

**BEFORE THE QUEENSTOWN LAKES DISTRICT COUNCIL**

**IN THE MATTER** of the Resource Management Act 1991

**AND**

**IN THE MATTER** of Priority Area Landscape Schedules  
Variation to the Queenstown Lakes  
Proposed District Plan

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**Summary of Planning Evidence of Morgan Kendall Shepherd**

**24 October 2023**

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## **1 Introduction**

- 1.1 My name is Morgan Shepherd. My qualifications, planning experience and confirmation of my adherence to the Code of Conduct is outlined in paragraphs 1.1 – 1.3 of my evidence dated 11 September 2023.
- 1.2 For the purposes of today, I address the Kimiākau (Shotover River) ONF Priority Area with respect to the Gertrude's Saddlery Limited (GSL) land.
- 1.3 I attended the expert conferencing held on 3 October 2023 and signed the joint witness statement (JWS) dated 9 October 2023.
- 1.4 Ms Gilbert and Mr Espie have also signed a JWS which acknowledges points of agreement in relation to the Priority Area being an ONF (not a combined "ONF/L"), the correct mapping which excludes the GSL land, and the text for the Schedule of Landscape Values as set out in Ms Gilbert's rebuttal evidence.
- 1.5 I have read Mr Giddens' Summary of Planning Evidence dated 19 October 2023 and note that he is supportive of the Council's initial notified position in relation to the Kimiākau (Shotover River) ONF/L Priority Area. This matter was addressed in Ms Gilbert's rebuttal evidence and the landscape JWS, and is no longer the position supported by Council witnesses. Further, as set out in my evidence, creating an "ONF/L" Priority Area in the schedules and ultimately the PDP would be anomalous in the planning context. Although the policy framework is the same for both ONFs and ONLs, the rule framework is different, and this (introduction of an "ONF/L") would contradict the (in most cases) separate identification of the ONFs and ONLs in the PDP mapping. As stated in my evidence, there is an associated jurisdictional issue of amending the strategic policy SP 3.3.36 which identifies this Priority Area as an ONF, and directed the mapping and scheduling of the same.
- 1.6 At paragraph 31 Mr Giddens supports there being jurisdiction for amendments to the mapping to correct errors where non Rural Zone land has been included in the Priority Areas (such as the GCZ and GVRZ). I agree there is jurisdiction to make mapping amendments in this process, but I do not support his differentiation, or confining that jurisdiction only to 'errors' of the GCZ / GVRZ land.

**M Shepherd**

24 October 2023