

Addendum Memorandum

To: Sunfield Developments Ltd

Date: 22 January 2026

From: Jeremy Hunt – AgFirst Agribusiness Consultant

Subject: Implications of the 2025 amendments to the National Policy Statement for Highly Productive Land on the Sunfield Development Site

Purpose of this Addendum

This addendum memorandum has been prepared to supplement the original NPS-HPL assessment for Sunfield Developments Limited (AgFirst, September 2025).

Its purpose is to:

- Address the implications of the 2025 amendments to the National Policy Statement for Highly Productive Land (NPS-HPL) which came into effect on 15 January 2026; and
- Clarify how those amendments affect:
 - The identification of Highly Productive Land (HPL);
 - The assessment of fragmentation; and
 - Whether the Sunfield Development Site (Development Site) contains any large and geographically cohesive areas of HPL.
- This memorandum does not replace the original assessment. Rather, it confirms and strengthens its conclusions in light of the amended policy framework.

Relevant Amendments to the NPS-HPL

The NPS-HPL Amendment 2025 introduces several changes that are directly relevant to this Development Site.

Of particular relevance are:

- The amended definition of LUC 1, 2, or 3 land, which now limits reliance on:
 - “any more detailed mapping in place at the commencement date (17 October 2022) that uses the Land Use Capability classification”; and
 - Amendments to clause 3.5(7), which refine the circumstances in which land is treated as HPL during the transitional period, including the introduction of clause 3.5(7)(b)(iii) relating to subdivision, use or development on LUC 3 land subject to resource consent applications.

These amendments materially affect how land fragmentation and cohesion must be assessed.



Applicable Land Use Capability Mapping

The amended definition of LUC 1, 2, or 3 land clearly enables the use of more detailed Land Use Capability mapping which existed at the commencement date.

In this case:

- Site-specific LUC mapping undertaken by Dr Peter Singleton in December 2020:
 - Uses the New Zealand Land Use Capability Classification system; and
 - Was completed prior to the commencement date of 17 October 2022.
- Accordingly, this mapping qualifies as “more detailed mapping in place at the commencement date” for the purposes of the NPS-HPL.
- When the Singleton 2020 mapping is applied:
 - The Development Site does not comprise a single, contiguous LUC 3 land unit as shown by the NZLRI;
 - Instead, the land comprises a mosaic of:
 - LUC 2 and LUC 3 land;
 - LUC 4+ land;
 - Non-effective land; and
 - Modified or anthropic areas.
- This materially reduces the extent of land mapped as HPL for the purposes of the NPS-HPL.

Application of Clause 3.5(7)(b)(iii)

Clause 3.5(7)(b)(iii) provides that, during the transitional period, land is not treated as highly productive land where it is:

“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.”

This provision has the following implications for the Development Site:

- It applies only to land that is lawfully classified as LUC 3;
- It operates as an exclusion from HPL, not as an expansion of HPL; and
- It further refines the amount of land treated as HPL prior to regional mapping being operative.

Applying the Singleton 2020 mapping, only limited areas of the Development Site are classified as LUC 3. To the extent that any of those areas are subject to a resource consent application for subdivision, use or development (other than rural lifestyle) lodged at or after the commencement date, those areas are expressly excluded from being treated as HPL under clause 3.5(7).

This provision further confirms that the overall extent of land treated as HPL on the Development Site is severely reduced.

Fragmentation and Geographic Cohesion

- Clause 3.10 of the NPS-HPL requires territorial authorities to avoid the fragmentation of large and geographically cohesive areas of highly productive land.
- Following the 2025 amendments, this assessment must be undertaken using:
 - Lawfully applicable LUC mapping in place at the commencement date; and

- The spatial configuration of HPL that remains after application of clause 3.5(7), including clause 3.5(7)(b)(iii).
- When assessed on this basis, fragmentation is an existing characteristic of the Development Site, not an effect arising from the proposal.
- Using the pre-commencement mapping, the remaining HPL on the Site:
 - Occurs in small, discrete polygons;
 - Is separated by:
 - Non-HPL land;
 - Existing dwellings and curtilage;
 - Roads, accessways, and infrastructure;
 - The NZTA Notice of Requirement for Mill Road Stage 2; and
 - Ardmore Airport and other non-rural land uses.
- No remaining HPL area is large in scale, contiguous with other productive land, or capable of functioning as part of a wider productive system.
- Accordingly, the Development Site does not contain any large or geographically cohesive areas of highly productive land as contemplated by clause 3.10(b)(ii).
- The amendments reinforce that the NPS-HPL is directed at protecting functionally coherent productive land, rather than theoretical designations derived from coarse-scale mapping.
- The remaining HPL fragments on the Development Site are:
 - Physically isolated;
 - Operationally constrained; and
 - Surrounded by incompatible land uses.
- Protecting these isolated remnants would not advance the purpose or intent of the NPS-HPL.

Implications for Clause 3.10 Assessment

- The proposal does not fragment a large or geographically cohesive area of HPL, because no such area exists on the Development Site once the amended policy framework is applied.
- Fragmentation is a historical and irreversible condition arising from subdivision patterns, infrastructure provision, zoning, and surrounding development.
- Given the limited extent, isolation, and lack of cohesion of remaining HPL:
 - The Development Site does not make a meaningful contribution to district-wide productive capacity; and
 - Its loss would not result in a significant individual or cumulative reduction in HPL.

Confirmation of Original Conclusions

The 2025 NPS-HPL amendments, including clause 3.5(7)(b)(iii):

- Do not undermine the original AgFirst assessment in any way; and
- Reinforce the conclusions regarding:
 - Fragmentation
 - Soil versatility;
 - Lack of geographic cohesion;

The economic assessment considered the entire productive areas of the Development Site, as a holistic approach, using what AgFirst believes to be the highest and best and most productive land uses. These land uses are based on the physical characteristics and constraints that exist, which will not change due to the 2025 NPS-HPL amendments.

Conclusion

When applying the amended NPS-HPL framework and lawfully applicable pre-commencement LUC mapping, the following outcomes occur:

- The remaining HPL on the Development Site is limited, fragmented, and isolated;
- No large or geographically cohesive areas of HPL exist;
- Clause 3.5(7)(b)(iii) further reduces the land treated as HPL; and
- The proposed development will not fragment highly productive land contrary to the NPS-HPL.

The findings and conclusions of the original AgFirst assessment therefore remain robust and are strengthened by the 2025 amendments to the NPS-HPL.