

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
21.22.19 PA ONL MOUNT ALPHA**

5 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 21.22.19 PA ONL Mount Alpha Schedule of Landscape Values.
3. This JWS has been prepared by the following experts:
 - 3.1 Nikki Smetham (landscape) on behalf of OS 173 Hawthenden 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 21.22.19 PA ONL Mount Alpha** 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 **21.22.19 PA ONL Mount Alpha Schedule of Landscape Values** attached as **Appendix 1** to this JWS is appropriate with the exception of the point below.
9. This includes the amendments made to the landscape capacity comments for:
 - a. 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. No disagreement to matters within scope.

DATED this 5th day of October 2023



Jeremy Everett Head



Nikki Smetham

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.*