.co.nz) | [www.agfirst.co.nz](http://www.agfirst.co.nz)

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