

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
21.22.9 PA ONF KAWARAU RIVER**

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 21.22.9 PA ONF Kawarau River Schedule of Landscape Values
3. This JWS has been prepared by the following experts:
 - 3.1 Stephen Brown (landscape) on behalf of OS 171 Queenstown Park 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 21.22.9 PA ONF Kawarau River** 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 **21.22.9 PA ONF Kawarau River Schedule of Landscape Values** attached as **Appendix 1** to this JWS is appropriate with the exception of the two points below.
9. This includes the amendments made to the landscape capacity comments for:
 - a. Passenger Lift Systems, arising from the change to the definition of Passenger Lift Systems in the Preamble to Schedule 21.22, agreed in the joint planning and landscape conferencing session on 3 October 2023.
 - b. 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

POINTS OF DISAGREEMENT

10. The experts disagree with respect to the landscape capacity qualifying comments in relation to (ii) visitor accommodation and tourism related activities.
11. Mr Brown's evidence for OS 171 Queenstown Park Ltd recommends a text change to the first part of the capacity 'qualifying' comments in relation to visitor accommodation and tourism related activities. Relying on my experience of the area through site visits I remain of the opinion that the s42A text is appropriate with the inclusion of the word 'reasonably'. This is because the impression of the lower, flat parts of the PA including the river terraces is currently largely undeveloped, particularly with built structures which is of key importance to the landscape character and visual amenity values experienced from the various visual audiences signalled in the text. In my opinion, Mr Brown's recommended wording serves to undermine this characteristic for these audiences. Further, I consider that the relatively close proximity of the lower lying parts of the PA to an urban part of the district, the very close

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.*

proximity to a major waterway with a Conservation Order, and the highly popular Queenstown Trail, serves to heighten the visual (and landscape character) sensitivity of the area to development change.

12. Mr Head remains of the view set out in his rebuttal evidence (and as set out in the red text comment box in the Landscape JWS Version of the 21.22.9 PA ONF Kawarau River attached to this JWS).

DATED this 4th day of October 2023



Jeremy Everett Head



Stephen Kenneth Brown