

**BEFORE THE INDEPENDENT HEARING PANEL  
FOR THE QUEENSTOWN LAKES PROPOSED DISTRICT PLAN**

<b>Under the</b>	Resource Management Act 1991
<b>In the matter</b>	of the Urban Intensification Variation to the proposed Queenstown Lakes District Plan

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**REBUTTAL EVIDENCE OF CORINNE FRISCHKNECHT  
ON BEHALF OF QUEENSTOWN LAKES DISTRICT COUNCIL**

**REZONING REQUESTS FOR BUSINESS ZONES**

**24 July 2025**

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## **1. QUALIFICATIONS AND EXPERIENCE**

- 1.1** My full name is Corinne Frischknecht. I hold the position of Senior Policy Planner at Queenstown Lakes District Council (**Council** or **QLDC**). I have been in this position since February 2024.
- 1.2** I prepared the Section 42A Report on rezoning: Business and Lake Hāwea Zones dated 6 June 2025 (**s42A Report**) on the Urban Intensification Variation (**UIV** or **Variation**).
- 1.3** My qualifications and experience are set out in my s42A Report at paragraphs 1.1 to 1.4.
- 1.4** Although this is a Council hearing, I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and that I agree to comply with it. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise, except where I state that I am relying on the evidence of another person. The Council, as my employer, has authorised me to give this evidence on its behalf.

## **2. SCOPE OF REBUTTAL EVIDENCE**

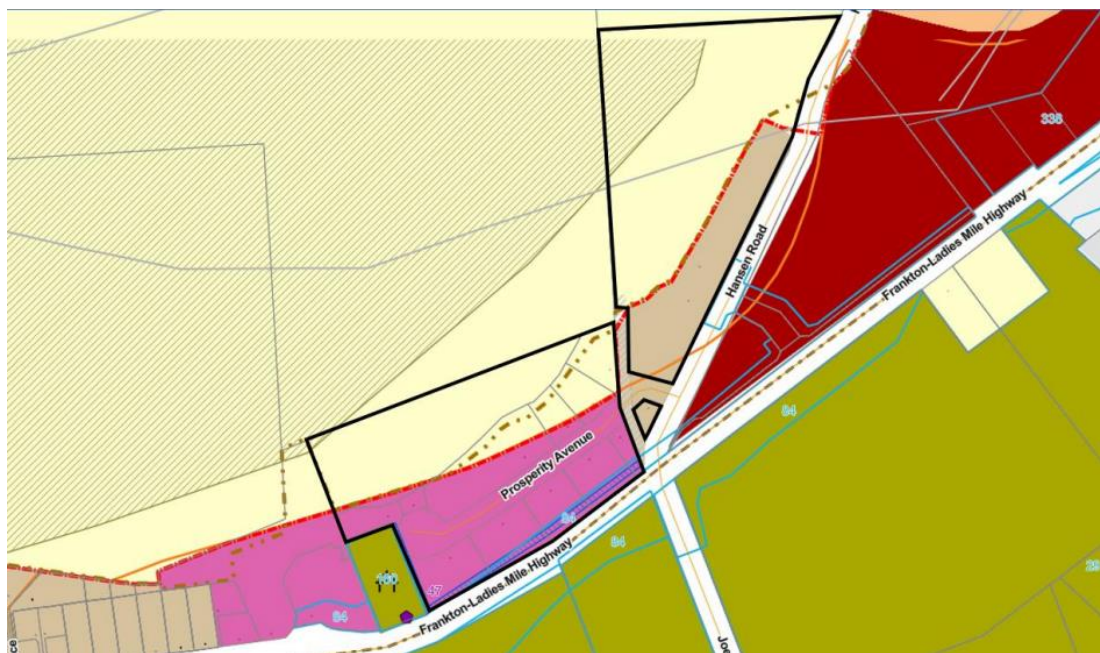
- 2.1** My Rebuttal Evidence is provided in response to the following evidence filed on behalf of various submitters:
- (a) Charlotte Clouston for City Impact Church Queenstown Incorporated (775) and No. 1 Hansen Road Limited (766); and
  - (b) Garth Falconer for City Impact Church Queenstown Incorporated (775) and No. 1 Hansen Road Limited (766) (as far as this evidence raises planning issues).
- 2.2** Where I do not respond to a particular evidence statement, or general theme, this does not mean I have not considered the subject matter, but that I have nothing further to add and my views remain as expressed in my S42A Report.

**2.3** The “Rebuttal Recommended Provisions”, as recommended across Council’s rebuttal, is included at Appendix A to Ms Bowbyes’ Rebuttal Evidence.

**3. CITY IMPACT CHURCH QUEENSTOWN INCORPORATED (775) AND NO. 1 HANSEN ROAD LIMITED (766)**

**3.1** The Submitters’ land is located in Frankton. 1 Hansen Road adjoins State Highway 6. 3 Hansen Road is set back from the State Highway. Both sites include land within the Queenstown Hill / Te Tapanui Outstanding Natural Landscape (**ONL**) overlay.

**3.2** The following figure is an extract from Ms Clouston’s evidence, showing the two sites (outlined in black) where a rezoning to BMUZ is supported.



*Figure 1: Extract from Ms Clouston’s evidence*

**3.3** I note that the map shown above differs to the maps shown in the original submissions, for both 1 Hansen Road and 3 Hansen Road. The maps in the original submissions did not include the Rural Zoned land within the ONL nor outside of the Outer Control Boundary (**OCB**). Legal submissions for Council will address whether rezoning of rural land, is within the scope of the UIV, and if necessary

whether the position supported by Ms Clouston is even within the scope of the submission filed.

**3.4** In paragraph 52 of her evidence, Ms Clouston notes that “[t]he rural portion is similar in character and landscape values to the area of the site currently zoned LDSR and I consider it appropriate to adjust the Urban Growth Boundary to reflect the developable area of the site.” She also noted that “This is not practical, nor does it reflect a delineation in section 6(b) landscape values and character on the ground”.

**3.5** Ms Clouston’s evidence relies on Mr Falconer’s evidence in regard to landscape. In his evidence, Mr Falconer appears to rely on previous Landscape Visual Assessments (**LVA**), as outlined in paragraphs 34 and 35 of his evidence. These LVAs were prepared for specific resource consent proposals (including under different legislation), rather than for a height increase for the entire site, and therefore in my view has limited relevance to this hearing and the decision.

**3.6** I am not compelled to change my recommendation based on Ms Clouston’s evidence (as far as it is supporting relief that is ‘on’ the UIV) for the following reasons:

- (a) In paragraph 36 of her evidence, Ms Clouston notes that “[r]ezoning of these two sites is not likely to undermine the function of either the Frankton LSCZ or Five Mile / Queenstown Central or Frankton North” however no economic assessment has been provided to support this statement;
- (b) At paragraph 76 of her evidence, Ms Clouston states that “[t]he transport environment of the site has changed with the NZUP upgrades and realignment of the State Highway, such that the site has increased accessibility.” No further evidence or reasoning has been provided, or comment from NZTA; and
- (c) The consented baseline demonstrates that the site already has development opportunity through these existing consents, and that there is a consenting pathway for any future activities/built form variations for the site.

**3.7** For the reasons set out above, and in Sections 5 and 6 of my S42A Report, I stand by my original view and do not recommend any changes to the zoning in respect of the sites at 1 and 3 Hansen Road.

A handwritten signature in black ink, appearing to be 'CF', followed by a horizontal line.

**Corinne Frischknecht**

**24 July 2025**