

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 21.22.3 PA ONF
KIMIĀKAU (SHOTOVER RIVER)**

[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 21.22.3 PA ONF Kimiākau (Shotover River) Schedule of Landscape Values.

3. This JWS has been prepared by the following experts:
 - 3.1 Ben Espie (landscape) on behalf of Gertrude's Saddlery 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.

CODE OF CONDUCT

6. We confirm that we have read the Environment Court Practice Note 2023 and agree to abide by it.

POINTS OF AGREEMENT

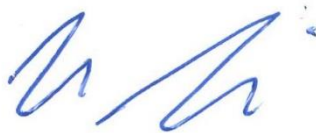
7. The experts agree that the correct and appropriate PA is an ONF PA and not an ONF/L PA.

8. The experts agree that the PA mapping attached to Ms Gilbert's EiC Figure 1 and Appendix 3 is the correct mapping. The PA mapping excludes the Gertrude Saddlery site from the 21.22.3 Kimiākau (Shotover River) PA ONF.
9. The experts agree that the version of 21.22.3 PA ONF Kimiākau (Shotover River) Schedule of Landscape Values in Ms Gilbert's rebuttal evidence is correct, subject to 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 Tuesday 3 October 2023.¹

DATED this 4th day of October 2023



Bridget Gilbert



Ben Espie

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.