

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 21.22.6 PA ONF SLOPE HILL**

[4 October 2023]



Mike Wakefield / Katherine Viskovic
T: +64-4-499 4599
mike.wakefield@simpsongrierson.com
katherine.viskovic@simpsongrierson.com
PO Box 2402 Wellington

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 21.22.6 PA ONF Slope Hill Schedule of Landscape Values.
3. This JWS has been prepared by the following experts:
 - 3.1 Nikki Smetham (landscape) on behalf of the Milstead Trust 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.

CODE OF CONDUCT

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

POINTS OF AGREEMENT

7. The experts agree that the rebuttal version of **21.22.6 PA ONF Slope Hill** is largely 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 3 October¹.

POINT OF DISAGREEMENT

8. The only point of disagreement between the experts relates to the articulation of the Summary of Physical Landscape Values.
9. As stated in the JWS from the landscape conferencing that took place on Monday 2 October 2023, Ms Smetham is of the opinion that this PA Schedule (and all of the PA Schedules) should include the specific 'physical' landscape values in the Summary of Landscape Values that are key to this / or a particular ONF/L, and require protection in accordance with the policy direction, notwithstanding the necessity to read the PA Schedule/s in its entirety. In her opinion the associative and perceptual values and attributes are intertwined and cannot be readily separated.
10. Ms Gilbert is of the opinion that the PA Schedules comprise a summary of landscape attributes and values. In her view, all of the high value landscape attributes and values described in the Physical Values section of schedule are of relevance (as signalled in the Summary of Physical Values text). Given that the PA Schedule is a technical document that will primarily be referenced and interpreted by landscape experts (to assist decision makers), Ms Gilbert is of the view that landscape experts will understand which of those entries relate to high value physical landscape attributes and values. This means that no restructuring is required in this regard.
11. In addition, the Physical Values section of each PA Schedule is informed by other expert disciplines including geomorphologists and ecologists, with those experts supporting the wording (and structuring) of the PA Schedule as proposed in the notified version.
12. Further, in Ms Gilbert's view, the summarising of key landscape values is likely to undermine the acknowledgement by the experts (in the landscape conferencing session on Monday 2

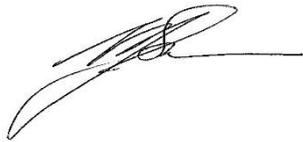
¹ i.e. 'no landscape capacity' rating terminology is changed to: **Extremely limited or no landscape capacity**: *there are extremely limited or no opportunities for development of this type. Typically this corresponds to a situation where development of this type is likely to materially compromise the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

October), that the PA Schedules (including 21.22 6) are intended to be read in their entirety to inform an understanding of landscape values in relation to each PA.

DATED this 5th day of October 2023

Bridget Gilbert

Bridget Gilbert



Nikki Smetham