

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
21.22.11 PA ONF Mount Iron**

4 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 21.22.11 PA ONF Mount Iron Schedule of Landscape Values.
3. This JWS has been prepared by the following experts:
 - 3.1 Ben Espie (landscape) on behalf of OS 141 Allenby Farms Limited.
 - 3.2 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 the EiC 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 21.22.11 PA ONF Mount Iron** 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 **21.22.11 PA ONF Mount Iron Schedule of Landscape Values** attached as **Appendix 1** to this JWS is appropriate with the exception of [9a] below.
9. This includes the amendments made to the landscape capacity comments for:
 - a. 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
 - b. Both experts agreed that the following amendment to the schedule will be appropriate as the effects of the amendment does not, in both experts’ opinions, substantially increase the size of the few dwellings in the PA ONF. Further, the amendment is limited to alterations and replacements of existing dwellings only and will enable a level of rural living development that protects ONF values: The recommended change is as follows (in italics): (xii) **rural living – extremely limited or no**² *landscape capacity excepting for the replacement or repairs of existing dwellings at the current building locations where the existing footprint and building height is not substantially exceeded and if so, other positive effects are included so that the landscape values are protected.*

POINTS OF DISAGREEMENT

10. None.

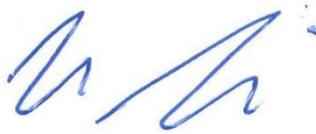
¹ i.e. ‘no landscape capacity’ rating terminology is changed to: **Extremely limited or no landscape capacity**: *there are extremely limited or no opportunities for development of this type. Typically this corresponds to a situation where development of this type is likely to materially compromise the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

² Ibid.

DATED this 4th day of October 2023



Jeremy Everett Head



Benjamin Espie