

Before the Hearings Panel

For the Proposed Queenstown Lakes District Plan

Under the Resource Management Act 1991

In the matter of a variation to Chapter 21 Rural Zone of the Proposed Queenstown Lakes District Plan, to introduce Priority Area Landscape Schedules 21.22 and 21.23

**JOINT WITNESS STATEMENT OF LANDSCAPE EXPERTS ON 21.22.12 PA ONL
WESTERN WHAKATIPU BASIN**

[5 October 2023]



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INTRODUCTION

1. Queenstown Lakes District Council (**Council**) notified a variation to Chapter 21 Rural Zone of the Proposed Queenstown Lakes District Plan, to introduce Priority Area Landscape Schedules 21.22 and 21.23 (**the Variation**).
2. This Joint Witness Statement (**JWS**) follows on from the Hearing Panel's 4 August Minute and the 20 August memorandum filed on behalf of the Council. This JWS outlines the experts' agreement or disagreement on the following issues:
 - 2.1 21.22.12 PA ONL Western Whakatipu Basin Schedule of Landscape Values.
3. This JWS has been prepared by the following experts:
 - 3.1 Stephen Skelton (landscape) on behalf of Passion Developments Limited.
 - 3.2 Bridget Gilbert (landscape) on behalf of Queenstown Lakes District Council.
4. The qualifications and relevant experience of the experts are set out in the evidence filed by the experts in relation to the Variation.
5. In preparing this JWS the experts have relied upon the following material:
 - 5.1 The documents set out in our evidence in chief and, in the case of Ms Gilbert, her rebuttal evidence.
6. The JWS should be read in conjunction with the **21.22.12 PA ONL Western Whakatipu Basin Schedule of Landscape Values** attached as **Appendix 1**.

CODE OF CONDUCT

7. We confirm that we have read the Environment Court Practice Note 2023 and agree to abide by it.

POINTS OF AGREEMENT

8. The experts agree that the version of **21.22.12 PA ONL Western Whakatipu Basin Schedule of Landscape Values** attached as **Appendix 1** to this JWS is appropriate with the exception of one point outlined below.
9. This includes the amendments made to the landscape capacity comments for:
 - a. Passenger Lift Systems, arising from the change to the definition of Passenger Lift Systems in the Preamble to Schedule 21.22, agreed in the joint planning and landscape conferencing session on 3 October 2023.
 - b. the recommended change to the use of the no landscape capacity rating terminology agreed between the planning and landscape experts, at the conferencing session on 3 October.¹

POINTS OF DISAGREEMENT

10. The experts disagree with respect to the landscape capacity qualifying comments in relation to urban expansions in the Western Whakatipu PA ONL.
11. Mr Skelton is of the opinion that the (updated) 'extremely limited or no' landscape capacity rating for urban expansions should be qualified to acknowledge that infill urban development can occur near Fernhill. Mr Skelton explains his reasons in support of his opinion in his evidence.
12. Ms Gilbert remains of the view set out in her EiC and Rebuttal that urban expansion is inappropriate in an ONL, as such development would mean that the area where the urban expansion is occurring would fail to qualify as ONL. In her opinion, were urban expansion considered to be appropriate in the PA (for example, to achieve urban growth capacity goals), it would be necessary to have the ONL overlay 'lifted' before the infill urban

¹ i.e. 'no landscape capacity' rating terminology is changed to: **Extremely limited or no landscape capacity**: *there are extremely limited or no opportunities for development of this type. Typically this corresponds to a situation where development of this type is likely to materially compromise the identified landscape values. However, there may be exceptions where occasional, unique or discrete development protects identified landscape values.*

development could proceed. It is her understanding that such a process would require a plan change that is beyond the scope of the Variation.

DATED this 5th day of October 2023



Bridget Gilbert



Stephen Skelton