This is a template to be used by anyone interested on submitting on a proposed plan change or land use consent application that may result in the loss of high value soils. It has been prepared by the NZSSS Executive Council for all members to use. However, reference to the NZSSS can only be made with the prior approval of the NZSSS Executive Council.

Please replace all highlighted text with appropriate text relevant to the application being submitted on.

06 November 2015

Attention: To Whom it may Concern

Dear X

SUBMISSION – PROTECTION OF HIGH VALUE SOILS FROM URBAN ENCROACHMENT

**The Submitter**

The [New Zealand Society of Soil Science (“NZSSS”)] represents the professional and technical interests of professionals engaged in all aspects of the study, management and use of soils in New Zealand. [NZSSS] provides a forum for the exchange of ideas and information within the profession, and is thus normally engaged more internally in the science of the soil, rather than externally in the politics of its use.

However, an exception to its internal focus is a need to ensure that factual information in relation to our country’s soil resources is given due recognition in the context of land use planning and decision making at district, regional and national level.

**The Application**

This submission is made by [NZSSS] in respect of your Council’s proposed [*add details of application, including application number*]

This application is [*leave relevant preference -* supported/opposed/neither supported nor opposed].

We wish to be heard in respect of our submission, and we are willing to attend a pre-hearing meeting, should one be held.

**Specific Parts of Application on which Submission is Made**

The parts of the application which we support/oppose/wish to have amended are as follows:

* [detail here aspects of the….
* Application that there are issues…
* With and or need changing]

**Reasons for Making this Submission**

The soils that occupy areas of land that have high productive versatility, and that may be considered to have comparatively high value for the production of food, are a finite and diminishing resource. This fact was recognised in the former Town and Country Planning Act, which made the protection of such soils a matter of national significance. The repeal of that Act, and its replacement with the Resource Management Act in 1991, removed the national significance of the protection of such soils; it did not, however, change the fact of the value of the resource, nor of its finite and diminishing nature.

By general consensus, New Zealand’s long-term economic future will continue in large measure to rely on the production, and export, of high quality, high value food products for consumption by discerning purchasers. Such produce cannot be produced at will on just any old land; New Zealand has large areas of land that are suited only to pastoral or forestry uses at best, and only relatively limited areas of “high value soils”.

These high value soils, incorporating unique combinations of geology, landform, climate, and comparatively short histories of productive use must be regarded as the foundation of any comparative market advantage enjoyed by our country.

By comparison, urban use can safely and sustainably be established on a much wider variety of soils and sites. Provided flooding and landslide hazards are avoided as may be appropriate, a wide variety of topographies, soil types, and locations may be equally suitable for urban development.

Urban encroachment onto adjacent rural land has been seen to be an almost entirely one-way process. Once land has been used for the establishment of housing, commercial and industrial use, with the associated provision of communication and other public infrastructure, it is not cheap, not easy, and mostly not practical to reverse the process, remove the urban development, and return the land involved to its former actual or potential productive use.

Despite the absence of a national requirement to afford protection to high value soils, and also because of that absence, it is important that at district and regional levels due weight is given to sustaining the availability of such soils for the productive uses that will not be possible once the land has been subsumed into urban development.

**Decision Requested**

[NZSSS] requests that due weight be given to the need to protect and sustain the availability and versatility of the high value soils resource, by using the publicly available soils information to identify the location of such soils, and to protect the high value soil resource for continued or potential future food production by excluding such areas from proposed urban development.

Yours sincerely

**[New Zealand Society of Soil Science]**

X Y

President

**Copy to**

**» list of who this letter is copied to**