

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: **Continuum Hotel Limited (Continuum)**
(Submitter 771)

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.
- 2 I prepared a statement of evidence dated 4 July 2025 in support of the Submitter's requested relief.
- 3 The Continuum Land located at 2 and 22 Earl Street is currently operated as the Novotel Hotel.
- 4 My evidence focused on the requested reclassification of the height precinct proposed in the Variation for the Continuum Land, from Height Precinct 3 to Height Precinct 4.
- 5 My position as set out in my statement of evidence has not changed.
- 6 My position is informed by the urban design evidence provided by Mr Compton-Moen for the submitter. Mr Compton-Moen supports an increase of height at the site to 24m, in the context of the increased height in the surrounding Town Centre Zone land.
- 7 The Continuum Land is surrounded by 20m wide road reserves on the northern, western and southern boundaries. The Queenstown Gardens Recreation Reserve adjoins the full length of the eastern boundary and provides separation between the nearest built form.
- 8 There is vertical separation between the nearby properties on Coronation Drive and Park Street, as well as mature vegetation in the Queenstown Gardens Recreation Reserve.
- 9 My view is that the reclassification of the Continuum Land to Height Precinct 4, with standard 12.5.9 setting a maximum height limit of 24m, would provide an additional edge to the "amphitheatre" approach and be the most appropriate height precinct for the Continuum Land.
- 10 I support the inclusion of setback controls for upper levels of the permitted height.
- 11 The greater height provided in Height Precinct 4 is commensurate with the highest level of accessibility, being the Queenstown Town Centre Zone.
- 12 Ms Frischneckt and Mr Wallace both support the requested reclassification of the Continuum Land in their rebuttal evidence.
- 13 Increased height for the Continuum Land is consistent with the strategic provisions of the PDP, as well as Policy 5 and Objective 3 of the NPS-UD.

Dated: 7 August 2025

Charlotte Clouston