

Before an Independent Hearings Panel
Appointed by Queenstown Lakes District Council

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: **MacFarlane Investments Limited and J L
Thompson (MIL)**
(Submitter 767)

Memorandum of Charlotte Clouston

Dated: 1 September 2025

MEMORANDUM 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 MIL requested relief.
- 3 I presented at the hearing on Friday 8 August 2025.
- 4 I have prepared this memorandum in conjunction with a formal response for Carter Group (Submitter 776) and Centuria Property (Submitter 743). These memoranda can be read together.

The Land

- 5 The PC50 land is located to the north and west of the current town centre. It generally contains two blocks of land. First, an 'L-shaped' block of land that contains the Isle Street East and Isle Street West sub-zones, together with the block of land containing the Crowne Plaza Hotel (not described as a sub-zone) which is the focus of the Carter Queenstown submission.
- 6 The MIL land is wholly contained within the area described in the ODP as the Queenstown Town Centre Zone, Isle Street East Sub-Zone.
- 7 The second block of land is referred to as the Lakeview sub-zone which is located in between the 'L-shaped' block described above and below the slopes of Bob's Peak. The Lakeview sub-zone is separately identified at Figures 2 and 3 of the ODP Town Centre chapter on a Structure Plan and Height Limit Plan respectively.
- 8 The ODP was changed as a result of Plan Change 50, which resulted in additional objectives, policies, rules and in some cases exceptions to rules.

ODP to PDP Integration

- 9 This supplementary memo addresses two scenarios I understand the Panel is interested in:
 - 9.1 Whether there is any plan-administration risk of applying UIV provisions to PC50 land (either all the PC50 land or alternatively the 'L-shaped block'; or
 - 9.2 Whether there are any issues, including in terms of scope, in simply including some or all of the PC50 land in the PDP completely – so that both the UIV provisions would apply, but also the remainder of the PDP provisions, and ODP provision cease to apply.
- 10 The Panel also sought an assessment of any unintended consequences of making such changes.

Full ODP to PDP integration option

- 11 I have assessed the ODP and PDP provisions and provided my working document in Annexure 1 of the formal response for Carter Group and Centuria Property dated 22 August 2025. For brevity, I do not repeat that assessment in this memo.

- 12 My view is that the PDP provisions in Chapter 12 are appropriate on their merits for application to all of the PC50 land, including the MIL land.
- 13 In my opinion the incorporation and application of the PDP Town Centre Zone provisions will be most efficient.
- 14 Given the specific provisions for the Lakeview sub-zone in the ODP, including a structure plan, height plan and several site-specific rules, I consider that the Panel could review the Lakeview area separately. Reviewing these separately would not pose any issues for the incorporation of the MIL Land and Isle Street sub-zones into the PDP through the Variation.
- 15 The location specific provisions for the Isle Street East sub-zone in the ODP are summarised in the table below.

Isle Street East sub-zone

ODP Rule	PDP Comment
10.6.3.2 Controlled Activities	
i. Building Two additional matters of control	The consent status is Restricted Discretionary for buildings
iv. Visitor Accommodation Five additional matters of control	The consent status is Controlled for Visitor Accommodation
10.6.3.2A Restricted Discretionary Activities	
v. Buildings Specific rule for where any building does not comply with a site standard.	The consent status is Restricted Discretionary for Buildings
10.6.3.4 Non-Complying Activities	
vii. Retail activities that exceed 400m ² per tenancy	No restriction on retail footprint
10.6.5.1 Site Standards	
i. (e) Building Coverage – maximum of 80%	No maximum coverage
iv. Street Scene Two matters relating to setbacks	No minimum or maximum setbacks
vii. Residential Activities e. Residential activity must achieve minimum insulation and ventilation requirements	No ground floor residential activity on Brecon Street, otherwise no restriction. All buildings to meet acoustic insulation standard.
xi. Building and Façade Height e. Maximum height of 12m (i) and (ii) 15.5m for sites greater than 2,000m ² in area and with frontage to either Man Street and Isle Street g. 2m roof bonus (12m+2m) j. Height in relation to boundary setback of residential activities pre-2014	Not located within a Height Precinct in the PDP.
xv. Premises Licensed for Sale of Liquor Noise Limits	Chapters 12 and 36 – Noise applies
xvi. Visitor Accommodation Noise Limits	Chapters 12 and 36 – Noise applies

- 16 There are some changes between the ODP and PDP in terms of activity status and applicable standards i.e. the activity status for buildings is controlled in the ODP and restricted discretionary in the PDP. There are slightly different rules for verandas, building coverage, noise, motor vehicle repairs and factory farming activities as examples.
- 17 From a planning perspective, I think these changes are manageable and incorporation into the PDP would not pose any planning issues, instead applying a consistent approach to land use and management of effects in the town centre zone.

Hybrid ODP / PDP Approach

- 18 The alternative to applying the PDP provisions in their entirety would be for a hybrid approach.
- 19 Ms Baker-Galloway considered at the hearing that a hybrid ODP / PDP planning regime may be appropriate to give effect to the Variation. I note that currently Strategic Chapters 3 – 6 of the PDP apply to zones still within the ODP including PC50 land, so in that sense there is already a hybrid ODP/PDP in application.
- 20 This hybrid approach may be applicable to the Isle Street East block as the block contains the heritage listed Glenarm Cottage at the corner of Man and Camp Streets. That heritage listing has not been incorporated into the PDP, and continues under Chapter 13 of the ODP.
- 21 If the Panel is of the view that a hybrid approach is preferable to full PDP integration, I consider the PC50 Land (including the blocks of land containing MIL Land, Carter Group Land and Centuria Land), can be included in the Height Precinct Map and applicable Rules of the Variation i.e. 12.5.8 – 12.5.12.
- 22 A planning control layer can be added to the web mapping application/ePlan that notes this land area is subject to the rules proposed in the Variation. Suggested drafting in the ePlan could look like:
 - 22.1 A mapped overlay/control line around the PC50 Land including the MIL Land;
 - 22.2 Text stating: This area is subject to Rules 12.5.8 – 12.5.12. This area is also subject to Objective 12.2.2 and associated policies.
 - 22.3 The inclusion of the PC50 Land within Height Precinct 4, with a maximum 24m height, in Figure 2: Queenstown Town Centre Height Precinct Map.
 - 22.4 An advice note in the overlay/control description that states that the ODP zoning and district-wide provisions apply to matters outside of Rules 12.5.8 – 12.5.12 and Chapters 3 – 6 of the PDP.
- 23 Effectively, this would apply the proposed provisions of the Variation to the PC50 Land/MIL Land, as a discrete set of provisions that implement the NPS-UD. The related provisions in the ODP on the same matters i.e. 10.6.5.1.xi would fall away.

- 24 A hybrid approach is not my preference as I consider it will add a layer of uncertainty to plan administration, in that plan users have two sets of town centre zone provisions to reference.
- 25 The ODP mapping of the Isle Street East sub-zone includes heritage item 68, Glenarm Cottage, at 50 Camp Street. This is a listed QLDC category 2 building in the ODP.
- 26 In my view, this mapped feature can be incorporated into the PDP Heritage Schedule as a consequential change and subject to the PDP rules for historic heritage / category 2 heritage features. Resource consent is required under the PDP for development, including earthworks, in proximity to the heritage feature. I consider this appropriate provision and no bespoke provisions required for the Glenarm Cottage.
- 27 If the Panel is of the view that this feature requires additional assessment, rather than incorporation into the PDP, then I consider that the piece of land on which the heritage item is located can be excluded from the relief sought. This would not affect the relief sought for the remainder of the block of land, including the MIL Land.
- 28 I have previously provided section 32AA analysis in my statement of evidence.

Dated: 1 September 2025

Charlotte Clouston