

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
21.22.4 PA ONF MORVEN HILL**

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 21.22.4 PA ONF Morven Hill Schedule of Landscape Values.
3. This JWS has been prepared by the following experts:
 - 3.1 Steve Skelton (landscape) on behalf of OS 147 SYZ Investments 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 21.22.4 PA ONF Morven Hill** 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 **21.22.4 PA ONF Morven Hill Schedule of Landscape Values** attached as **Appendix 1** to this JWS is appropriate with the exception of [9a] 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
 - b. Both experts agreed that the following amendment to the schedule will be appropriate as the effects of the amendment will not, in both experts’ opinions fail to protect ONF values. A maximum of two or three building platforms for rural living activity will be possible amongst the rolling topography at the extreme base of the northern side of Morven Hill adjacent to SH6. The recommended change is as follows (in italics): (xii) **Rural living – extremely limited or no**² landscape capacity, except within existing approved residential building platforms *or where adjacent to SH6 on the extreme lower slopes of the Morven Hill ONF and where reasonably difficult to see.*

POINTS OF DISAGREEMENT

10. None.

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.*

² Ibid.

DATED this 4th day of October 2023

Handwritten signature of J. E. Head in cursive script.

Jeremy Everett Head

Handwritten signature of Steve Skelton in cursive script.

Steve Skelton