

**BEFORE THE COMMISSIONERS APPOINTED BY THE QUEENSTOWN
LAKES DISTRICT COUNCIL**

IN THE MATTER

Stage 3 of the Proposed District
Plan – Chapter 19A Three Parks

**Susan Robertson Sub# 3143.2
Roger Moseby Sub# 3110**

BRIEF OF EVIDENCE OF DANIEL MICHAEL CURLEY

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Introduction & Points of Evidence

1. My full name is Daniel Michael Curley. I hold the qualification of Bachelor of Environmental Management from Lincoln University. I am a director of IP Solutions Ltd, which is a land and asset development consultancy that offers land-development advice, resource management planning and project management. I have over 13 years of planning and land development experience in the Queenstown Lakes District, with many of these in planning specific roles with Vivian+Espie Ltd (Queenstown), Paterson Pitts Partners (Wanaka) and Civic Corporation Ltd (Wanaka).
2. Throughout my professional career, I have been involved in a wide range of resource management matters. I have made numerous appearances in front of hearing panels and I have also provided planning evidence to the Environment Court.
3. I have reviewed the Environment Court's code of conduct for expert witnesses and confirm that this evidence has been prepared in accordance with it. All opinions that I offer in this evidence are within my expertise. I have not omitted to refer to any relevant document or evidence except as expressly stated. I agree to comply with the code and in particular to assist the Commissions in resolving matters that are within my expertise.
4. While I was not engaged in the preparation of submissions filed by Susan Robertson (Submission #3143.2) or Roger Moseby (Submission #3110) I have been engaged to provide brief evidence relating to the submitters' land, being Lot 1 DP12726, Lot 1, DP 12296, which comprise 4.683ha and 2.353ha respectively.
5. My evidence relates only to the Council's obligation under Section 31(1)(a) of the Resource Management Act 1991 to provide for the **integrated** management of the effects of the use, development, or protection of land and associated natural and physical resources of the district.
6. Specifically, while the greater extent of the Three Parks land is generally owned or controlled, and being developed by Willowridge Developments Ltd (**Submitter**

#3220), any decision in respect of the final zoning of land should not reflect or relate to boundaries of land tenure only.

7. Given the specific location of the Submitter's land is in close proximity to the intersection of State Highway 84 and Sir Tim Wallis Drive, and shares a boundary with the State Highway, the Submitter's land is more suited to accommodate the Business Mixed Use Zone through its northern extent, moving south into High Density Residential Zoning or Medium Residential Zoning, which is then able to seamlessly integrate with greater extents of the current Three Parks Zone.
8. Such zoning will provide a logical transition from business activities that will benefit by road side visibility and access, while in turn providing for an establishment of land use activities that are less sensitive to noise effects (stemming from traffic movements associated with the site's proximity to roading corridors) to high or medium density residential land use in and further south of the Submitter's land.
9. Overall, there should be integrated approach to zoning outcomes across all land within the scope of the plan change, such that zoning outcomes on the Submitter's land are seamless with the greater extent of land generally controlled by Willowridge Developments Ltd.

Date: 29th day of May 2020

Dan Curley