

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:
SIMONS HILL AND SIMONS PASS
STATIONS

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

for

SIMONS HILL STATION LTD and SIMONS PASS STATION 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 Anne Steven, on behalf of Mackenzie Guardians,
 - 2.2 Ms Di Lucas, on behalf of Mackenzie Guardians.
- 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 ANNE STEVEN

- 4 At paragraph 110 Ms Steven explains that she accords high significance ratings to landscapes where she considers opportunities exist to restore or increase the natural character of "*recognised iconic high country landscapes*". If naturalness is understood as the degree of human modification or intervention in natural elements, patterns and processes (as explained in my general brief of evidence) then Ms Steven appears to be advocating for high country farmers to desist from legitimate farming activities in the interests of re-creating a romanticised notion of how she considers the high country landscape should be.
- 5 At paragraph 36, Ms Steven states:

The overall effect will be a substantially more domesticated farm landscape with an agribusiness flavour because of its scale, orderliness and degree of mechanisation. It would express a fundamental shift from the traditional extensive pastoral system based on extensive grazing of low productivity unirrigated grasslands that has characterised the Mackenzie Basin since European settlement.
- 6 Underlying this statement (and generally within Ms Steven's evidence) is the opinion that Mackenzie Basin farmers have an obligation to farm their properties according to farming systems that maintain or restore the land to a state that accords with a particular, romanticised visual aesthetic. While we may look back nostalgically to a time, several decades ago, when the Mackenzie Basin was farmed in what Ms Steven refers to as the "*traditional*" manner of an "*extensive pastoral system based on extensive grazing of low productivity unirrigated*

grasslands”, farming systems in the Mackenzie Basin must respond to economic, technological, social and environmental factors, as they do elsewhere in rural New Zealand. The Mackenzie Basin cannot be maintained as a broad scale, open air museum of obsolete farming systems and practices in the interests of satisfying a particular community of interest, such as the traveling public.

- 7 The Mackenzie District Plan does not restrict farming to extensive pastoralism within Simons Pass and Simons Hill Stations. Other than on a Site of Natural Significance (where intensification is limited to 5% of the area) pastoral intensification is a permitted activity within the Rural zone of the Mackenzie District. It is noteworthy that even upon Geopreservation Sites pastoral intensification is a permitted activity with no restriction on the area where pastoralism can be intensified (Rule 15.1.1.a).

- 8 In Part B, paragraph 23 Ms Steven states her assumption that “*land that is to be irrigated will be ploughed up, cultivated and sown in pasture and crop species*”. Ms Steven then proceeds to outline a number of adverse effects that arise from the land being “*ploughed up and cultivated*”. I am informed by Mr Fastier, owner of Simons Hill Station that best practice techniques for the establishment of pasture and crops in the Mackenzie Basin apply direct drilling techniques rather than ploughing and cultivation. Ms Steven has no grounds for assuming land will be ploughed and cultivated.

- 9 At paragraph 111, Ms Steven, referring to the severely degraded grassland of the Pukaki Outwash Plain, opines; “*[i]n the absence of rabbits, wilding pines and possibly briar, and with no stock grazing, it is my understanding there is a possibility native species could return to the land, given enough time.*” Again at paragraph 121 Ms Steven refers to the potential for restoration of natural character and ecological viability. Ms Steven’s desired outcome (which she acknowledges is only a possibility, even given the requisite conditions) relies upon a combination of circumstances so unlikely as to render the proposition impracticable:
 - 9.1 Absence of rabbits
 - 9.2 Absence of wilding pines
 - 9.3 Absence of briar
 - 9.4 Retirement from pastoral farming.

- 10 Even given the unlikely absence of rabbits, wilding pines and briar, and assuming retirement from pastoral farming, Dr Espie's evidence shows that tussock grassland cannot re-establish in situations where there is competition from mouse-ear hawkweed, *Hieracium pilosella*.
- 11 Ms Steven does not suggest how the freehold landowner of the Simons Hill part of the outwash plains might achieve any or all of these pre-requisites for restoration, or indeed why he should, other than in the interests of an economically viable farming system.
- 12 At paragraph 115 Ms Steven opines; "*[a]lmost all areas proposed for application are relatively unmodified and retain an appearance and an ecology that is not dissimilar to that existing prior to European occupation*". With regard to both appearance and ecological reality, this is clearly an unsupportable proposition. I rely upon the evidence of the ecological experts, particularly Dr Espie, whose evidence on the ecological state of the vegetation communities of the Pukaki Outwash Plain I regard as more reliable than that of Ms Steven.
- 13 At paragraph 133, in discussing the issue of the landscape significance of the Pukaki outwash plain (whether or not it is justifiably an outstanding natural landscape in terms of the RMA s6(b)), Ms Steven claims there are outstanding aesthetic and biophysical (natural science) values present on both Simons Hill and Simons Pass stations. In circumstances in which the outwash plain displayed an intact, unmodified ecological system, the proposition that the outwash plain is outstanding may be justified. However, in its current severely degraded state, I do not consider the landscape of the outwash plain to pass the threshold for naturalness or significance, and cannot justifiably be regarded as ONL. It should also be recognised that Simons Hill Station has already been through the tenure review process, a consequence of which is that no land within the Pukaki Flats was assessed as being of sufficient conservation value to be returned to the conservation estate.
- 14 At paragraph 138, Ms Steven claims; "*...a large part of the proposed development does occur within moraine areas – the northernmost 7 centre pivots on Simons Pass*". The irrigation layout is schematic only, and does not necessarily represent the exact locations of pivots. While some pivots are likely to be within areas of moraine, such areas include the Farm Block. I am unaware of any biophysical attributes of the landscape within this area that would be adversely affected by irrigation, and the reporting officers for the Canterbury Regional Council have raised no objection to irrigation within the Farm Block locality. While the Geopreservation Site extends

to the Farm Block the greater part of the Farm Block is not part of the geopreservation site. As already noted, pastoral intensification is a permitted activity within Geopreservation Sites

- 15 At paragraph 146 Ms Steven claims I make a distinction between naturalness and natural character. Ms Steven has misread my evidence as I make no such distinction. I regard the two terms as being synonymous and interchangeable. What I distinguish is the basis for discriminating between degrees of naturalness, with some assessments undertaken on an objective basis, and some on a predominantly subjective basis. The latter I refer to as *apparent* naturalness, or that which seems natural. In my opinion managing landscapes according to what *seems* natural is an unsound basis for sustainable management.
- 16 At paragraph 152 Ms Steven opines that “*the cultivation of virgin land and sowing of mono-specific crops of grass and forage crops is a crossing of a threshold in my opinion. Once over there is no opportunity to restore a more natural landscape*”. There is an assumption in this statement that these landscapes can and should be restored, presumably to a pre-European state. This view is reflected in Ms Steven’s comments at paragraph 154 where she speculates on an alternative future for these lands as conservation land. This overlooks the fact that Simons Hill Station has passed through the tenure review process and those parts of the Pukaki Outwash Plain within the property, not being deemed worthy by the Department of Conservation of adding to the conservation estate, have been freeholded for the purposes of agricultural production.
- 17 At paragraph 161 Ms Steven proposes that brown and grey landscapes are important for maintaining sense of place and identity. It appears that much of the opposition to irrigation within the Mackenzie Basin is grounded in concerns for sense of place and identity. However, it is my opinion that much of this sentiment is grounded in nostalgic recollections of what the Mackenzie Basin once was, but is no longer. I consider it important also to acknowledge that the maintenance of this preferred sense of place comes at some considerable cost. In my opinion, the colonisation of the basin by wilding pines has a far greater capacity to change the basin’s sense of place, and irrigation and increased farm productivity provides farmers with the capacity to control wilding spread.
- 18 In any event, I question whether sense of place will be changed by irrigation to the point where the Mackenzie Basin has an “anywhere” characteristic, as asserted by Ms Steven. I consider landscape attributes, characteristics and qualities that are sufficiently unique to the Basin will

endure the advent of irrigation and more intensive farming and a strong sense of place will remain. The overall area proposed for irrigation represents a very small proportion of the total area of the Basin. Section 7 of the District Plan identifies the main land systems represented in the basin as having the following areas:

- System One: Unfarmed — 132,000 ha
- System Three: Semi Arid Plains and Lower Hills — 210,000 ha

- 19 At paragraph 163 Ms Steven concludes, “...‘brown’ landscapes are simply likely to hold more values for people than green ones.” The “people” Ms Steven refers to are not those whom derive their livelihood from farming the Mackenzie Basin. Ms Steven fails to acknowledge that the values held by communities in respect of the Mackenzie Basin are diverse and include the values attributable to the land for farming and economic purposes.
- 20 At paragraph 166 Ms Steven states her assumption that braided patterns in the landscape of the outwash plain will be; “*redistributed, to even out soil depth and fertility. There is certainly earthmoving machinery capable of carrying this out.*” There is no basis in the application for Ms Steven to assume broad scale earthmoving will be undertaken.
- 21 At paragraphs 168—170 Ms Steven is critical of the fact that I have not assessed views from Simons Hill, the Benmore Range, and Rhoboro Hills. In my opinion there is no justification for views from these locations requiring particular consideration and assessment. I accept that from each of these locations the visual effects of irrigation within the Mackenzie Basin generally will be visible, to a greater or lesser extent. However, visibility per se is not synonymous with the perception of adverse effects, as Ms Steven’s comments imply. Ms Steven may regard the geometric patterns perceived from these viewpoints as constituting an adverse effect, but that simply reflects her own particular world view of how agriculture should be conducted within the Mackenzie Basin.

MS DI LUCAS

- 22 At paragraphs 46—47 (which includes a paragraph numbered 39) Ms Lucas outlines her scale and factors for the assessment of naturalness. Mr Lucas’s scale relates only to grasslands as a specific vegetation community, rather than landscape generally, as is the normal practice when assessing naturalness. Ms Lucas identifies a very narrow range of factors in considering modifications to the naturalness of the grassland community, and appears to regard the

naturalness of the landscape as primarily based on the degree of pasture improvement alone. Other factors, such as the spread of wilding pine, the invasion of the grasslands by hieracium, and damage caused by rabbit infestation are ignored. Ms Lucas also accepts pastoral farming as a characteristic of the highest level of naturalness. Ungrazed grasslands, such as those within the conservation estate, are clearly representative of a higher order of naturalness than the highest level of naturalness proposed by Ms Lucas. As such, Ms Lucas's scale of naturalness cannot be relied upon.

- 23 At paragraph 59 Ms Lucas proposes the view from the air as an important consideration. Ms Lucas claims she has assessed effects on the Mackenzie Basin ONL as experienced aurally to be highly significant and adverse. Ms Lucas has provided no information on the technique she has applied to assess aerial views, nor has she discussed the nature of the data she has gathered to support her conclusion that the effects will be highly significant and adverse. At best Ms Lucas' comments can be taken to be a reflection of her personal dislike of the effects of irrigation as viewed from the air.
- 24 At paragraph 69 Ms Lucas proposes; *"...for any site for which some area is to be consented for irrigation, a Landscape Plan, prepared by a Registered NZILA Landscape Architect, together with ecologists, should be developed to be included as a condition of consent"*. While I encourage the involvement of landscape architects with appropriate experience in the preparation of farm plans, I consider the proposed condition of consent to be an unreasonable imposition on landowners and managers.
- 25 At paragraph 104, discussing Simons Pass application CRC062867, Ms Lucas misrepresents the opinions of both Ms Walker and Mr Glasson. In his s42A addendum report (paragraph 18) Mr Glasson states of Simons Pass CRC062867:
- Located on the south side of SH8, east of Simons Pass and on the immediate north side of SH8.
 - Ms Lucas believes that irrigation is inappropriate.
 - Currently the southern side has a conifer shelterbelt screening the site from SH8.
 - I believe the site is well integrated, contained and of a small scale and to be acceptable for irrigation purposes.
 - The northern side should have a buffer of at least 100m of native grassland between the road reserve and the irrigated land.

- 26 While I shall address Mr Glasson's comment regarding the need for a buffer on the north side of the highway later, there is nothing in Mr Glasson's comments to indicate he considers the proposal should be reduced, as stated by Ms Lucas.
- 27 Nowhere in Ms Walker's evidence am I able to locate where she describes the area subject to CRC062867 as being of the "greatest ecological concern", as asserted by Ms Lucas. The degree of agricultural development already evident in this location is not consistent with the site being of ecological concern.

MR GLASSON – LANDSCAPE ADDEDNDUM

- 28 At paragraph 18 of his landscape addendum Mr Glasson repeats his opinion that a buffer of at least 100 m is necessary adjacent to SH8, east of Simons Pass (see paragraph 25 above).
- 29 As Figures 5, 6(a) and 6(b) of my graphic appendices to my evidence for Simons Pass and Simons Hill show, there is an established level of agricultural development in this location that is part of the vernacular landscape. A buffer of dry grassland already exists on the north side of SH8, as is evident in Figure 6(b). I consider a roadside buffer to be unnecessary in this location. In my opinion, to take a 100m strip of land out of productive, improved farmland and return it to dry indigenous grassland would be a perverse and costly exercise from which no landscape or visual benefits would accrue.
- 30 At paragraph 21, discussing Ms Steven's evidence, Mr Glasson agrees with Ms Steven (at paragraph 173) in considering my evidence to be "academic" (and presumably on this basis, of no practical relevance to the issues being investigated). Nowhere in Ms Steven's evidence, including paragraph 173, does she make a statement in which she regards my evidence as 'academic'.

Michael L Steven
Landscape Planner
28 April 2010