

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
21.22.18 PA ONL CARDRONA VALLEY**

5 October 2023

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 21.22.18 PA ONL Cardrona Valley Schedule of Landscape Values
3. This JWS has been prepared by the following experts:
 - 3.1 James Bentley (landscape) on behalf of OS 178 Soho Ski Area Limited and OS 221 Blackmans Creek Holdings No. 1 LP
 - 3.2 Benjamin Espie (landscape) on behalf of OS 185 Cardrona Distillery Limited
 - 3.3 Jeremy Head (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 Mr Head, his rebuttal evidence.
6. The JWS should be read in conjunction with the **Landscape JWS Version of the 21.22.18 PA ONL Cardrona Valley** 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 **21.22.18 PA ONL Cardrona Valley Schedule of Landscape Values** attached as **Appendix 1** to this JWS is appropriate with the exception of [9a and 9b] 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. Mr Head and Mr Espie disagree with respect to Mr Espie seeking a new activity: ‘rural industrial activities’ with a capacity rating and qualifiers to the Landscape Capacity section of the schedule. The purpose of this would be to acknowledge the Cardrona Distillery as a rural-industrial activity.
11. Mr Head is of the view that while some activities associated with the distillery may be considered to be ‘rural industrial’ in nature, such an activity does not need to be explicitly set out in the schedule. Further, the distillery does not exhibit the characteristics, or an outward appearance associated with typical ‘rural industrial’ activity. Mr Head is of the opinion that signalling rural industrial activity within the schedule (and an ONL) would appear potentially at odds with the protection of ONL values. This is largely due to the potential scale and visibility of such development and its incongruity in a highly natural landscape such as the Cardrona Valley.

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.*

12. Mr Head remains of the view set out in his rebuttal evidence (and as set out in the red text comment box in the Landscape JWS Version of the 21.22.18 PA ONL Cardrona Valley attached to this JWS).
13. Mr Espie is of the view that the schedule would benefit from giving a rating in relation to 'rural industrial activities' subject to suitable qualifiers and supports the wording set out below. Mr Espie is of the opinion that this wording signals only a very limited capacity and makes it clear that co-location, modest and sympathetic scale, and visual recessiveness are important. He considers that evolution of the existing distillery in accordance with this guidance will suitably protect the values of the Cardrona Valley ONL:

Rural Industrial Activities – very limited landscape capacity. If and where such development is appropriate, it will be co-located with existing rural industrial development on the valley floor and will be of a modest or sympathetic scale; have a low-key, visually recessive 'rural' character; and will complement the existing character of Cardrona settlement or the wider valley floor.

DATED this 5th day of October 2023



Jeremy Everett Head



Benjamin Espie



James Arthur Bentley