

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

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**JOINT WITNESS STATEMENT OF LANDSCAPE EXPERTS ON 21.22.21 PA ONL WEST  
WANAKA**

**[5 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 21.22.21 PA ONL West Wanaka Schedule of Landscape Values.
3. This JWS has been prepared by the following experts:
  - 3.1 James Bentley (landscape) on behalf of Glendhu Bay Trustees 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 **21.22.21 PA ONL West Wanaka Schedule of Landscape Values** 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 with the Rebuttal version of **21.22.21 PA ONL West Wanaka Schedule of Landscape Values** except for one point, outlined below.
9. This includes 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.<sup>1</sup>

## POINTS OF DISAGREEMENT

10. The experts disagree with respect to the landscape capacity qualifying comments in relation to rural living.
11. The minor area of disagreement concerns the wording '*barely discernible*' under (xi) Rural Living within the capacity ratings. Mr Bentley prefers the wording '*reasonably difficult to see*' which is used within Chapter 6 PDP (Chapter 6 6.3.3.1 page 6-4).
12. Mr Bentley is supportive of having '*reasonably difficult to see*' from public roads in parts of the landscape where the rural character/ naturalness attributes of the landscape dominates (including from Roys Peak) and is visually recessive from other areas and other public viewpoints within the landscape.
13. Ms Gilbert considers that the existing level of visible built development consented in the PA suggests that any future rural living development should be '*barely discernible*' (rather than '*reasonably difficult to see*'), to appropriately manage cumulative adverse landscape effects.

<sup>1</sup> 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.*

DATED this 5<sup>th</sup> day of October 2023

*Bridget Gilbert*

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Bridget Gilbert

*James Bentley*

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James Bentley