

Selwyn District Council
2 Norman Kirk Drive
Rolleston 7643

Attention: Andrew Henderson

Re: Peer Review of RC245566 Agricultural Productivity Assessment

To whom it may concern,

Rural Consulting Limited has been engaged by Selwyn District Council (SDC) to undertake a peer review of the agricultural productivity assessment included with consent application RC245566, relating to a property at 668 Robinsons Road, Rolleston. The productivity assessment was prepared to address matters raised in the National Policy Statement for Highly Productive Land (NPS-HPL) concerning the applicant's proposal. The review focuses on whether the applicant has sufficiently demonstrated that the site faces permanent or long-term constraints that make land-based primary production economically unviable for at least 30 years, thereby justifying an exemption under Clause 3.10(a) of the NPS-HPL. The peer review was undertaken by Josh Brown, Managing Director of Rural Consulting.

EVALUATION OF SITE CONSTRAINTS

The assessment provides a thorough evaluation of the site's physical and legal constraints, focusing on the soil characteristics, lack of irrigation water, and the fragmented nature of the surrounding land parcels. The soils on the site, characterised as shallow and extremely gravelly with poor moisture retention, are accurately described as significant limiting factors for both horticultural and arable uses. The report also correctly highlights the absence of existing irrigation infrastructure and the prohibitive costs of developing such systems, which would be necessary to make the land productive.

The analysis of access to irrigation water is robust, and I concur with the conclusion that the lack of viable irrigation options severely constrains the land's productivity potential. The assessment's assumption that these constraints will persist over the 30-year period is reasonable, given the current water allocation status and the financial barriers to developing new irrigation infrastructure.

In this context, the land fragmentation analysis becomes a critical aspect of assessing the site's productivity potential. The assessment accurately identifies the highly fragmented nature of the surrounding area, where land parcels are predominantly small (less than 5 hectares), providing very limited opportunities for the economies of scale needed to overcome the economic and physical challenges identified. Through a desktop GIS exercise, I confirmed that there are no larger contiguous blocks in the vicinity that might otherwise allow for more efficient land use and potentially mitigate some of the site's inherent limitations.

This fragmentation presents a substantial challenge to making the block economically viable, especially when considered alongside other constraints such as the lack of access to irrigation water, the shallow soil depth, and the stoniness of the soil. These factors collectively diminish the potential for successful consolidation of land parcels and restrict the ability to implement land-based primary production at a scale necessary for economic viability. The report's conclusion that the fragmented nature of the land significantly contributes to its unviability is well-founded and supported by the evidence.



EVALUATION OF LAND USE OPTIONS AND THEIR FINANCIAL VIABILITY

The report provides a fair analysis of various potential land use options, including dairy farming, horticulture, arable farming, and drystock grazing. Each option is evaluated in terms of its feasibility given the physical and economic constraints of the site, and the assessment concludes that none of these options would be viable in the long term.

For dairy farming, the report correctly identifies the lack of economies of scale, significant capital development requirements, and potential reverse sensitivity issues due to the proximity of residential areas as major barriers. The site's small size and the high costs associated with necessary infrastructure, such as effluent management systems, make dairy farming economically unfeasible.

In terms of horticultural land use, the report accurately points out the limitations imposed by the shallow, well-drained soils, which are prone to moisture stress, particularly during the summer months. The absence of irrigation infrastructure, high establishment costs, and the potential for reverse sensitivity issues further diminish the viability of horticulture on this site. Additionally, the site's cold winters and remoteness from processing facilities add to the logistical and financial challenges of establishing a successful horticultural operation.

Arable farming faces similar challenges, particularly the impracticality of transporting large machinery through a fragmented and developed area, as well as the inherent soil limitations that would restrict crop yields. The report's analysis of the need for arable rotations and the associated challenges in such a fragmented landscape is particularly relevant.

The report also considers drystock grazing and baleage production as possible land uses. However, it reasonably concludes that, while this may be the most suitable option among the evaluated uses, it still faces significant limitations that would make it economically unviable over a 30-year period. These include the need for substantial investment in irrigation systems, pasture establishment, and infrastructure development, all of which are unlikely to be economically justified given the site's small size and other physical constraints.

I agree with the report's conclusion that the most probable agricultural use for this property is small-scale pastoral land use, specifically livestock grazing and baleage making. However, even this option is unlikely to be economically viable without significant investment, which is not justified given the current and projected financial returns.

The comprehensive analysis provided in the report clearly demonstrates that, given the existing constraints, none of the potential land uses are viable in the long term. The report's conclusion that the land is unlikely to support economically viable primary production is well-supported by the evidence, and I agree with this assessment.

CONCLUSION

Overall, the Agricultural Productivity Assessment for 668 Robinsons Road, Rolleston, provides a well-structured and largely convincing argument that the site is subject to permanent or long-term constraints that preclude economically viable land-based primary production. In my professional opinion the assessment demonstrates that the consent application RC245566 meets the requirements of Clause 3.10(a) of the NPS-HPL.



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Rural Consulting Limited

Reported Prepared by:

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke, positioned above a dotted line.

Joshua Brown

Managing Director

