BEFORE THE SELWYN DISTRICT COUNCIL

UNDER the Resource Management Act 1991

AND

IN THE MATTER of Plan Change 68 by Urban Holdings Limited, Suburban Estates Limited, And Cairnbrae Developments Limited (Applicants)

STATEMENT OF EVIDENCE OF VICTOR MKURUTSI MTHAMO ON BEHALF OF URBAN HOLDINGS LIMITED, SUBURBAN ESTATES LIMITED, AND CAIRNBRAE DEVELOPMENTS LIMITED

VERSATILE SOILS

Dated: 6 March 2022

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INTRODUCTION:

1 My full name is Victor Mkurutsi Mthamo.

2 The following is a summary of my evidence.

SUMMARY

3 The PC68 area includes 36.13 ha of Land Use Capability (LUC) Class 2 soils and 7.57 ha of LUC Class 3 soils. The remainder contains Class 4 soils, which are not considered as being versatile.

4 A review of site-specific factors relevant to the productivity of those soils indicates that:

(a) The climate in the area causes soil moisture deficits. Water is not available for irrigation to mitigate the effects of the deficits and meet the crop demand. This severely constrains intensive crop production. The volume of water required for irrigation is 472,028 m^3. I have estimated that almost $1M is required just to buy and transfer consents to the PC68 area to irrigate for full productivity.

(b) Nutrient application rates will be limited by the nutrient limits set out in the Canterbury Land and Water Regional Plan. Reducing nutrient applications affects the crop yield potential. Therefore, the soil's productivity potential is not realised.

(c) Advances in technology and farming techniques over the years have been such that the removal of up to 43.7 ha of these soils is unlikely to result in any significant loss in production as this can be made up for elsewhere in the district, and even on soils of lower LUC classes.

(d) The developable area in the context of the total LUC 2 and LUC 3 soils in the district and the region is very small (0.031% and 0.0052% respectively).

(e) The PC68 will not result in any significant cumulative loss of versatile soils both at a district and a regional level. The change in LUC Classes 1-3 as a result of all plan changes (operative and proposed) between January 2018 and November 2020 (when PC68 was lodged) is <0.36% and <0.06% within the district and the region respectively.

(f) The site is bound by existing subdivisions and lifestyle blocks. I expect significant resultant reverse sensitivity issues associated with intensifying agricultural production in such an area.

5 The Officer's s42A report supports the inclusions of additional blocks within the plan change. This will increase the reduction in LUC Class 2 soils from 36.13. ha (without these blocks) to 48.82 ha. The cumulative reduction in LUC1-3 Class soils will increase from:

5.1 0.356% to 0.365% within the district.

5.2 0.060 % to 0.061% within the region.

6 For these reasons, it is my opinion that the effect of PC68 on district and regional agricultural productivity potential is insignificant.

Evidence of Marcus Langman

7 Mr. Langman states at his para 153 that I downplay the importance of the soil resource. I do recognise the value of productive soils as I have discussed in detail in my evidence.

7.1 The NPS-HPL recommends site specific assessment to be taken into consideration where this is possible to remove the sole reliance on the defaults LUC Classes 1-3.

7.2 Various other references (e.g. in Paragraph 29 - *Canterbury Regional Council v Selwyn District Council* [W142/96], Environment Court Judge Treadwell) in my evidence suggest the importance of site specific soil assessments.

7.3 I note that Mr Langman does not acknowledge this requirement for site specific soil assessments in his evidence or when he concludes that I have downplayed the importance of productive soils.

7.4 I also note that Mr Langman does not specifically dispute any of the site specific issues that I have assessed and their effect on the productivity potential of the land.

8 However for the range of reasons summarised above and discussed in more detail in my evidence, I do not consider the soils on the site to be capable of sustaining fully productive agricultural uses.

Victor Mthamo

18 March 2022