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: Queenstown Gold Limited (QGL)

(Submitter 765)

Summary statement of evidence of Charlotte Clouston

Dated: 7 August 2025

SUMMARY STATEMENT OF EVIDENCE OF CHARLOTTE CLOUSTON

- 1 My full name is Charlotte Lee Clouston.
- I prepared a statement of evidence dated 4 July 2025 in support of the Submitter's requested relief. My evidence focused on the requested reclassification of the height precinct for 27 Brecon Street (QGL Land) and adjacent land, from Height Precinct 5 to Height Precinct 4.
- 3 My position as set out in my statement of evidence has not changed.
- 4 The section 42A reporting did not provide any consideration of the location specific request for the QGL Land and adjoining sites. Mr Wallace's rebuttal evidence is silent on the relief sought.
- 5 I have reviewed the rebuttal evidence prepared by Ms Frischneckt in relation to my evidence.
- 6 Ms Frischneckt has incorrectly stated at paragraph [4.9] that the block of land including the QGL Land is not within Height Precinct 4 and is within the area of land known as Lakeview that is yet to be reviewed through the District Plan review, therefore not within the scope of the UIV.
- 7 The QGL Land is zoned Queenstown Town Centre in the PDP, and is not part of the PC50 Land. The QGL Land is subject to the Variation, with the notified Height Precinct Map showing the QGL Land and surrounding properties as Height Precinct 5. The QGL Land is therefore clearly within the scope of the Variation.
- 8 The notified height precinct classification for the QGL Land as Height Precinct 5 provides for a 16m maximum height.
- 9 Mr Compton-Moen provided urban design evidence that supports an increase of height at the site to 24m is appropriate. This approach is consistent with other blocks surrounding the edge of the Town Centre.
- 10 My statement of evidence focused on the following points in support of the proposed reclassification, based on accessibility and the receiving environment.

Accessibility

- 11 The Queenstown Town Centre was identified in the section 32 reporting as having the highest level of accessibility across the District.
- 12 Upper Brecon Street has recently been upgraded as part of the QLDC Major Projects 'Queenstown Town Centre Street Upgrades'. The upgrades feature improved walking and cycling facilities between Beach Street and upper Brecon Street, providing a continuous link from the Queenstown Gardens to the Skyline Gondola.
- 13 Investment in significant active transport infrastructure signals an anticipated increase in accessibility through the 'Gardens to Gondola' corridor going forward.
- 14 The proposed greater height is commensurate with the high accessibility for the Queenstown Town Centre Zone.

Receiving Environment

- 15 Consented activities within the vicinity of the QGL Land provide for increased height, with the maximum height of the recently constructed Skyline carpark building at 24.1m. Opposite the QGL Land, at 34 Brecon Street, a 23m high hotel development was previously approved.
- 16 The receiving environment is appropriate for absorbing additional height, forming the upper end of the "amphitheatre" of the Queenstown Town Centre Zone.
- 17 The existing land use of the QGL Land and adjacent properties identified in the submission comprises large commercial buildings. Enabling greater building height will enable efficient use and development of this land, consistent with the intended form and function of the Queenstown Town Centre Zone.

Summary of Position

- 18 I support the inclusion of setback controls at upper levels.
- 19 I support the reclassification of the block of Queenstown Town Centre Zone land that includes the QGL Land and adjoining properties to Height Precinct 4.
- 20 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 QGL Land and surrounding properties.
- 21 Increased height for the QGL Land is consistent with the strategic provisions of the PDP, as well as Policy 5 and Objective 3 of the NPS-UD.
- Overall, I consider that reclassification of the QGL Land and surrounding properties to Height Precinct 4 will better give effect to the direction of Policy 5 of the NPS-UD.

Dated: 7 August 2025

Charlotte Clouston