

**BEFORE THE QUEENSTOWN LAKES DISTRICT COUNCIL
INDEPENDENT HEARINGS PANEL**

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of submissions to the Stage 1 Proposed
Queenstown Lakes District Council Plan
by **Mount Cardrona Station Limited
(407)**.

**STATEMENT OF EVIDENCE OF JEFFREY ANDREW BROWN
ON BEHALF OF MOUNT CARDRONA STATION LIMITED
TOPIC 11: CHAPTER 21 SKI AREA SUB ZONES**

28 March 2017

1 Introduction

1.1 My name is Jeffrey Andrew Brown. I have the qualifications of Bachelor of Science with Honours and Master of Regional and Resource Planning, both from the University of Otago. I am a full member of the New Zealand Planning Institute. I am also a member of the New Zealand Resource Management Law Association. I was employed by the Queenstown Lakes District Council (**QLDC**) from 1992 . 1996, the latter half of that time as the District Planner. Since 1996 I have practiced as an independent resource management planning consultant, and I am currently a director of Brown & Company Planning Group Ltd, a consultancy with offices in Auckland and Queenstown. I have resided in Auckland since 2001.

1.2 **Attachment A** contains a more detailed description of my work and experience.

1.3 I have complied with the Code of Conduct for Expert Witnesses contained in the Environment Court Consolidated Practice Note 2014. This evidence is within my area of expertise, except where I state that I am relying on another person, and I have not omitted to consider any material facts known to me that might alter or detract from the opinions I express.

1.4 This evidence is on behalf of Mount Cardrona Station Limited (submitter 407).

1.5 I address the Ski Area Sub Zones (**SASZ**) in Chapter 21 of the Proposed District Plan (**PDP**). I have read the Section 42A report prepared by Ms Banks for the Council (the First and Second Statements), and the evidence of Dr Read and Mr Davis. I have also read the evidence of Mr Espie for MCS. I comment on this material through my evidence.

1.6 My evidence is structured as follows:

Section 2 Background . I recap MCS's submission and its context;

Section 3 I address the location and the appropriateness of a passenger lift system link between the Cardrona SASZ and the Mount Cardrona Station Special Zone (**MCSSZ**);

Section 4 I set out the proposed changes to the Rural Zone provisions and the planning maps;

Section 5 I address s32 of the Act with specific focus on the principles for rezonings, as set out in the s42A report;

Section 6 I conclude with a discussion of Part 2 of the Act.

2 Background and MCS's submission on the SASZ

The Mount Cardrona Station Special Zone and Plan Change 52

2.1 MCS owns the land containing the MCSSZ. The MCSSZ is an urban zone located on the wide terrace immediately south of the Cardrona Ski Area access road and west of the Cardrona Valley Road near Cardrona Village. The zone provides for a commercial core (predominantly retail and visitor accommodation), community and recreational activities, and a range of residential densities (with a maximum of 1000 residential units through the zone). A copy of the operative MCSSZ Structure Plan is at [Attachment B](#). It delineates 7 Activity Areas.

2.2 The operative MCSSZ contains a rule enabling gondola infrastructure:

12.22.3.3 Discretionary Activities

...

- v. **Buildings and Structures associated with the erection and maintenance of a gondola within Activity Areas 6 and 7 that provides access from the Village Precinct to the surrounding recreational activities.**

2.3 In a process separate to the Proposed District Plan process, MCS has requested changes to the MCSSZ (Plan Change 52 (**PC52**), notified February 2017). One of the key changes is to rearrange the Structure Plan to provide for a golf course and related activities, to enable the zone to develop with year-round recreational attractions for permanent residents and visitors while retaining the central commercial and visitor accommodation core and the gradation of residential densities and other activities around it. A copy of the proposed new Structure Plan is at [Attachment C](#).

2.4 One of the other PC52 changes is to delete the discretionary rule for a gondola link and to insert a new controlled activity rule, as follows:

12.22.2.2 Controlled Activities

...

- viii. **Buildings and Structures associated with the erection and maintenance of a gondola within Activity Areas 6 and 7b that provides access from the Zone to the Cardrona Ski Area.**

Matters over which control is reserved:

- **Location**
- **External appearance**
- **Access and parking**
- **Balancing environmental considerations and operational characteristics**

- 2.5 The submissions to PC52 closed on 22 March 2017. No person submitted in relation to the change of status of a gondola facility from discretionary to controlled. Some submissions support PC52 and others only seek relatively minor amendments to it. No submission requests that PC52 be cancelled. The change in status of a gondola facility is therefore likely to be confirmed.
- 2.6 In 2015 MCS obtained a s139 Certificate of Compliance (**CoC**) for earthworks to create an additional car parking area to be used in conjunction with the existing Cardrona Ski Area. This was sought on the basis that the existing car parking area on the mountain is often at capacity. Shuttle buses would transport people from the carpark to the ski area, to avoid additional vehicle movements on the upper part of the access road and reduce the level of car parking congestion at the ski field. The carpark is located beside the point in the SASZ where the gondola route changes direction. This creates a number of passenger lift system options including:
- (a) a one-stage gondola accessed by road with the lower terminal within the existing SASZ adjacent to the CoC carpark;
 - (b) a two-stage gondola with the lower terminal within the MCSSZ and a mid-station in the SASZ adjacent to the carpark;
 - (c) a two-stage gondola as in (b) above but with a lower capacity segment bringing people from the MCSSZ up to the terminal within the existing SASZ;
 - (d) a one-stage gondola from the MCSSZ up to Cardrona Ski Area which just changes direction at this point (i.e. no mid-station).

MCS's PDP submission on the SASZ and passenger lift systems

- 2.7 MCS's submission is twofold:
- Part A** seeks to insert a new definition for *Passenger Lift Systems*, along with consequential rule changes, so that passenger lift systems would be a controlled activity inside the SASZ and a restricted discretionary activity outside the SASZ; and
 - Part B** seeks to change Planning Maps 10 and 24a to provide a corridor of SASZ between the Cardrona SASZ (at the west end of the corridor) and the MCSSZ (at the east end of the corridor).

Part A of the submission

- 2.8 Part A was dealt with in the Chapter 21 (rural zone) hearings (Stream 2). For the Council, Craig Barr in his right of reply statement agreed with my evidence in support of the submission and recommended that passenger lift systems are a controlled activity within the SASZ¹, and a restricted discretionary activity outside the SASZ².
- 2.9 In my Chapter 21 evidence I also recommended that, in Table 3 of the Rural Zone provisions, passenger lift systems should be exempted from the standards for buildings (along with farm buildings which are exempted). This appears to have been overlooked by the Council as there is no record of consideration of it in Mr Barr's right of reply on Stream 2 topics. Without that exemption, the passenger lift system pylons would need to meet the 8m height standard or require restricted discretionary activity consent to breach this standard. This seems unreasonable, given that the controlled activity criteria for passenger lift systems address effects on landscape values. These include assessment in relation to effects on the line and form of the landscape with special regard to skylines, ridges, hills and prominent slopes; the materials and colours to be used; and balancing environmental considerations with operational characteristics. Failure to include that exemption would defeat the purpose of providing controlled activity status for passenger lift systems because some pylons would almost certainly exceed 8m in height.
- 2.10 The rest of my evidence below assumes that oversight is corrected so that passenger lift systems in an SASZ are a controlled activity.

Part B of the submission

- 2.11 The corridor of SASZ connecting the MCSSZ and the SASZ is approximately 400m long and 200m wide. The planning map changes sought in the submission are shown in [Attachment D](#). It is proposed that this SASZ corridor is only for a passenger lift system and does not enable other SASZ activities.

Discussion

- 2.12 A passenger lift system linking the MCSSZ with the Cardrona Ski Area would, under the PDP, be subject to three zoning regimes:

¹ Right of Reply by Craig Barr for the QLDC, dated 3 June 2016, Appendix 1, Table 7, Rule 21.5.28

² *ibid*, Rule 21.4.9(b))

- (a) at the lower elevations (i.e. within the MCSSZ) the system would be a discretionary activity under the operative zone but is likely to be a **controlled activity** following PC52;
- (b) at the upper elevations within the PDP's Rural Zone **inside** the SASZ, the system would be a **controlled activity** (taking into account the height exemption that I addressed in paragraph 2.9 above);
- (c) within the 400m gap of Rural Zone lying **outside** the SASZ between the MCSSZ and the SASZ, the system would be a **restricted discretionary activity**, and the landscape assessment matters (which apply in the Rural Zone and do not apply within the SASZ or the MCSSZ) would apply. Hence, the 400m gap would be subject to a significantly different planning regime than within the SASZ immediately to the west and the MCSSZ immediately to the east.

2.13 The controlled activity status of the upper and lower ends would apply to 3.4 km, or 89.5% of the total system length. The restricted discretionary activity status would apply to 400m, or 10.5%, of the route. However, the overall planning status of the system would change from controlled to restricted discretionary, including the majority inside the SASZ (unless the consents could be unbundled+which is unlikely).

2.14 The combined outcome of PC52 and MCS's PDP submission Part B would be a passenger lift system that is a **controlled activity** between the MCSSZ and the base buildings at the Cardrona Ski Area. This is more efficient, in consent process terms.

3 **Appropriateness of the passenger lift system between the SASZ and the MCSSZ**

3.1 I support MCS's desire to provide for a passenger lift system link through a SASZ corridor between the MCSSZ and the Cardrona SASZ, for the following reasons:

- (a) The District Plan, through the MCSSZ, already anticipates a gondola connection;
- (b) A gondola terminal within the MCSSZ and close to the central village precinct at Activity Areas 1a and 1b is an easily walkable distance from the visitor accommodation, high density residential and surrounding residential precincts within the MCSSZ;
- (c) The MCSSZ is adjacent to a range of other activities including the growing cluster of activities around the valley entrance to the Snow Farm access road and the Cardrona Ski Area access road, such as the distillery and potentially the consented Snow Farm gondola facility;

- (d) The close proximity of the MCSSZ to the Cardrona Ski Area SASZ and the efficiencies of being able to transport people from the MCSSZ directly to the ski area base facilities. These efficiencies include the reduction of traffic on the ski area road, the reduction in traffic safety risk, improvement in fuel usage and lowering of emissions. The gondola can complement and provide an alternative means of mountain transport to the shuttle bus initiative of Real Journeys (which is proposed in PC52 by a new activity area, Activity Area 8c, which provides for a car park and bus transfer space within the MCSSZ adjacent to the Cardrona Ski Area access road);
- (e) The integration that gondolas can provide is more efficient if the connection is between the SASZ and an urban zone, as this further reduces the need for vehicle use (for example people could walk or take public transport from their home or hotel or hostel directly to the base facility, or the base facility may have an adjoining carpark so that vehicle trips are minimised. The integration it can provide appears to be supported by Ms Banks where she states that³:

the location of rezoning proposed may be the most logical location for a gondola link in terms of integrating with future land use, infrastructure and built forms

- (f) Mr Espie's evidence is that a gondola alignment that links a valley floor village to a high-altitude ski resort is the most logical and expected place to experience a gondola, in landscape terms because the gondola would be viewed within a particular part of Cardrona Valley that already accommodates considerable human modification of the landscape⁴. I agree with Mr Espie's conclusions on the landscape effects of a gondola in this location;
- (g) in relation to cumulative effects, Mr Espie's opinion is that the cumulative effects of a second gondola (in addition to the consented but unbuilt facility at the Snowfarm on the eastern side of the valley) would be mitigated as much as practicable. I agree with Mr Espie's conclusions on the cumulative effects of another gondola in this area;
- (h) For the Council Dr Read's opinion is that the SASZ corridor has little ability to absorb development *other than the anticipated gondola*⁵. I infer from that statement that Dr Read is not concerned about the effects of a gondola. The intention is for a gondola only, and I address the mechanism to ensure this in Part 4 below;

³ Second Statement of evidence of Kim Banks dated 10 March 2017, paragraph 2.30

⁴ Evidence of Ben Espie dated 28 March 2017, paragraphs 3.10, 5.1

⁵ Statement of evidence of Marion Read dated 10 March 2017, paragraph 5.25

- (i) The controlled activity assessment matters in both the MCSSZ and the SASZ provide the opportunity for conditions to be imposed to ensure that any passenger lift system is appropriate in relation to visual and landscape effects, complementarity to carparking, and ecology, and in achieving that appropriately balances operational requirements with environmental considerations;
- (j) There are no other technical impediments to a passenger lift system in this location. MCS has commissioned the following reports to support the gondola link between the MCSSZ and the Cardrona Ski Area base facilities:
 - Feasibility: Leitner Poma (Feasibility, Plans and Long Sections Sept/Oct 2015);
 - Geology: Royden Thomson, May 2015.
- (k) These reports and the landscape witnesses' opinions confirm that a gondola is practically feasible and that adverse effects can be mitigated in this location, which should satisfy Ms Banks' concerns about feasibility and effects mitigation⁶.

3.2 Ms Banks also questions the commercial viability of the project. Commercial viability will be a function of a myriad of variables which I have no evidence about and so I am unable to comment. However, I question whether commercial viability is a valid concern for this hearing which is about facilitating the zoning opportunity for a passenger lift system in this location. On the basis that the environmental effects (including, particularly, the landscape effects) are acceptable, I consider that the proposal is appropriate.

3.3 In summary, I consider that the narrow corridor of SASZ connecting the MCSSZ and the SASZ, to enable a controlled activity passenger lift system from the MCSSZ to the Cardrona Ski area base facilities, as sought by MCS is appropriate because:

- (a) It is appropriate in relation to effects on landscape and other environmental values; and
- (b) It provides for a consistent, efficient and effective consenting regime.

4 Specific changes to the PDP

4.1 I agree with Mr Espie and Ms Read that the activities within this specific new SASZ corridor should be confined to a passenger lift system. This can be achieved as follows:

⁶ Second Statement of Evidence of Kim Banks, dated 10 March 2017, paragraph 2.30

- (a) Insert new rules (with consequential re-numbering) into Table 7 . Ski Area Activities within Ski Area Sub Zones, as follows (additions underlined):

Rule	Table 7 – Ski Area Activities within the Ski Area Sub Zones	Activity
<u>21.5.X</u>	<u>Within Area A on Planning Maps 10 and 24a, passenger lift systems [excluding any terminal and associated base facilities]</u>	<u>C</u>
<u>21.5.Y</u>	<u>Within Area A on Planning Maps 10 and 24a, activities listed in Table 7 other than passenger lift systems</u>	<u>NC</u>

Note that the words “[excluding any terminal and associated base facilities]” are in square brackets because they will not be necessary if the Panel accepts Mr Barr’s recommended definition of “Passenger Lift System” because that definition excludes base and terminal buildings.

- (b) Insert a new area of SASZ marked as “Area A+” on the extension shown on Planning Maps 10 and 24a, in **Attachments D & E**.
- (c) A survey accurate plan showing the exact measurements of the subzone extension is shown in **Attachment F**.

5 Section 32 evaluation

5.1 Kim Banks' first Brief of Evidence sets out principles for considering the various requests for SASZ extensions⁷. She does not undertake the exercise she says is necessary in relation to this proposed SASZ extension, so I address each of these principles below.

- (a) **Whether the change is consistent with the objectives and policies of the proposed zone. This applies to both the type of zone in addition to the zone boundary.**

5.2 The relevant PDP objectives and policies for the SASZ are:

Objective

21.2.6 Encourage the future growth, development and consolidation of existing Ski Areas within identified Sub Zones, while avoiding, remedying or mitigating adverse effects on the environment.

Policies

⁷ First Statement of Evidence of Kim Banks, dated 10 March 2017, paragraphs 13.9 . 13.12

- 21.2.6.1 Identify Ski Field Sub Zones and encourage Ski Area Activities to locate and consolidate within the sub zones**
- 21.2.6.2 Control the visual impact of roads, buildings and infrastructure associated with Ski Area Activities**

5.3 My view is that the SASZ corridor extension between the SASZ and the MCSSZ will enable passenger transport facilities that will contribute positively to the future of the SASZ and enable the consolidation of the Cardrona Ski Area SASZ in a way that avoids and mitigates adverse effects on the environment.

5.4 The additional visual impact of the gondola will be limited to the use of the SASZ corridor extension. Paragraph 3.1(h) above sets out the matters of control over visual impacts of the infrastructure, and this is consistent with policy 21.2.6.2. The evidence of the landscape experts confirms that visual impact effects are acceptable in this location.

(b) Whether the zone proposed / sought is more appropriate than the proposed zone

5.5 The PDP's notified zone is the Rural Zone, outside the SASZ. Under the notified provisions a passenger lift system would be a non-complying activity within the 400m gap between the SASZ and the MCSSZ. With the modifications accepted by Mr Barr in Stream 2, passenger lift systems would be a restricted discretionary activity outside the SASZ. My view is that, for the reasons I have expressed above, it is more appropriate for a passenger lift system in this location to have a consistent controlled activity consent status for its whole length. The 400m SASZ corridor is therefore the appropriate mechanism.

(c) Whether the change is consistent with and does not compromise PDP Strategic chapters and in particular the Strategic Direction, Urban Development, and Landscape chapters

5.6 The following higher order goals, objectives and policies are relevant:

Goal

3.2.1 To develop a prosperous and resilient economy

Objective

3.2.1.3 To enable the development of innovative and sustainable enterprises that contribute to diversification of the District's economic base and create employment opportunities.

Policies

3.2.1.3.1 Provide for a wide variety of activities and sufficient capacity within commercially zoned land to accommodate business growth and diversification.

3.2.1.3.2 Encourage economic activity to adapt to and recognise opportunities and risks associated with climate change and energy and fuel pressures.

Objective

3.2.1.4 Recognise the potential for rural areas to diversify their land use beyond the strong productive value of farming, provided a sensitive approach is taken to rural amenity, landscape character, healthy ecosystems, and Ngai Tahu values, rights and interests.

Goal

3.2.5 Our distinctive landscapes are protected from inappropriate development.

Objective

3.2.5.3 To direct new subdivision, use or development to occur in those areas that have potential to absorb change without detracting from landscape and visual amenity values.

5.7 I consider that SASZ corridor is consistent with these higher order provisions because:

- (a) it will contribute to a prosperous and resilient economy and assist in sustainability of both the ski area and the MCSSZ;
- (b) it will contribute to the variety of activities and potentially support the commercially zoned MCSSZ land in its role of attracting and supporting business growth and diversification within the MCSSZ village;
- (c) it is about recognising the opportunities and risks associated with climate change and energy and fuel pressures;
- (d) The location of the SASZ corridor, in the narrow gap between the SASZ and the MCSSZ, has capacity to absorb change and the gondola development would not be inappropriate in this setting. Dr Read's and Mr Espie's evidence are relevant in this regard.

(d) The overall impacts of the rezoning gives effect to the OPRS

5.8 The operative Regional Policy Statement contains objectives and allied policies that are relevant to this proposal, including:

- 4.4.1 to 4.4.5 (Manawhenua Perspective);
- 5.4.1 to 5.4.5 (Land);
- 9.4.1 to 9.4.3 (Built Environment);
- 10.4.1 (Biota).

5.9 The subject matter of these provisions is not materially different to that of the PDP's higher order provisions. I do not consider that the SASZ corridor is contrary to the ORPS provisions. There are no significant ecological issues, and landscape issues are addressed sufficiently by Mr Espie.

(e) Economic costs and benefits are considered

5.10 Economic costs and benefits include:

- There are consenting costs for the passenger lift system regardless, but would be greater if the corridor is not put in place;
- The passenger lift system has benefits in relation to reducing use of the road and consequential reduction in fuel use and emissions;
- The system would also benefit the MCSSZ and the wider Cardrona area by adding to the winter (snow sports) and non-winter (hiking, running, mountain biking, sight-seeing etc) recreational attractions for residents and visitors, and further promoting the district.

5.11 I consider that the economic benefits of enabling a controlled activity passenger lift system in this location outweigh the costs.

(f) Zone changes could take into account the issues debated in recent plan changes

5.12 PC52 is relevant. All submissions are in support (with some requested modifications). One of the changes is to the status of a gondola link, from discretionary to controlled, as I discussed above. No submission challenges that change.

(g) Changes to the zone boundaries area consistent with the maps in the PDP that indicate additional overlays or constraints (e.g. Airport Obstacle Limitation Surfaces, SNAs, Building restriction Areas, ONF/ONL);

5.13 There are no overlays or constraints other than the ONL classification of the area west of the MCSSZ. Mr Espie has addressed the ONL issues and I agree with his evidence.

(h) Changes should take into account the location and environmental features of the site (e.g. the existing and consented environment, existing buildings, significant features and infrastructure);

5.14 There are no existing buildings, significant features or infrastructure. The outcome of the proposal is a zoned corridor within which infrastructure for a passenger lift system (pylons and wires only) could be constructed, subject to consent. The zoned environment of the MCSSZ, which supports this proposal, may be relevant to this consideration.

- (i) **Zone changes recognise the availability or lack of major infrastructure (e.g. water, wastewater, roads);**
- (j) **Zone changes take into account effects on water, wastewater and roading network capacity, and are not just limited to the site specific effects of extending infrastructure;**
- (k) **There is adequate separation between incompatible land uses**
- (l) **Rezoning in lieu of resource consent approvals, where a portion of the site has capacity of absorb more development does not necessarily mean another zone is more appropriate; and**
- (m) **Zoning is not determined by existing resource consents and existing use rights, these will be taken into account.**

5.15 These principles are not relevant. The SASZ will not require civil infrastructure; no incompatible land uses will arise; there are no relevant resource consents or existing use rights.

5.16 Ms Banks also addresses context factors⁸ which I address as follows:

- (a) **The layout of road access, public open space and community facilities;**

5.17 The SASZ corridor will not affect the established road access to the Cardrona Ski Area, or the open space areas proposed within the MCSSZ.

- (b) **Land with physical challenges such as steep topography, poor ground conditions, instability or natural hazards**

5.18 The land is steep in parts but the information available indicates that the corridor route is feasible for a safe passenger lift system.

- (c) **Land with other identified significance values (environmental, cultural, amenity, heritage); and**
- (d) **The vulnerability of the wider area the subject land is part of to the adverse effects of development.**

⁸ First Statement of evidence of Kim Banks dated 10 March 2017, paragraphs 13.11 . 13.12

- 5.19 The land is part of the ONL classification. Mr Espie supports the SASZ corridor, as discussed above, and I agree with his findings.

6 Part 2 of the Act

Section 6

- 6.1 In relation to Section 6(b) (the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development), I agree with Mr Espie's opinion that the particular area within which the SASZ extension would sit is less natural than most areas of ONL within the district, and that the slopes leading up to Mount Cardrona are not of the entirely unmodified, wild and dramatic character of other ONLs. I therefore consider that a SASZ extension in this stretch of ONL, limited only to a passenger lift system (excluding terminal and base buildings) is appropriate.

Section 7

- 6.2 The modifications sought in this submission are directly relevant to achieving the following matters to which particular regard must be given:
- (b) **the efficient use and development of natural and physical resources;**
 - (ba) **the efficiency of the end use of energy;**
 - (c) **the maintenance and enhancement of amenity values;**
 - (f) **maintenance and enhancement of the quality of the environment;**
 - (g) **any finite characteristics of natural and physical resources;**
- 6.3 The provision of gondola access between the SASZ and the nearby MCSSZ urban zone is an efficient use and development of natural and physical resources given the speed and effectiveness at transporting large numbers of people from the valley floor settlement to the Cardrona ski area facilities, the reduction in use of fossil fuels through removing the need for all SASZ users to use cars or buses to access the SASZ, and comparative efficiency in the end use of the energy for the gondola vis-à-vis fossil fuels.
- 6.4 The SASZs are a finite resource in that they possess a rare combination of attributes (adequacy and merit of snow, terrain, accessibility, serviceability). Maximising the efficiency of their use and development is important for the long term economic wellbeing of the District. Urban zonings in close proximity to the SASZ areas are also a finite resource, and enabling direct

access between the future MCSSZ settlement and the Cardrona Ski Area will contribute strongly to this synergy. A gondola link perfectly complements the MCSSZ and the key intended outcome of PC52 which is to provide year-round recreational attraction to Cardrona.

Section 5

- 6.5 I consider that the new corridor of SASZ to link the MCSSZ and the SASZ at Cardrona is appropriate. It enables another access mode to the Cardrona ski area from an urban zone where there will be a concentration of residential, visitor accommodation and commercial activities, and will have efficiencies I discussed under section 7(c) above. Any potential adverse effects on landscape values have been addressed by Mr Espie, and the controlled activity assessment criteria can be used to fine tune a proposal to avoid or mitigate potential adverse effects.
- 6.6 For these reasons, in my view the modifications described in my Part 4 above achieve the purpose and principles of the Act.

J A Brown
28 March 2017

A**Curriculum vitae – Jeffrey Brown****Professional Qualifications**

1986: Bachelor of Science with Honours (Geography), University of Otago

1988: Master of Regional and Resource Planning, University of Otago

1996: Full Member of the New Zealand Planning Institute

Employment Profile

May 05 . present: Director, Brown & Company Planning Group Ltd . resource management planning consultancy based in Queenstown and Auckland. Consultants in resource management/statutory planning, strategic planning, environmental impact assessment, and public liaison and consultation. Involved in numerous resource consent, plan preparation, changes, variations and designations on behalf of property development companies, Councils and other authorities throughout New Zealand.

1998 . May 2005: Director, Baxter Brown Limited . planning and design consultancy (Auckland and Queenstown, New Zealand). Consultants in resource management statutory planning, landscape architecture, urban design, strategic planning, land development, environmental impact assessment, public liaison and consultation.

1996-1998: Director, JBA, Queenstown . resource management consultant.

1989 . 1996: Resource management planner in several local government roles, including Planner (1992 . 1994) and District Planner (1994 . 96), Queenstown-Lakes District Council. Held responsibility for all policy formulation and consent administration.

Other

- New Zealand Planning Institute . presenter at *The Art of Presenting Good Planning Evidence* workshops for young planners (2016 .)
- Judge, New Zealand Planning Institute Best Practice Awards (2017 .)

List of projects (selected examples only)

- Numerous applications/rezoning/designation requests for a variety of development projects throughout New Zealand.
- Various: involvement in Proposed Auckland Unitary Plan process, representing parties in relation to Regional Policy Statement, Regional Plan, and District Plan chapters, covering urban growth, coastal, rural, ecological, industrial, business and residential topics (2013 . 2016);
- Various: involvement in Queenstown-Lakes District Proposed District Plan submissions and hearings, 2015 . present)
- Various: involvement in Queenstown-Lakes landscape cases (including C180/1999 and subsequent cases, 1998 . 2003);
- Various: Involvement in numerous rural subdivision and development applications, Queenstown-Lakes, Central Otago, Auckland, Selwyn, Thames-Coromandel, Far North Districts, 1996 . present;
- Housing New Zealand Corporation . analysis of housing stock and planning implications (2010);

- Huapai Triangle, West Auckland: planner and lead consultant to 65ha Special Housing Area plan change, operative 2015;
- Ministry of Education . involvement in numerous planning processes for education facilities in northern North Island;
- Auckland Council: seconded for evaluation of Special Housing Area proposals;
- Samson Corporation Ltd / Sterling Nominees Ltd . inner city and business/industrial redevelopment projects, Auckland (2001 . present);
- Melview Developments Ltd . high density hotel and residential development, Queenstown (2005 . 2008);
- Equinox Group / Thomas & Adamson Ltd . high density affordable housing project, Flat Bush, Manukau (2012 . present);
- Hawthorne Estates Limited . rural residential development, Wakatipu, 2001
- Queenstown Lakes District Council . Aquatic Centre development . designation and associated consents (2004 . 2005);
- Wellington International Airport Limited . resource management advice, evidence and other reports and advice on property interests (2004 . 2006);
- Mount Cardrona Station Limited . rezoning to create 1000 unit village and associated village centre and related activities (2005 . present) (**winner 2008 Resource Management Law Association Awards – Best Documentation**);
- Mount Cardrona Station Limited . plan change to reconfigure aspects of the village to incorporate golf (2016 .);
- Wanganui District Council . Industrial & Residential Strategic Plan for Wanganui (1998) and follow up strategic research and report (2005);
- Remarkables Park (100 ha residential/mixed-use, Queenstown) . key resource management advisor . up to 400 residential and visitor accommodation units, large format retail and shopping precinct and riverside village;
- Caughey Preston Home (Remuera, Auckland) . zone change to better enable expansion of established aged care facility and Proposed Auckland Unitary Plan process (2009 . 2016);
- Whangarei District Council/NZ Fire Service . designations for new facilities (2002);
- Omaha Park Ltd . rezoning proposals for residential/visitor accommodation/recreation facilities at Omaha, Rodney District (2001 . present);
- Otahu Properties Ltd / Gusty Limited / Taieri Bush Limited . coastal and lifestyle subdivisions, Coromandel Peninsula, 2013 . present;
- The Hills Golf Course . sculpture park, golf course, residential development, Arrowtown (2004 . 2009) (**winner 2009 Resource Management Law Association Awards – Best Project**).
- Mt Rosa Partnership / Management Systems Ltd (100 hectares, vineyards, winery, rural residential, State Highway 6, Gibbston Valley 1998-1999, 2003);
- Waitiri Station Ltd (150 hectares, vineyards, rural residential and high density residential, State Highway 6, Gibbston Valley, 1999 - 2000);
- Blanket Bay Lodge (visitor accommodation, Wakatipu, 1998-1999);
- Matakauri Lodge (visitor accommodation, Closeburn, 1998 . 2000);
- Perron Developments . Sofitel Hotel, Queenstown (2002 . 2005);
- Columbia Pictures, Sony Entertainment/Tristar (Sound Stages for movie production/other movie locations (1999-2001);
- Witness in numerous Council hearings and Environment Court hearings since 1993.

Operative Structure Plan

STRUCTURE PLAN A - Mt Cardrona Station Structure Plan

LEGEND

ACTIVITY AREAS

- Activity Area 1a— Village Centre
- Activity Area 1b— Village Centre
- Activity Area 2a— Living Area A
- Activity Area 2b— Living Area B
- Activity Area 3— Living Area C
- Activity Area 3a— Living Area D
- Activity Area 3b— Educational and Community Facilities
- Activity Area 4— Living Area E
- Activity Area 5a— Woodshed Site
- Activity Area 5b— Homestead Site
- Activity Area 6— Commonage
- Activity Area 6a— Commonage/Community Facility Site
- Activity Area 7— Heritage Area
- Activity Area 8a— Cardrona Ski Field Road: Activities and Access
- Activity Area 8b— Cardrona Ski Field Access Road: Access

Indicative alignments of existing historical water races

Indicative Alignment of Homestead Gully Creek

Zone Boundary

Mitigation banding - No build

Building Restriction Line

Building Restriction Line—Maximum Height 4.5m

No. Please note Building Restriction Lines for Activity Area 1b are contained in a separate Plan - Structure Plan B Village Height Restriction Lines

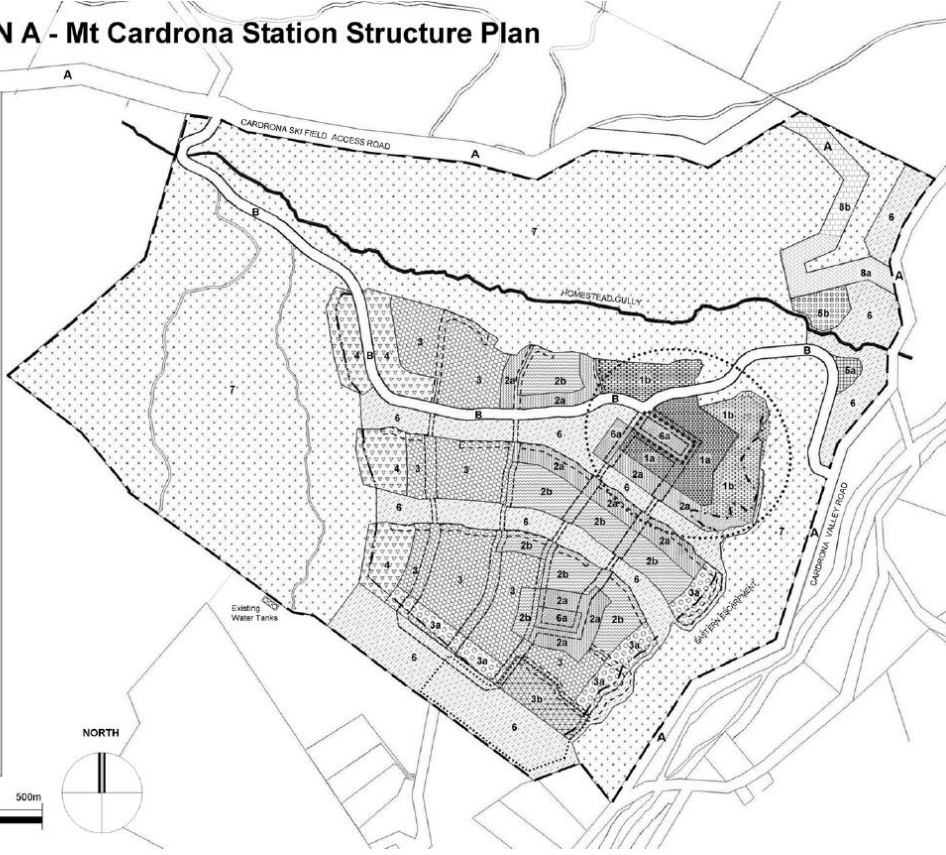
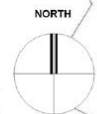
Village Precinct

Village Green

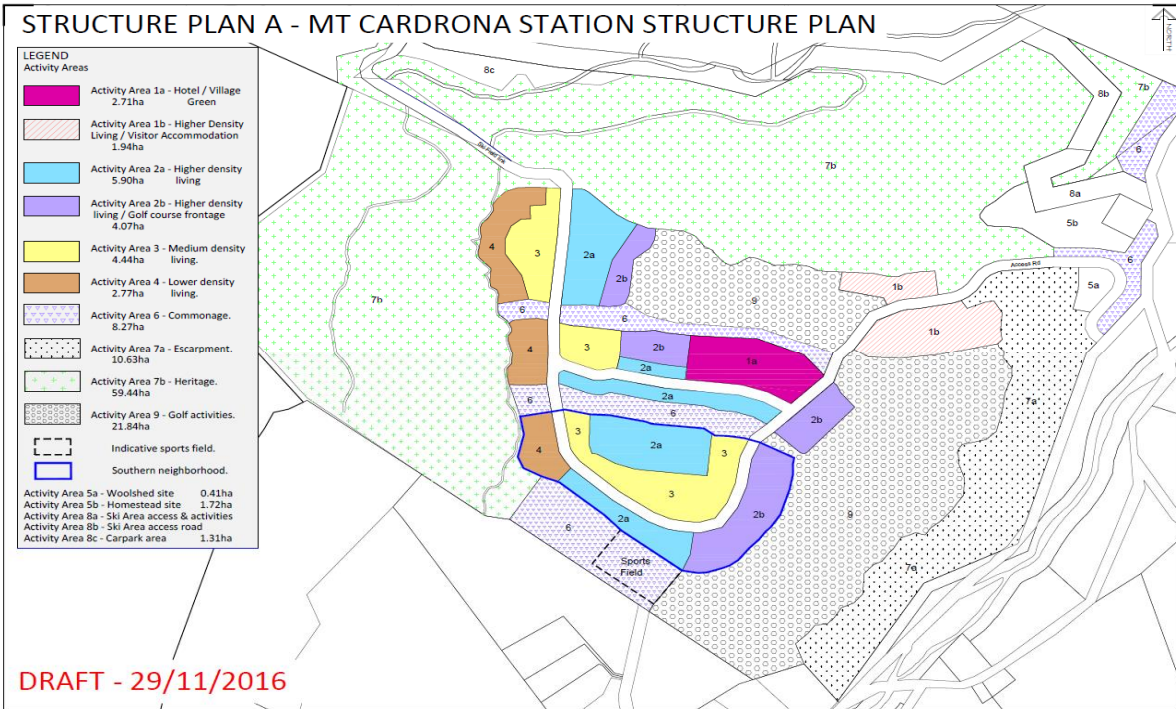
Indicative Education Precinct

KEY INFRASTRUCTURE PANEL

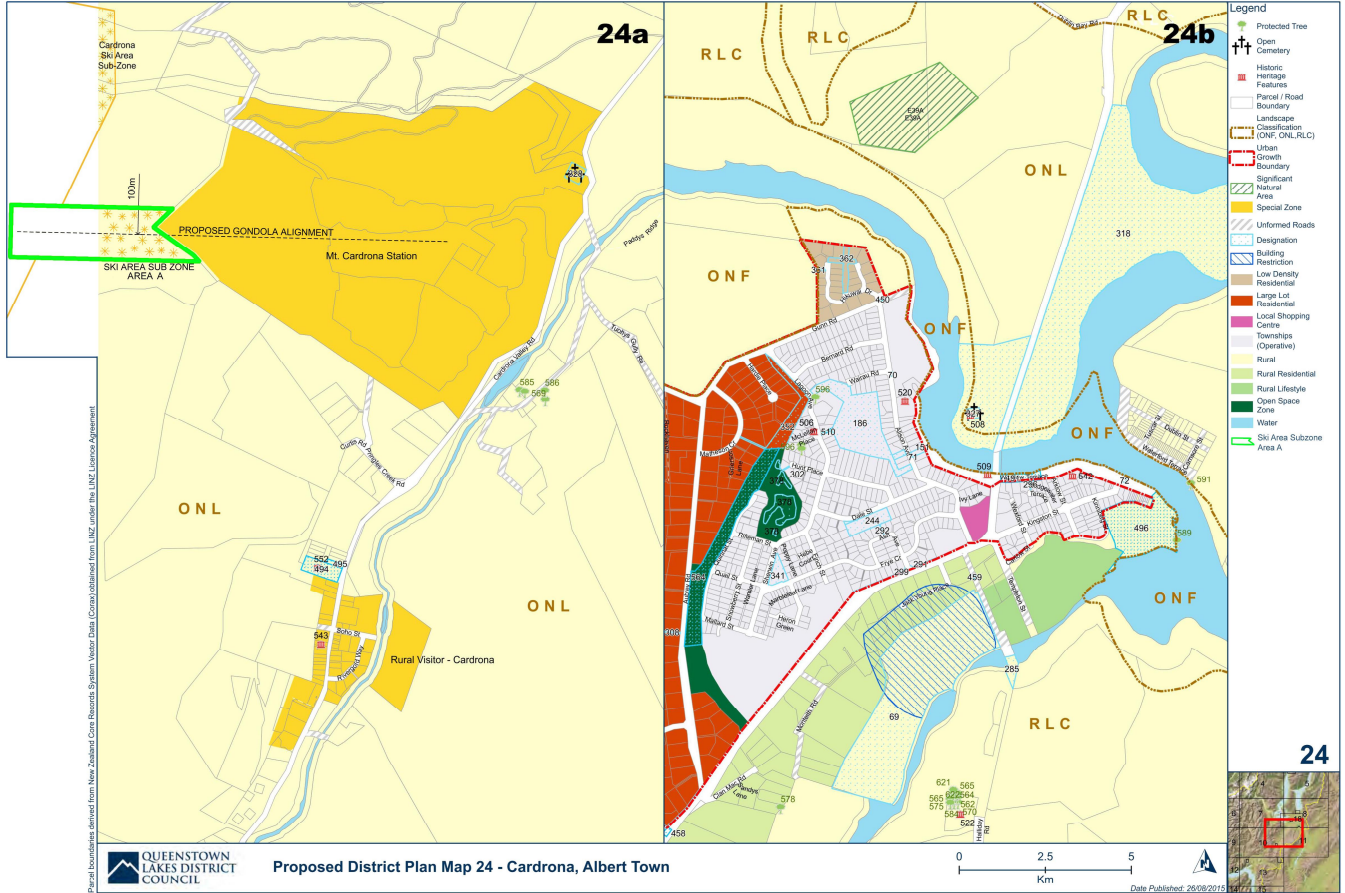
- Existing Roads
- Main Access / Through Route
- Local Access Roads — Indicative



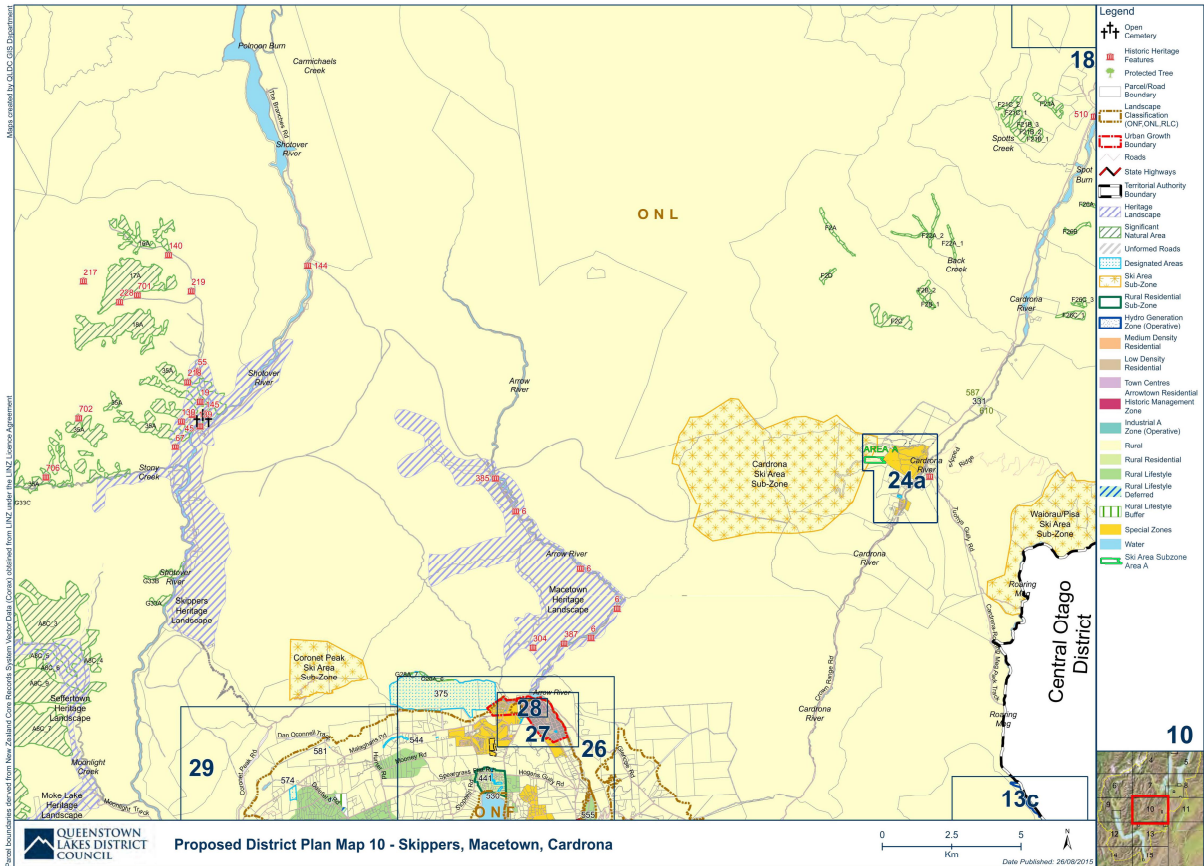
Proposed Structure Plan



Proposed District Plan Maps 24a & 24b



Proposed District Plan Map 10



F

Proposed Extension to Ski Area Subzone

