

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
21.22.17 PA ONL VICTORIA FLATS**

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 21.22.17 PA ONL Victoria Flats Schedule of Landscape Values.
3. This JWS has been prepared by the following experts:
 - 3.1 Paul Smith (landscape) on behalf of OS 94 Cardrona Cattle Company 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 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 21.22.17 PA ONL Victoria Flats** 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 **21.22.17 PA ONL Victoria Flats 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 will not, in both experts’ opinions fail to protect ONL values. The recommended change is as follows (in italics): **Rural living – extremely limited or no² landscape capacity alongside SH6**. Some landscape capacity for rural living development *south of the landfill*. Both experts agreed that this would limit rural living activity to two discrete areas within the PA as opposed to the extent included in the rebuttal version of the schedule which included all areas in the Rural Zone (excluding the Gibbston Character Exception Zone). Further, both experts agreed that it was superfluous / out of context to include reference to the QLD solid waste facility in the capacity schedule and that reference to the QLD be deleted.
10. Both experts agreed that the technical reports that underpin the PA schedules should be location referenced via a link to a QLDC website. This website link should be included in the preamble (or where most appropriately and conveniently located). Both experts agreed that this matter is peripheral to the PA schedules wording (and intent) itself but is nonetheless important. Further resolution on this point will need to be provided by the Panel

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.

11. Both experts agreed that the Queenstown Trail – a public track should be included in the schedule as a new line item under the heading ‘Important recreation attributes and values’. The trail is shown passing through the PA on Google Maps but does not appear to be formed. Both experts agreed that Mr Smith will investigate the consent status of the Queenstown Trail within the PA prior to the hearing.

POINTS OF DISAGREEMENT

12. None.

DATED this 5th day of October 2023



Jeremy Everett Head



Paul Andrew Smith