

*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)

Summary statement of evidence of Charlotte Clouston

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Dated: 8 August 2025

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## **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 Submitter's 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 two 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 the MIL 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 MIL Land and the landholdings within the same block is appropriate to absorb additional height and contributes to the northern edge of the "amphitheatre" height configuration of the Town Centre. The MIL Land

is of similar topography to the land directly south, which is proposed for Height Precinct 4.

- 7.3 The demand and accessibility assessment undertaken in the section 32 reporting included PC50 and indicated that higher levels of intensification on the edges of the town centre are likely to be suitable, pursuant to Policy 5 of the NPS-UD.
- 7.4 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 MIL Land.
- 7.5 Replacement of the ODP rules with a simplified PDP height precinct will enable more efficient plan administration and increase ease of plan interpretation. I see no need to roll over a bespoke provision from the ODP to PDP for the Isle street sub-zone (East) including the MIL Land, enabling additional heights on sites greater than 2,000m<sup>2</sup>.
- 8 My evidence also considered the further submissions made by MIL. My position on these further submission points as set out in my statement of evidence has not changed.
- 9 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: 8 August 2025

**Charlotte Clouston**