

Before Queenstown Lakes District Council

---

In the matter of                      The Resource Management Act 1991

And                                      A requested change to the Mount Cardrona Station Special  
Zone of the Queenstown lakes District Council's Operative  
District Plan – **Plan Change 52**

---

**SUMMARY EVIDENCE OF JEFFREY BROWN FOR**

Mt Cardrona Station Limited

Dated 11 July 2017

---

**Solicitor:**

Rosie Hill  
Anderson Lloyd  
Level 2, 13 Camp Street, Queenstown 9300  
PO Box 201, Queenstown 9348  
DX Box ZP95010 Queenstown  
p + 64 3 450 0700 | f + 64 3 450 0799  
rosie.hill@al.nz

**Counsel:**

Warwick Goldsmith  
Barrister  
PO Box 213, Queenstown 9365  
m + 64 021 220 8824  
warwickgoldsmith@gmail.com

## INTRODUCTION AND QUALIFICATIONS

- 1 My full name is Jeffrey Andrew Brown.
- 2 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.
- 3 I have complied with the Code of Conduct for Expert Witnesses contained in the Environment Court Consolidated Practice Note 2014. My evidence dated 26 June 2017 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.

## SUMMARY EVIDENCE

- 4 I refer to and adopt my evidence for this hearing dated 26 June 2017 (**Evidence in Chief**) and the Assessment of Environmental Effects (**AEE**) and the section 32 evaluation, both dated 6 December 2016 in respect of requested Plan Change 52.
- 5 My Evidence in Chief details the following matters:
  - (a) An overview of the background to the Mount Cardrona Station Special Zone (MCSSZ);
  - (b) A summary of the key changes to the MCSSZ being requested through Plan Change 52;
  - (c) A comment on the higher order objectives and policies; assessment under the National Policy Statement on Urban Development Capacity 2016; and assessment under Part 2 of the Act;
  - (d) Appended copies of 'marked up' and 'clean' versions of the MCSSZ planning provisions as requested to be amended by Plan Change 52.
- 6 I am happy to answer any questions the Panel has regarding my Evidence and AEE.

**Dated this 11<sup>th</sup> day of July 2017**