

BEFORE THE QUEENSTOWN LAKES DISTRICT COUNCIL

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the Publicly Notified Plan Change 50

AND

IN THE MATTER of Submissions by Adam & Kirsten **ZAKI** and Carl & Lorraine **HOLT**

AFFIDAVIT OF BRUCE ALLAN MCLEOD

Sworn: January 2015

Solicitor Acting: C P Thomsen

Webb Farry

Lawyers

79 Stuart Street

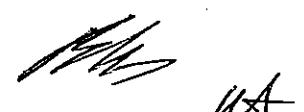
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Handwritten signatures in the bottom right corner of the page.

I **BRUCE ALLAN MCLEOD** of Queenstown, Surveyor, swear:

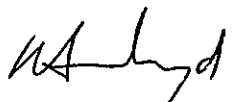
- My name is Bruce Allan McLeod. I am a licenced cadastral surveyor and director of Aurum Survey Consultants Limited, a surveying and resource management consultancy firm based in Queenstown. I have been practicing as a surveyor for 19 years and a director of Aurum for 10.5 years.
- I received a bachelor of surveying degree from Otago University in 1996 and became a licensed cadastral surveyor in 2001.
- I have been instructed by the owners of 40A and 40B Man Street, Queenstown to prepare plans showing the height of buildings upon land to the immediate southeast of those properties legally described as Sections 10, 11, 17 and 18 Block VIII Town of Queenstown, held in CFRs OT97/220, OT4A/50, OT168/152 and OT13C/222 respectively (the "Crowne Plaza Land").
- In preparing these plans I have read and agreed to comply with the Environment Court's Code of Conduct for Expert Witnesses from its 2014 Practice Note. I confirm that the preparation of this plan is within my area of expertise and I have not omitted to include or consider any relevant information when preparing it.
- The plans show the height of possible buildings on the Crowne Plaza Land within a 7m and 12m high envelope as measured from ground level as defined in the District Plan. The plans also show the relative height of those buildings in comparison to the existing buildings at 40A and 40B Man Street, including those properties' south-facing decks. Attached and marked "BAM-1" are the plans.
- Ground levels were assessed using existing credible evidence, primarily from information detailed on previous surveys undertaken by Aurum Survey Consultants and Clark Fortune McDonald & Associates (including from Diagram 8 of Appendix 4 to the District Plan). Additional measurements were taken over the last week to confirm consistency in datum and assessment. Specialist survey software (12D Solutions) was used to model ground levels and the height planes and generate the profiles.
- I note the ground levels assessed and shown on the plans will differ from the ground levels physically seen onsite. This is because the definition of "*height*" in the District Plan requires it to be measured from "*ground level*" as defined in the Plan (see pages D-6 and D-5 respectively). In summary ground level is defined to mean original ground level prior to any development on the site (my paraphrasing).
- Ground levels are expressed in terms of the Mean Sea Level Datum applicable to Queenstown.

SWORN at Queenstown

this 15th day of January 2015

before me:

) 
) **Bruce Allan McLeod**
)


K Ackroyd
Deputy Registrar
Queenstown District Court

(Deputy) Registrar / Solicitor of the High Court of New Zealand