

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

MEMORANDUM ON BEHALF OF COUNCIL REGARDING PRIORITY AREA MAPPING

20 October 2023



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MAY IT PLEASE THE PANEL

1. During the course of the hearing this week, Ms Evans offered for the Council to prepare and file a memorandum in order to clarify certain Priority Area mapping matters.
2. To assist the Panel, this memorandum:
 - (a) Provides a link to an updated Priority Area mapping resource, with instructions on how to use and view the updated mapping resource;
 - (b) Addresses the history of updates to the Priority Area mapping resource; and
 - (c) Clarifies Ms Bridget Gilbert's position on the 21.22.3 Kimiākau (Shotover River) PA ONF.

The Priority Area mapping resource

3. The Council team have prepared an updated GIS tool / resource for the purpose of assisting the Panel, and submitters. A link to the updated GIS tool is available here:

[IHP Application - Landscape Schedule Priority Area Variation \(arcgis.com\)](#)

4. This updated GIS tool has been prepared to show the following layers:
 - (a) The Proposed District Plan (**PDP**) Landscape Classification Boundaries (for the ONLs, ONFs and RCL). These boundaries form part of the PDP.
 - (b) The Priority Area Mapping that the Council elected to incorporate by reference into the PDP.

There are two layers that can be turned on, as described below:

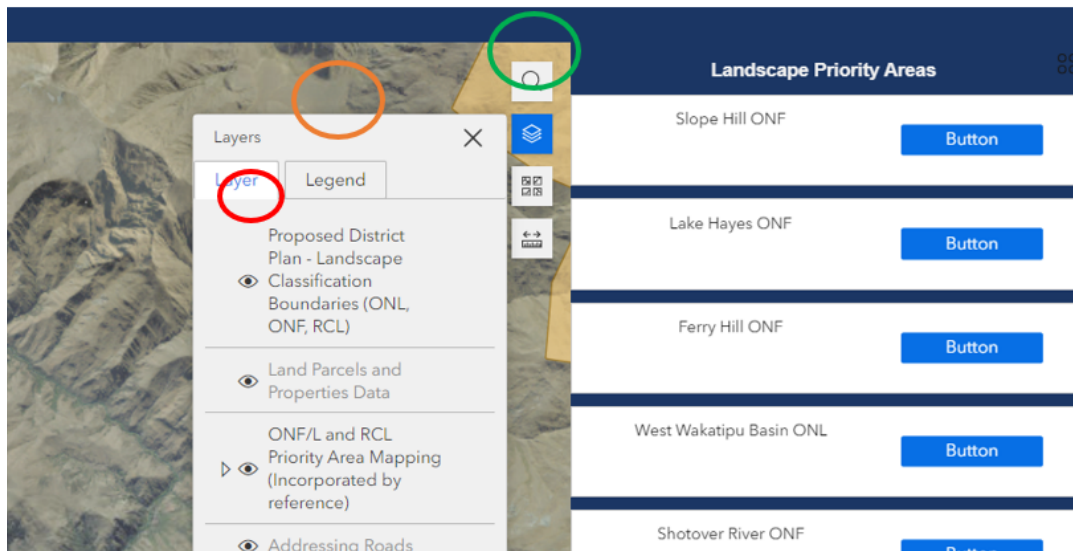
- (i) Green layer: March/April 2022 Priority Area mapping, this is the mapping agreed to in the 2020 JWS and confirmed by the Environment Court through the Topic 2 appeal process. This

mapping was used during the March/April 2022 pre-notification consultation on the Priority Area schedules.

(ii) Yellow layer: The June 2022 Priority Area mapping which incorporated clause 16 corrections. A copy of the clause 16 record was provided to the Panel on 16 October 2023.

(c) The GIS tool also shows: land parcel boundaries, roads, 20m contours, LINZ Topo mapping (20m contours) and aerial imagery.

5. The above layers can be toggled on and off by first selecting the layers tab (circled in green below), and then clicking on the 'eye' icon next to each layer (circled in red below). The legend can be accessed by clicking on 'legend' (circled in orange below).



6. The Council team notes that:

(a) When using the zoom in/out function, the legend will only show the layers that are turned on and displaying.

(b) For ease of referencing back to the Priority Area schedules, the labelling of each Priority Area in this updated mapping resource has been updated to align with the Priority Area schedules. The labelling has not been changed on the externally referenced GIS Priority Area mapping.

(c) The individual Priority Area 'buttons' along the right-hand side of the screen provide a link to each specific Priority Area map. This mapping

layer will only work if the ‘Yellow: June 2022 Priority Area mapping’ ‘eye’ icon is turned on.

7. To clarify, the updated GIS tool / resource provided by the above link has not replaced the existing GIS Priority Area mapping, and the Council has not made any clause 16 changes to the existing GIS Priority Area mapping.

History of updates to the Priority Area mapping resource

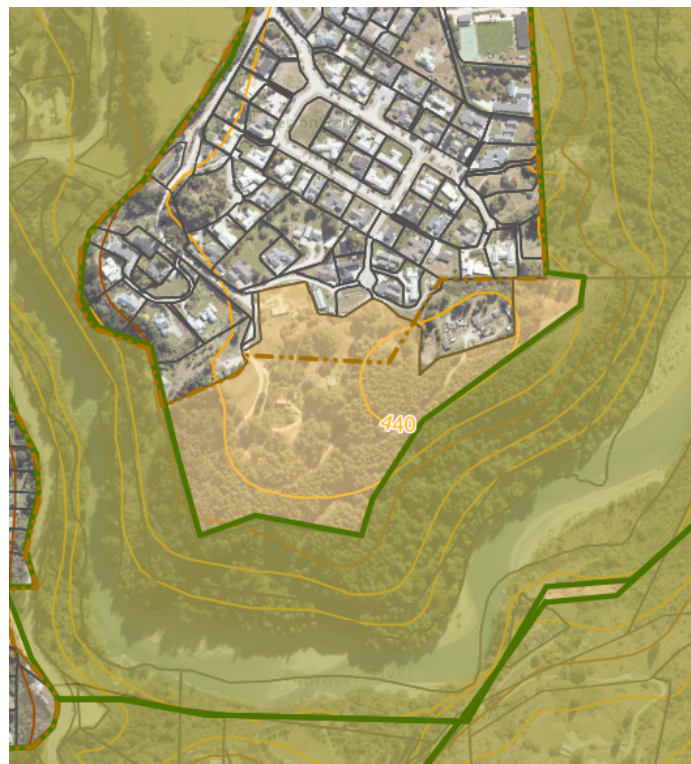
8. The table below sets out the history of the Priority Area mapping layers.

Event	Date	Layer Source
Priority Area boundaries confirmed	Topic 2, Decision 2.7	2020 JWS/Environment Court Priority Area mapping (green)
Priority Area boundaries added to PDP Overlay Polygons (PDP web mapping application)	December 2021	2020 JWS/Environment Court Priority Area mapping (green)
Informal consultation on Priority Areas	9 March 2022 to 3 April 2022	2020 JWS/Environment Court Priority Area mapping (green)
Clause 16 amendments made and applied to PDP layer in Overlay Polygons (PDP web mapping application)	July 2022	2022 Clause 16 Priority Area mapping (yellow)
Notification of Variation to include Priority Area schedules in Chapter 21	30 June 2022 to 26 August 2022	
Priority Area schedules removed from PDP overlay polygons (PDP web mapping application)	October 2023	

Ms Gilbert’s position on the 21.22.3 Kimiākau (Shotover River) PA ONF

9. The Panel Chairperson has sought clarification in relation to Ms Gilbert’s position on the 21.22.3 Kimiākau (Shotover River) PA ONF, in particular the associated Joint Witness Statement, dated 4 October 2023.
10. Ms Gilbert has confirmed that her expert landscape view is that the boundary of the 21.22.3 Kimiākau (Shotover River) PA ONF should align with the green mapping shown below. The green boundary excludes the 111 and 163 Atley Road sites.

11. Ms Gilbert acknowledges that this boundary does not marry up with the Outstanding Natural Landscape (**ONL**) boundary in this location, as modified by the Council's recent decision (which is now under appeal to the Environment Court). However, Ms Gilbert's evidence for this Variation, and the content of the Priority Area schedule she supports for the Kimiākau (Shotover River) PA ONF, does not address the area outside of the green boundary. The landscape classification of the Rural Zone land that is outside the mapped extent of the Kimiākau (Shotover River) PA ONF (as well as the zoning of that land) is a matter before the Environment Court.



DATED this 20th day of October 2023

M G Wakefield
Counsel for QLDC