BEFORE AN INDEPENDENT HEARINGS COMMISSIONER AT SELWYN

IN THE MATTER OF Clause 21 of the First Schedule of

the Resource Management Act 1991

(Plan Change 75)

AND

IN THE MATTER OF YOURSECTION LIMITED

(Applicant)

SUMMARY OF EVIDENCE OF VICTOR MKURUTSI MTHAMO (VERSATILE SOILS)

Dated: 3 November 2021

SUMMARY OF EVIDENCE OF VICTOR MKURUTSI MTHAMO:

- 1 My name is Victor Mthamo. In my evidence I provided an assessment of the site soil's productive capacity and the versatility of the soils.
- The PC75 area includes 16.26 ha of Land Use Capability (*LUC*) Class 2 soils and 8.44 ha of LUC Class 3 soils.
- I have assessed the soils' productivity based on both the definitions in the Canterbury Regional Policy Statement (CRPS) and in the proposed National Policy Statement – High Productive Soils (pNPS-HPL).
- 4 Under the Canterbury Regional Policy Statement (*CRPS*) only soils in Class 1 and 2 are considered, by default, to be "versatile soils". It is noted however that soils within Class 1 Class 3 will, by default, fall within the proposed definition of "highly productive land" under the proposed National Policy Statement on Highly Productive Land (*NPS HPL*).
- The proposed NPS-HPL recognises that the LUC classification is simply a default position or a starting point for identifying the productive value in soils, given identified limitations with the LUC classification system¹ including that the classifications are based on high level soil properties to ascertain productivity potential and these do not necessarily drive land and soil quality.
- Given this, the proposed NPS-HPL leaves open the prospect that more detailed information/analysis of the soils in question or other environmental factors relating to their productivity may impact the overall assessment of their value.
- 7 I undertook a review of the site specific factors relevant to the productivity of the soils an concluded 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.
 - (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 24.7 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.

As described in the proposed NPS-HPL consultation document.

- (d) The developable area in the context of the total LUC 1 and LUC 2 soils in the district and the region is very small (0.003% and 0.018% respectively).
- (e) The PC75 will not result in any significant cumulative loss of versatile soils both 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 December 2020 (when PC75 was lodged) is <0.571%.
- (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.
- I also note that the Rolleston Structure Plan identified and evaluated the soil resource when determining the urban growth pattern for the township and the rezoning site as a future residential area. Therefore, the proposed PC75 site represents a small loss to the overall Class 2 and Class 3 versatile soil resource within the region given that this loss had already been anticipated and the related adverse effects considered through the Rolleston Structure Plan.
- 9 For these reasons, it is my opinion that the effect of PC75 on district and regional agricultural productivity potential is insignificant or less than minor.

Dated: 3 Novem	ber 2021
Victor Mthamo	