

under: the Resource Management Act 1991

in the matter of: Submissions and further submissions on Queenstown
Lakes Proposed District Plan 2023

and: Urban Intensification Variation

and: **Carter Queenstown 2015 Limited (Carter Group)**
(Submitter 776 and Further Submission 1337)

and: **Centuria Property Holdco Limited (Centuria)**
(Submitter 743 and Further Submission 1362)

Summary statement of evidence of Charlotte Clouston

Dated: 1 August 2025

Reference: J M Appleyard (jo.appleyard@chapmantripp.com)
T B Parker (tallulah.parker@chapmantripp.com)

SUMMARY STATEMENT OF EVIDENCE OF CHARLOTTE CLOUSTON

- 1 My full name is Charlotte Lee Clouston.
- 2 I prepared a statement of evidence dated 4 July 2025 in support of the Submitters' requested relief.
- 3 My position as set out in my statement of evidence has not changed. I prepared my evidence on the basis that the rezoning request is within the scope of the Variation, and squarely 'on' the Variation, as addressed in legal submissions for the Submitters.
- 4 I consider that it is logical for the Plan Change 50 Land to be included within the Variation, for efficiency in the plan-making process, to give effect to the NPS-UD now and to avoid duplication of process in a potential future stage of the PDP review. There is no certainty regarding if and/or when the PC50 Land may otherwise be incorporated into the PDP.
- 5 My statement of evidence focused on four key points of contention.
- 6 Firstly, the incorporation of the PC50 Land into the PDP and the Variation. In summary:
 - 6.1 The existing ODP zoning was made operative through Plan Change 50 in 2016. The operative zoning and associated standards for height and density predate the NPS-UD.
 - 6.2 My view is that the logical zoning for the PC50 Land in the PDP is Queenstown Town Centre.
 - 6.3 Currently the ODP and PDP provisions and mapping collectively determine the geographic extent of the Queenstown Town Centre.
 - 6.4 There is no reason to separate the PC50 Land from the PDP zoned Queenstown Town Centre extent when considering the intention and national direction in the NPS-UD, particularly Policy 5.
 - 6.5 Incorporating the PC50 Land into the PDP as Queenstown Town Centre zone is more appropriate than retaining the ODP zoning that was considered prior to the NPS-UD.
- 7 Secondly, my evidence assessed the appropriate height precinct classification for the PC50 Land, including Centuria Land and the Carter Group Land.
 - 7.1 The urban design evidence of Mr Compton-Moen considers that bringing the PC50 sites up to 24m height limit, with an upper floor setback, would allow for greater intensification without creating adverse effects on adjoining properties.

- 7.2 The location of the Carter Group Land and Centuria Land contribute to the amphitheatre approach to height precincts within the Queenstown Town Centre zone, particularly with the Carter Group Land forming a western edge of the amphitheatre type configuration.
- 7.3 I consider that proposed Height Precinct 4, with standard 12.5.9 setting a maximum height of 24m, is the most appropriate height precinct for the Carter Group Land and the Centuria Land.
- 7.4 Replacement of the ODP rules with a simplified PDP height precinct will enable more efficient plan administration and increase ease of plan interpretation.
- 8 Thirdly, I considered the height precinct classification for the land legally described as Section 2 Block XVII Town of Queenstown.
 - 8.1 Ms Frischneckt recommended a new height Precinct 6 in the section 42A recommended position, with a height limit of 8m.
 - 8.2 I consider that a 4m height limit is more appropriate for this land, given the site is public space and designated for a recreation reserve.
- 9 Finally, I considered the height precinct classification for Steamer Wharf, in light of submission OS995.
 - 9.1 Kopuwai Investments Limited sought a permitted height standard of 11m at 88 Beach Street, Steamer Wharf.
 - 9.2 My position is that the 8m height limit proposed in the Variation as notified would be more appropriate, to avoid potential adverse dominance on the lake edge and contribute to the amphitheatre approach to height.
- 10 My evidence also considered the further submissions made by Carter Group and Centuria. My position on these further submission points as set out in my statement of evidence has not changed.
- 11 Overall, I consider that the failure to include PC50 Land in the Variation means that the Variation has not fully given effect to the direction of Policy 5 for district plans to provide for increased heights and density of urban form in urban environments based on accessibility and demand.

Dated: 1 August 2025

Charlotte Clouston