

BEFORE THE CANTERBURY REGIONAL COUNCIL

IN THE MATTER OF THE RESOURCE MANAGEMENT
ACT 1991

AND

IN THE MATTER APPLICATIONS TO TAKE AND USE
SURFACE WATER FOR THE
PURPOSE OF SPRAY IRRIGATION
ON:
HIGH COUNTRY ROSEHIP
ORCHARDS LTD, AND
ROSEHIP ORCHARDS NZ LTD.

EVIDENCE IN REPLY OF DR MICHAEL LAWRENCE STEVEN (LANDSCAPE PLANNER)

for
HIGH COUNTRY ROSEHIP ORCHARDS LTD
and
ROSEHIP ORCHARDS NEW ZEALAND LTD

INTRODUCTION

- 1 My name is Michael Lawrence Steven. I am a practicing landscape architect and landscape planner employed by Vivian and Espie Ltd, a specialist resource management and landscape planning consultancy based in Queenstown. My qualifications and experience are set out in my primary brief of evidence.
- 2 I address the evidence of:
 - 2.1 Ms Di Lucas, on behalf of Mackenzie Guardians
 - 2.2 The s42A addendum to the landscape report of Mr Glasson.
- 3 I note that the absence of comment on any part of the other parties' evidence does not equate to my agreement with such evidence.

MS DI LUCAS

- 4 At paragraph 127 of her evidence Ms Lucas states that the High Country Rosehip Orchards land that is subject to CRC071833 is "entirely uncultivated". Ms Lucas is mistaken, as the photograph reproduced at Figure 4 of the graphic appendices for High Country Rosehip Orchards NZ Ltd illustrates. As well as cultivation for arable cropping, an area of the property was developed for the purpose of a commercial rosehip orchard.
- 5 Contrary to what Ms Lucas claims at paragraph 128, most of the site is not visible from SH8. That part of the property adjacent to SH8 is not proposed for irrigation. The nearest centre pivot irrigator will be some 1.5—2 kilometers from the State Highway. All of the land proposed for irrigation is on a lower terrace than land adjacent to the State Highway, and cannot be seen from the State Highway. The Mackenzie District Council has recently approved a rural residential subdivision for this part of the property, and future development on this land will form the intervening landscape between the State Highway and irrigated land.
- 6 In forming her opinion Ms Lucas may not have relied upon up-to-date plans of the proposed High Country Rosehip Orchards irrigation layout.
- 7 At paragraph 130 Ms Lucas states:

I assess [buffering the highway and rivers] inadequate as the landscape integrity would remain adversely affected. In my opinion the application would have significant adverse effects on the natural science, legibility and aesthetic values of the Pukaki system and should be declined.

- 8 Ms Lucas has provided no evidence regarding the manner in which she undertook an assessment, and neither has she provided data and analysis that supports her conclusion that the application should be declined. Her conclusion is a personal opinion based on her particular worldview, rather than a conclusion drawn from a critical and objective assessment of effects. The concept of "landscape integrity" she refers to is an undefined and ambiguous concept with no particular relevance to the issues that I am able to deduce from her evidence.
- 9 Discussing the visibility of the Rosehip Orchards NZ property at paragraph 133, Ms Lucas claims the site is visible from SH8. This is not the case, as the Bendrose property lies between SH8 and the RONZ property. The nearest part of the Rosehip Orchards property is approximately 6.5 kilometers from State Highway 8. For all practical purposes the RONZ site is invisible from SH8.
- 10 At paragraph 134, Ms Lucas states:
- The existing irrigation within the landscape unit is a legible disruption which with expansion would threaten the integrity of the natural landscape values. The application would be appropriately declined.
- 11 As with her evidence on the HCRO property, Ms Lucas offers no evidence on the assessment techniques, data or analysis she uses to reach her conclusion. Reference to the "*integrity of natural landscape values*" amounts to no more than cant. Her recommendation that the application be declined is unsupported by any rigorous or objective assessment.

MR CHRIS GLASSON

- 12 Discussing the landscape elements associated with High Country Rosehip Orchards at paragraph 52 of the addendum to his landscape report, Mr Glasson states that all irrigation will be on the higher terrace. This is incorrect. All irrigation is to be on the lower terrace, as shown on the maps that accompany my evidence-in-chief.
- 13 I note that with regard to Rosehip Orchards NZ CRC072118 & CRC021749, and High Country Rose Hip Orchards CRC072233, Mr Glasson is satisfied that the landscape and visual effects of these applications will be acceptable.

Michael L Steven
Landscape Planner
22 April 2010

