

Before the Independent Hearings Panel

Under the Resource Management Act 1991

In the matter of the Upper Clutha Landscape Schedules Variation to the
Queenstown Lakes Proposed District Plan

**MEMORANDUM OF COUNSEL FOR QUEENSTOWN LAKES DISTRICT COUNCIL
REGARDING EXPERT WITNESS CONFERENCING**

1 July 2026



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MAY IT PLEASE THE PANEL

- 1.** This memorandum on behalf of Queenstown Lakes District Council (**Council**) addresses the directions contained in Minute 4 from the Panel in respect of expert witness conferencing.

EXPERT CONFERENCING

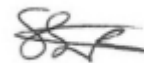
- 2.** Submitters have filed two expert landscape statements of evidence and three expert planning statements of evidence.
- 3.** Council considers that expert witness conferencing of the landscape and planning experts would assist.
- 4.** In accordance with [7.8] of Minute 4, the Council has prepared a draft expert conference agenda addressing outlining topics, attendees, days and times for conferencing, attached to this memorandum at **Schedule 1**.
- 5.** The purpose of joint planning and landscape conferencing is to address the topics that both planners and landscape experts provide evidence on at one time, in the interests of efficiency.
- 6.** The Council has conferred with the parties who have submitted the expert evidence and their feedback has informed the draft agenda. This includes Mr Ben Espie and Mr Stephen Skelton being unavailable on Tuesday 7th, and Ms Morgan Shepherd only potentially attending Monday 6th online .
- 7.** Mr Ken Fletcher is available to facilitate the expert conference on the dates outlined at **Schedule 1**. Mr Fletcher is an independent RMA hearing commissioner and mediator, with background experience as an Environment Court Commissioner.
- 8.** Additionally, a planner from the Council is available to scribe for conferencing.

DIRECTIONS SOUGHT

8.1 The Council seeks that the following directions are made:

- (a) an expert witness conferencing agenda is set in accordance with **Schedule 1** of this memorandum;
- (b) Mr Fletcher is appointed to facilitate the expert conference in accordance with [7.14] of Minute 4.

Dated: this 1st day of July 2026



K E Parker / S L Richardson
Counsel for Queenstown Lakes District Council

Schedule 1 - QLDC Upper Clutha Landscape Schedules Variation

EXPERT WITNESS CONFERENCING AGENDA AND TOPICS			
Date	Discipline	Topics	Attendees
<p>Monday, 6 July 9:00am-5:00pm</p> <p>Room 405 (Boardroom) Queenstown Resort College 7 Coronation Drive, Queenstown 9348</p>	<p>Landscape and planning</p>	<p>1. General Topic – appropriateness of the non-PA Schedules and Preamble 21.23</p> <ul style="list-style-type: none"> • What is the strategic support in objectives, policies of the PDP, and Otago RPS for the scheduling of non-PA RCL? • What is the utility of the non-PA Schedules, and will this be efficient and effective? Can they provide benefit in terms of PDP administration with respect to assessing suitability of outcomes proposed in specific consenting contexts? • Is the size of the non-PA RCL Landscape Schedule Areas an issue, meaning they should not be Scheduled? Should changes to the Preamble be made to address this? • Is there any benefit in including landscape capacity ratings (including urban expansion capacity) within the non-PA Landscape Schedules? • Planning issues on individual schedule text. <p>PA Schedule</p> <p>2. 21.22.25 Mata-au Clutha River Priority Area Schedule</p> <p>Non-PA Schedules</p> <p>3. 21.23.9 Wānaka Airport Environs</p>	<ol style="list-style-type: none"> 1. Bridget Gilbert (landscape) on behalf of QLDC. 2. Emily Frew (planning) on behalf of QLDC. 3. Benjamin Espie (landscape) – Topics 1, 2, on behalf of Submitters 8, 9, 16, 17, 19, 20, 21, 22, 26, 29, 30, 32, 35, 37, 43, 45. 4. Stephen Skelton (landscape) – Topic 2, 3 on behalf of Submitters 36, 39, 47. 5. Morgan Shepherd (planning) – Topic 1 on behalf of Submitters 16 and 31. (online if attending) 6. Daniel Curley (planning) – Topics 1, 2, on behalf of Submitters 9, 16, 17, 20, 21, 22, 29, 30, 35. 7. Scott Edgar (planning) – Topics 1, 2, behalf of Submitters 37, 43, 45, and further submitter 58.

Schedule 1 - QLDC Upper Clutha Landscape Schedules Variation

EXPERT WITNESS CONFERENCING AGENDA AND TOPICS			
Date	Discipline	Topics	Attendees
<p>Wednesday, 8 July 9:00am-5:00pm</p> <p>Room 405 (Boardroom) Queenstown Resort College 7 Coronation Drive, Queenstown 9348</p>	<p>Landscape</p>	<p>Non-PA Schedules</p> <p>4. 21.23.6 East of Wanaka Mount Aspiring Road</p> <p>5. 21.23.7 Studholme Road Schedule</p> <p>6. 21.23.10 Northern End of Criffel/Pisa Range Foothills</p> <p>7. 21.23.11 East of Luggate</p> <p>8. 21.23.13 Kane Road and Luggate-Taras Highway</p> <p>9. 21.23.14 Hāwea Moraine</p> <p>10. 21.23.15 Hāwea Basin</p> <p>11. 21.23.16 Crosshill</p>	<p>1. Bridget Gilbert (landscape) on behalf of QLDC.</p> <p>2. Benjamin Espie (landscape) – Topics 4-11, on behalf of Submitters 8, 9, 16, 17, 19, 20, 21, 22, 26, 29, 30, 32, 35, 37, 43, 45.</p>
<p>Thursday, 9 July 9:00am-12:00pm</p> <p>Room 405 (Boardroom) Queenstown Resort College 7 Coronation Drive, Queenstown 9348</p>	<p>Landscape and Planning</p>	<p>12. Any outstanding matters</p>	<p>1. Bridget Gilbert (landscape) on behalf of QLDC.</p> <p>2. Emily Frew (planning) on behalf of QLDC.</p> <p>3. Benjamin Espie (landscape) – Topic 12 on behalf of Submitters 8, 9, 16, 17, 19, 20, 21, 22, 26, 29, 30, 32, 35, 37, 43, 45.</p> <p>4. Stephen Skelton (landscape) – Topic 12 on behalf of Submitters 36, 39, 47.</p> <p>5. Daniel Curley (planning) – Topics 12 on behalf of Submitters 9, 16, 17, 20, 21, 22, 29, 30, 35.</p> <p>6. Scott Edgar (planning) – Topics 12 behalf of Submitters 37, 43, 45, and further submitter 58.</p>