

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 21.22.14 PA ONL
NORTHERN REMARKABLES**

[4 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 21.22.14 PA ONL Northern Remarkables Schedule of Landscape Values.
3. This JWS has been prepared by the following experts:
 - 3.1 Stephen Brown (landscape) on behalf of Queenstown Park 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 **Landscape JWS Version of the 21.22.14 PA ONL Northern Remarkables** 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 21.22.14 PA ONL Northern Remarkables Schedule of Landscape Values with the exception of one point outlined 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 visitor accommodation, tourism related activities and rural living.
11. Mr Brown is concerned about the potential for the Rebuttal Version of the 21.22.14 PA ONL Northern Remarkables schedule wording to result in a simple test of visibility as opposed to an evaluation that focuses on integration and the avoidance of effects on key landscape qualities of the PA. For these reasons, Mr Brown prefers the wording set out in his EiC.
12. Ms Gilbert remains of the view set out in her rebuttal evidence (and as set out in the red text comment box in the Landscape JWS Version of the 21.22.14 PA ONL Northern Remarkables attached to this JWS).

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.*

DATED this 4th day of October 2023

Bridget Gilbert

Bridget Gilbert

Stephen Brown

Stephen Brown