

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 21.22.1 PA ONF
PENINSULA HILL AND 21.22.16 PA ONL EASTERN WHAKATIPU BASIN**

[4 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 21.22.1 PA ONF Peninsula Hill Schedule of Landscape Values.
 - 2.2 21.22.16 PA ONL Eastern Whakatipu Basin Schedule of Landscape Values.
3. This JWS has been prepared by the following experts:
 - 3.1 James Bentley (landscape) on behalf of Coneburn Preserve Holdings Limited and Henley Downs Farm Holdings Limited; and Glencoe Station Limited and Glencoe Land Development Company 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 **21.22.1 PA ONF Peninsula Hill Schedule of Landscape Values** and **21.22.16 PA ONL Eastern Whakatipu Basin Schedule of Landscape Values** attached as **Appendix 1** and **Appendix 2** respectively.

CODE OF CONDUCT

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

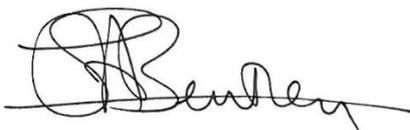
POINTS OF AGREEMENT

8. The experts agree that the version of **21.22.1 PA ONF Peninsula Hill Schedule of Landscape Values** and **21.22.16 PA ONL Eastern Whakatipu Basin Schedule of Landscape Values** attached as **Appendix 1** and **Appendix 2** (respectively) to this JWS are appropriate, subject to 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 Tuesday 3 October 2023¹. There are no points of disagreement between the experts in relation to the wording of the relevant PA Schedules.

DATED this 4th day of October 2023



Bridget Gilbert



James Bentley

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.*