

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: **Carter Queenstown 2015 Limited (Carter Group)**
(Submitter 776 and Further Submission 1337)

and: **Centuria Property Holdco Limited (Centuria)**
(Submitter 743 and Further Submission 1362)

Statement of evidence of Dave Compton-Moen

Dated: 4 July 2025

Reference: J M Appleyard (jo.appleyard@chapmantripp.com)
T B Parker (tallulah.parker@chapmantripp.com)

STATEMENT OF EVIDENCE OF DAVE COMPTON-MOEN

INTRODUCTION

- 1 My name is David John Compton-Moen.
- 2 I hold the qualifications of a Master of Urban Design (Hons) from the University of Auckland, a Bachelor of Landscape Architecture (Hons) and a Bachelor of Resource Studies (Planning and Economics), both obtained from Lincoln University. I have been a Registered Landscape Architect of the New Zealand Institute of Landscape Architects ('NZILA') since 2001, a full member of the New Zealand Planning Institute, since 2007, and a member of the Urban Design Forum since 2012.
- 3 I am a Director at DCM Urban Design Limited, which is a private independent consultancy that provides Landscape and Urban Design services related advice to local authorities and private clients, established in 2016.
- 4 I have worked in the landscape assessment and design, urban design, and planning fields for approximately 25 years, here in New Zealand and in Hong Kong. During this time, I have worked for both local authorities and private consultancies, providing expert evidence for urban design, landscape and visual impact assessments on a wide range of major infrastructure and development proposals, including the following relevant projects:
 - 4.1 2024 – Queenstown Hotel Fast Track Application. I was involved in expert conferencing on behalf of an affected party assessing the urban design effects of a proposed hotel on Man St above the existing Man St Carpark. The building sought relief for setbacks, building height and the location of View shaft.
 - 4.2 2019-2021 - Proposed District Plan Design Guides – Residential (High, Medium and Lower Density and Business Mixed Use Zones. Working with QLDC staff and Vivian Espie, I was tasked with preparing Design Guides for Residential and Business Mixed Use Zones.
 - 4.3 2022- current – Te Pa Tahuna Super Lot 01. I have been working with Mike Greer Commercial and Ngai Tahu on the development of 3 apartment buildings on the old school site.
 - 4.4 2015-2020 Future Plan – Intensification of Residential Areas, Medium Density Design Guide and Plan Change 43, Hutt City Council. I worked with Council staff to develop provisions and design guides for intensification of Residential and Suburban Commercial centres in Hutt City.

- 4.5 2020 – Working with Hastings District Council and Stantec, a design guide was prepared for Intensification of Residential Areas within Hastings District.
- 4.6 2024 – Working for Carter Group to provide Urban Design and Landscape advice for Environment Court mediation for West Rolleston (previously PC73, 81 and 82) which includes provision for approximately 3,500 new dwellings and 4 commercial centres of varying sizes. Each centre was modelled to test how each one could be developed to provide for future residents' day-to-day needs.
- 4.7 2020- current – Working for Mike Greer Homes, I have worked on the master planning, urban design and landscape design for several Medium Density Residential and Mixed-Use Developments: Madras Square (+90 homes); 476 Madras Street (98 homes); 258 Armagh Street (33 homes); and 33 Harewood Road (31-homes).
- 4.8 2017-current - Acland Park, Rolleston – master planning and landscape design for a 1,000-lot development in Rolleston. This development is almost completely built out with only the small commercial centre to be built.
- 4.9 2022- current - Harrow Green, Rolleston – provision of urban design advice for a residential development for 266 dwellings against the proposed MDRS rules. Our office is currently working on the landscape design of this subdivision.
- 5 I am familiar with Carter Group's and Centuria's submission on the Queenstown Lakes Proposed District Plan 2023 – Proposed Urban Intensification Variation (the *Variation*) to the Queenstown Lakes Proposed District Plan (*PDP*), Carter Groups interests in the block of land bound by Man Street, Lake Street, Hay Street and Beach Street (*Carter Group Land*) and Centuria's interests in the property at 17-19 Man Street, Queenstown (*Centuria Land*).

CODE OF CONDUCT

- 6 Although this is not an Environment Court hearing, I note that in preparing my evidence I have read the Environment Court's Code of Conduct for Expert Witnesses in its Environment Court Practice Note 2023 and I agree to comply with it. My qualifications as an expert are set out above. I confirm that the issues addressed in this brief of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

SCOPE OF EVIDENCE

- 7 The purpose of my evidence is to set out my involvement in the preparation of evidence to support these rezoning requests. My evidence should be read in conjunction with the Graphic Attachment appended.
- 8 My evidence will deal with the following:
 - 8.1 Methodology for Modelling and Proposed Submission Heights;
 - 8.2 Anticipated, including Consented, Receiving Environment;
 - 8.3 Extent of Town Centre based on Built Form;
 - 8.4 Building Setback for Upper Floors and Shading Issues;
 - 8.5 Built Form and Amphitheatre around the Waterfront;
 - 8.6 Building Dominance from Increasing the Height of the Crowne Plaza Site and Centuria Site; and
 - 8.7 High limit for Section 2 Block XVII Town of Queenstown.
- 9 In preparing my evidence, I have reviewed:
 - 9.1 The UIV Section 42A (Town Centres and Business Zones) report prepared by Corinne Frischknecht, 6 June 2025;
 - 9.2 UIV Statement of Evidence (Urban Design) by Cam Wallace, 6 June 2025; and
 - 9.3 Strategic Evidence Appendix 2 – Summary of submissions and decisions.

METHODOLOGY FOR MODELLING

- 10 To assist with determining and testing effects of the proposed submissions, our office has imported LIDAR information, including current buildings and vegetation in Sketchup. We have then overlaid the proposed 'Bulk Forms' proposed under the UIV, including the increased height at 12-26 Man St over the carpark, to gain a better understanding of the spatial implications of the proposed increases.

- 11 We have also modelled several Submission proposals which seek greater Intensification and Consented developments including the following (refer to Figures 1 and 3 in the Graphic Attachment):
 - 11.1 Crowne Plaza seeking 24m from the current ODP limit of 7m;
 - 11.2 Centuria Site seeking 24m from a currently consented 18m;
 - 11.3 Novotel Hotel seeking 24m from the proposed UIA limit of 20m;
 - 11.4 30 Man St seeking 24m from the current ODP limit of 12+2m;
 - 11.5 34 Brecon Street is consented to be 23m; and
 - 11.6 12-26 Man St is consented to be 23.78m above the carpark (refer to Figure 2 in the Graphic Attachment).
- 12 A series of images have been prepared from an elevated location above the lake and then from water level. The intention of this is to highlight the 'amphitheatre' nature of the town centre and how buildings typically step-up the slopes around the Lakefront (refer to Figures 5-12 in the Graphic Attachment).
- 13 A photo-illustration has been created for the proposed view looking back at the site from Lake Esplanade.

ANTICIPATED, INCLUDING CONSENTED, RECEIVING ENVIRONMENT

- 14 From looking at a combination of the UIV provisions and the consented receiving environment there is significant development occurring on the uphill side of Man Street and along Brecon Street where the current height limits are breached. This includes the following consented developments (refer to figure 1 of the Graphic Attachment):
 - 14.1 Lakeview with buildings up to 42m;
 - 14.2 34 Brecon Street at 23m;
 - 14.3 Centuria Hotel (17-19 Man St) at 18m; and
 - 14.4 21-23 Man St at 15.5m.
- 15 Immediately to the west of the Crowne Plaza 'Block', bordered by Lake, Man, Brunswick Streets and Lake Esplanade, the High Density zone has a maximum height limit of 16.5m.

- 16 When combined with the UIV heights, the Crowne Plaza and remaining PC50 sites are noticeable for their lack of potential built form. From a built form perspective bringing these sites up to 24m in height, with an Upper Floor setback, would allow for greater Intensification without creating adverse effects on adjoining properties. It would also recognise the consented developments which already exceed the current height standards.

EXTENT OF TOWN CENTRE BASED ON BUILT FORM

- 17 For the most part the Extent of the Town Centre covered by the UIV makes sense spatially, either defined by major roads or topography in the case of the Novotel site (refer to Figure 4 of the Graphic Attachment). However, the exclusion of the PC50 area including the Carter Group Land and Centuria Land makes no sense in spatial terms. The blocks within this area are well-connected and highly accessible. For the most part they are developing into areas characterised by commercial and visitor accommodation as opposed to individual residential houses, which used to cover the majority of the area.
- 18 The area north of Man St, including the Lake View development, is quickly transitioning from pure residential to being similar in character to the Town Centre. It is physically constrained to the northwest by topography and by Open Space and High Density Residential to the northeast
- 19 The Crowne Plaza 'Block', noting it hosts 4 individual dwellings, already has a 'Town Centre character' with the hotel being commercial and a notable building in Queenstown Town Centre's built character. The hotel's foyer and 'front of house' open directly out onto Lake Esplanade and the Steamer Wharf. In PC50, the site was described as the Lake Street Block, which was reported as:¹

"The proposed block of land bounded by Lake Street and Hay Street is proposed to be rezoned to Queenstown Town Centre zone. The provisions of the current Queenstown Town Centre zone will therefore apply at the site, with the exception of the noise limits and the maximum building height limits. The maximum height limit rule and noise limit rules that apply to these sites currently (from the High Density Residential zone) will be retained."

- 20 The Centuria Site is located on the corner of Man and Brecon Streets, being 17-19 Man Street, immediately across the road from the Brecon Road steps which descend directly into the town centre proper. Commercial activities extend all the way along Brecon Street to the north up the Skyline gondola terminal, noting that the block bounded by Brecon and Isle Street has been included in the

¹ [Appendix F: Example of Information Sheet received by Key Stakeholders and Neighbours to the Site](#) at 4.

UIV Town Centre. The site is part of the Isle Street Sub-zone, which was described in PC50 as:²

"Two blocks immediately adjacent to the current zone boundary and situated between the Queenstown Town Centre Zone and the Commercial overlay area on Brecon Street have been identified as suitable for the expansion of the Queenstown Town Centre Zone. Activities envisaged for this area would see the continuation of visitor accommodation, small scale commercial / administration and retail activities and residential uses.

For these two blocks, a commercial mixed-use environment is sought for this area. In order to provide for this mixed use environment, we propose to include a new sub-zone in the District Plan. This sub-zone, to be called the Isle Street sub-zone will involve a new policy and new rules in the District Plan to manage the scale of buildings, promote an interesting pedestrian environment and limit retail activities in order to avoid large format retail from establishing here."

- 21 In general, PC50's intention was to increase development potential. The information sheet states that:³

"While these initiatives involve rezoning land from High Density Residential to a Town Centre zoning, the proposed plan change will allow for greater development rights as well as providing for residential land use. Therefore potential residential development yield from the land will not be diminished, and may in fact be increased."

- 22 I consider that these areas along with the Lake View site should be incorporated into the Town Centre extent recognising the current and future built form of this area, noting that the intention of PC50 was to extend the Town Centre zone to incorporate this land.

BUILT FORM AND AMPHITHEATRE AROUND THE WATERFRONT

- 23 When viewing the existing contours and built form around the lakefront, there is a notable terracing of development up the hill to create an 'amphitheatre' like appearance, and buildings stepping down to the Lakefront. The proposed increase of development potential at 12-26 Man Street 'breaks' this rule with the southern side of the proposed building sitting well above and extending forward of the sites to either side.
- 24 To continue this 'amphitheatre' like character, increasing the development height on the northside of Man St (including the

² [Appendix F: Example of Information Sheet received by Key Stakeholders and Neighbours to the Site](#) at 3 - 4.

³ [Appendix F: Example of Information Sheet received by Key Stakeholders and Neighbours to the Site](#) at 4.

Centuria Site) to 24m would make sense and allow the top floors to be seen above the proposed Queenstown Hotel.

- 25 The increased height on the Crowne Plaza site would create a western edge to the town centre, wrapping around existing commercial development on the lake front.

BUILDING SETBACKS AT UPPER FLOORS AND SHADING ISSUES

- 26 The proposed upper floor building setbacks of 3m for buildings between 12m and 16m and 6m setback above 16m on road frontages is considered a positive design aspect as it will assist with bringing sunlight into public spaces and streets. The setback ensures that steep vertical walls do not occur immediately on the street edge, which would potentially cause sunlight and visual dominance issues.
- 27 The implementation of this setback on the Crowne Plaza and the Centuria site / Isle Street Sub-zone would ensure that any potential shading issues on the residential properties on Lake Street or on Man Street would be mitigated.

BUILDING DOMINANCE FROM INCREASING THE HEIGHT OF THE CROWNE PLAZA SITE AND CENTURIA SITE

- 28 The current height limit for the Crowne Plaza site is defined by a diagram in the ODP which includes spot heights and roughly follows the form of the existing hotel building. The existing building has the appearance of a six storey building when viewed from Lake Esplanade but its actual height reduces as it steps back from the lake front. At the rear of the building it is possible to drive up to the top floor from Lake Street.
- 29 The proposed 24m would allow for a more uniform height to be achieved across the site, and any future building to follow the original contours of the site stepping back from the lake front. The increase in height would be consistent with adjoining blocks in the Town Centre, and with the implementation of the Upper Floor setback concerns over building dominance and shading for the High Density zone to the immediate west can be mitigated.
- 30 Increasing the block's potential height will also be consistent with the increased height that has been given to the properties on the western side of Lake Street with its upzoning to 16.5m, following the existing ground profile. Leaving the block with its current development limitations would result in the site being under-developed and inconsistent with the UIV to increase intensification.

- 31 For the Centuria Site / Isle Street Sub-zone, increasing the height in this location will bring the sites 'in-line' or consistent with the buildings on the southern side of Man Street. At present the 12m +2m for roof form height limit is significantly lower than the southern side of Man Street where the height limit under the UIV is proposed to be 20m. This is clearly evident in the cross section prepared (refer to Figure 2 in the Graphic Attachment) which shows the height imbalance and how the Fast-track proposal breaches both the height and setback requirements.
- 32 The consented building at 17-19 Man Street would be dwarfed by the proposal.

HIGH LIMIT FOR SECTION 2 BLOCK XVII TOWN OF QUEENSTOWN

- 33 Carter Group opposes the lack of a clearly defined height limit for the part of the land zoned QTCZ and legally described as Section 2 Block XVII Town of Queenstown and requests that this area be subject to a height limit of 4 metres.
- 34 I consider limiting the height to 4m on this piece of lakefront land appropriate, given it is 'public space' for recreation purposes. For the majority of the lakefront, with the exception of Steamer Wharf, public views and access are possible across the site to the water. Allowing buildings up to 8m in height would 'privatise' this land and change the open character of this stretch of road adversely. I disagree with the statement by Mr Wallace⁴ and consider this section of the waterfront should align with Earnslaw Park, a public open space which is not part of the UIV maps marked for greater intensification. It is not appropriate to treat this section the same as the Steamer Wharf land, as it is a public recreation reserve.

CONCLUSIONS

- 35 In reviewing the proposed UIV provisions and modelling of the Town Centre, I am of the opinion that:
- 35.1 the PC50 area and the Lake View site (including Crowne Plaza 'Block' and Centuria Site) should be incorporated into the Town Centre extent recognising the current and future built form of this area;
- 35.2 the implementation of this setback on the Crowne Plaza site would ensure that any potential shading issues on the residential properties on Lake Street would be mitigated; and

⁴ Paragraph 13.10, iv-statement-of-evidence-urban-design-cam-wallace-662025-4248782

35.3 Increasing the height limit will provide additional capacity for intensification.

Dated: 4 July 2025

Dave Compton-Moen

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: **Carter Queenstown 2015 Limited (Carter Group)**
(Submitter 776 and Further Submission 1337)

and: **Centuria Property Holdco Limited (Centuria)**
(Submitter 743 and Further Submission 1362)

Statement of evidence of Charlotte Clouston

Dated: 4 July 2025

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STATEMENT OF EVIDENCE OF CHARLOTTE CLOUSTON

INTRODUCTION

- 1 My full name is Charlotte Lee Clouston.
- 2 I hold the qualifications of Bachelor of Laws (Honours) and Bachelor of Science (Environmental Science and Geography) from the University of Auckland.
- 3 I have 6 years' experience practicing as a planner. Prior to planning, I practiced resource management law for over 2 years. I currently work as a planner for John Edmonds & Associates in Queenstown.
- 4 I am familiar with Carter Group's submission and further submission on the Queenstown Lakes Proposed District Plan 2023 – Proposed Urban Intensification Variation (the *Variation*) to the Queenstown Lakes Proposed District Plan (*PDP*) and its interests in the block of land bound by Man Street, Lake Street, Hay Street and Beach Street (*Carter Group Land*).
- 5 I am also familiar with Centuria's submission and further submission on the Variation to the PDP and its interests in the property at 17-19 Man Street at the corner of Man Street and Brecon Street (*Centuria Land*).

CODE OF CONDUCT

- 6 Although this is not an Environment Court hearing, I note that in preparing my evidence I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023 and I agree to comply with it. My qualifications as an expert are set out above. I confirm that the issues addressed in this brief of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

SCOPE OF EVIDENCE

- 7 In preparing my evidence, I have reviewed:
 - 7.1 Submissions 776 and 743
 - 7.2 Further Submissions on Submissions 776 and 743
 - 7.3 Further Submission 1337 and 1362
 - 7.4 Section 42A Reports, dated 6 June 2025
 - 7.5 QLDC Proposed District Plan
 - 7.6 QLDC Operative District Plan

- 7.7 Section 32 Report and Appendix 3 - Demand and Accessibility Assessment
- 7.8 Housing Development Capacity Assessment 2021
- 7.9 Queenstown Lakes Spatial Plan 2021
- 7.10 National Policy Statement on Urban Development 2020

THE SUBMITTERS

- 8 Carter Group owns the majority of the block of land bound by Man Street, Lake Street, Hay Street and Beach Street.

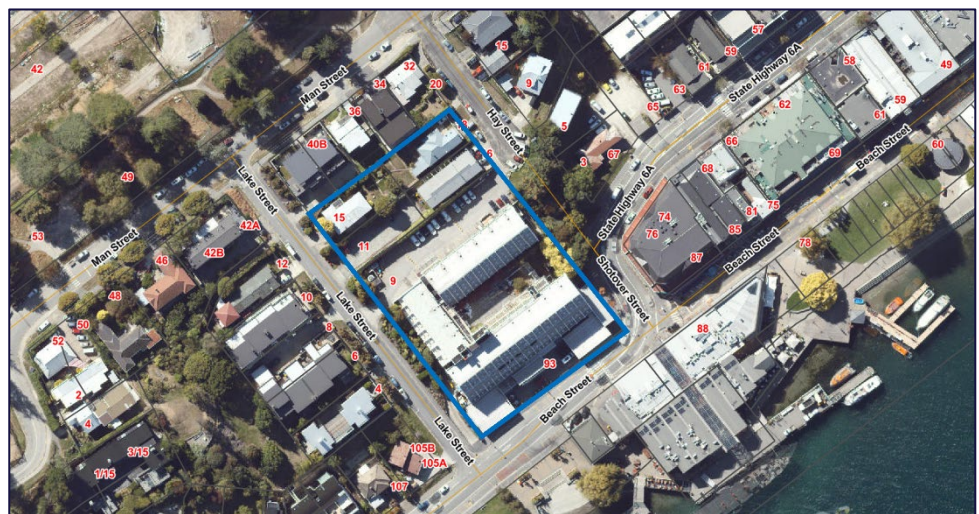


Figure 1: Location of Carter Group Land (outlined in blue)

- 9 The Carter Group Land has an existing land use of a hotel (Crowne Plaza) and residential dwellings.
- 10 The Centuria Land has resource consent RM170564 (and subsequent variations including RM180722) to construct and operate a 80-room hotel, with a maximum height of 18m.

THE SITE CONTEXT – PC50 LAND

- 11 The Carter Group Land and Centuria Land is zoned Town Centre Zone in the Operative District Plan. This zoning was made operative in the ODP in July 2016, as a result of decisions on Plan Change 50 (PC50). The purpose of PC50 was to rezone "High Density Residential" zoned land to "Queenstown Town Centre" zone, to address an identified shortage of land zoned as "Town Centre", as well as providing a planning framework for a convention centre.
- 12 PC50 rezoned four blocks of land (*PC50 Land*), comprising:
 - 12.1 The block of land bound by Man Street, Lake Street, Hay Street and Beach Street (includes the Carter Group Land);

- 12.2 The block of land bound by Man Street, Hay Street, Isle Street and Brecon Street (*Isle Street West Sub-zone*) (includes the Centuria Land);
- 12.3 The block of land bound by Man Street, Camp Street, Isle Street and Brecon Street (*Isle Street East Sub-zone*); and
- 12.4 The block of land bound by Brecon Street, Isle Street, Hay Street, Man Street, Thompson Street, Glasgow Street and the Recreation Reserve (*Lakeview sub-zone*).
- 13 The PDP review has been staged, commencing with notification of Stage 1 in August 2015. The first stage of review included assessment of the Queenstown Town Centre Zone.
- 14 The Stage 1 planning maps did not include the Carter Group Land and any other land subject to the PC50 process, as the PC50 process was not complete by the time notification of Stage 1 of the PDP commenced.
- 15 Subsequent stages of the PDP review have not incorporated the PC50 land that has been rezoned Queenstown Town Centre into the PDP.
- 16 The Operative District Plan objectives, policies and rules remain operative for the Carter Group Land and Centuria Land. The Strategic provisions (Chapters 3 – 6) in the PDP also apply.

THE SUBMISSION (OS 776) AND (OS 743)

- 17 The Summary of Decisions Requested in Submission 776 is:

Submission Point #	Summary of Submission Point / Relief Sought	S42A Recommendation
OS776.1	That the relevant Zoning map be updated to include the PC50 Land, or at the very least the Carter Group Land, as Queenstown Town Centre zone in the Variation.	Reject
OS776.2	That the Carter Group Land be included within 'Figure 2: Queenstown Town Centre Height Precinct Map' of the Queenstown Town Centre Zone chapter of the Variation.	Reject
OS776.3	That the proposed height precinct 1 and a maximum height of 8m along Steamer Wharf and the edge of the lake be retained in the proposed 'Figure 2: Queenstown Town Centre Height Precinct Map'.	Accept
OS776.4	That the part of the land legally described as Section 2 Block XVII Town of Queenstown and comprised in	Reject

	record of title OTB1/226 and zoned Queenstown Town Centre be subject to a height limit of 4m.	
OS776.5	That the proposed definition of 'habitable room' is amended to "Any room in a residential unit or visitor accommodation unit that exceeds 8m ² , except for a garage, hallway, stairwell or laundry".	Reject
OS776.6	That a new definition of 'Principal Habitable Room' is included which reads "That Habitable room within a residential unit or visitor accommodation unit with the largest floor area".	Reject
OS776.7	That Rule 12.5.9 is re-named to read "building facade height and setback of upper floors".	Reject
OS776.8	That the proposed Rule 12.5.10.1 is amended to add "This rule does not apply where a road is located between Residential and Town Centre zoned sites."	Reject
OS776.9	That Rule 12.5.12.1 is amended to read "the principal habitable room must have an outlook space with a minimum dimension of 6m in depth and 4m in width; and".	Reject
OS776.10	That the proposed Rule 12.5.11 is amended to read "A minimum floor to ceiling height of 4m shall apply at the ground floor level of all buildings, except for building adjoining Hay Street and Lake Street".	Reject
OS776.11	That alternative relief should the PC50 land or the Carter Land not be included in the Variation is that Carter Group seek that the whole Variation be rejected on the basis that such a variation should include all relevant land in the district (whether managed by the ODP or the PDP) in order to give effect to the purpose of the Variation and the NPS-UD.	Reject
OS776.12	That the variation subject to the amendments identified in this submission is generally supported.	Accept in part
OS776.13	That the failure of the variation to include land zoned Queenstown Town Centre Zone is opposed.	Reject
OS776.14	That the proposed height precinct 1 in the proposed Queenstown Town Centre Height Precinct Map applying to the land along Steamer Wharf and the edge of the lake is supported.	Reject

OS776.15	That the lack of a clearly defined height limit for the part of land zoned Queenstown Town Centre Zone legally described as Section 2 Block XVII Town of Queenstown and comprised in record of title OTB1/226 is opposed.	Reject
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18 The Summary of Decisions Requested for Submission 743 includes:

- 18.1 that Queenstown Town Centre land within the Isle Street West and Isle Street East sub-zones under the Operative District Plan should be considered for intensification (OS743.2); and
- 18.2 that the Variation is extended to include the site identified in the submission and that this site be included in Height Precinct 4 and subject to the applicable rules for that precinct (OS743.3).

19 The S42A Recommendation recommends rejection of these submission points.

20 There are a number of further submissions to submissions 776, both supporting and opposing the respective submission points.

POINTS IN CONTENTION

21 The recommendations in the s42A reports largely reject the Carter Group and Centuria submission points.

22 My evidence is focused on the following points of contention:

- 22.1 Rezoning of the PC50 Land and/or Carter Group Land and Centuria Land;
- 22.2 Height Precinct classification for the PC50 Land and/or Carter Group Land and Centuria Land;
- 22.3 Height Precinct classification for Steamer Wharf; and
- 22.4 Height Precinct classification for Section 2 Block XVII Town of Queenstown.

REZONING OF PC50 INCLUDING CARTER GROUP LAND AND CENTURIA LAND

23 This evidence will not address legal scope matters. This will be addressed through legal submissions for Carter Group and Centuria at the hearing.

- 24 This evidence is prepared on the basis that the rezoning request is within the scope of the Variation, and squarely 'on' the Variation.
- 25 I consider that it is logical for the PC50 land to be included within the Variation, for efficiency in plan-making processes and to give effect to the NPS-UD. If the PC50 land is not included in the Variation, it will require consideration of the same provisions of the NPS-UD, namely Policy 5, in the future. This will result in duplication of process. Additionally, no timeframes have been provided for PDP review of the PC50 land.
- 26 I consider that the logical zoning of the PC50 land in the PDP is Queenstown Town Centre. The reasons for my position are set out below.
- 27 The PC50 Land is geographically connected to the Queenstown Town Centre zone of the PDP, including the Carter Group Land immediately adjoining land subject to the Variation.
- 28 The section 32 assessment states that PC50 and other special zone areas:¹
- ...include numerous bespoke provisions which are intended to provide specific outcomes in terms of character or to manage effects upon surrounding or adjacent sensitive environments. Consequently, these zones need to be reviewed holistically and they have not been included within the review undertaken in response to the NPS-UD. However, Policy 5 will be a matter of consideration for the review of these ODP zones in the future, when they are brought into the PDP.*
- 29 I agree insofar as the zones should be reviewed holistically, and I consider that includes being incorporated in the Variation response to the NPS-UD for the wider town centre area. Replacement of any existing bespoke provisions and/or perceived sensitivity can be adequately managed through the Variation process.
- 30 The land is suited to Queenstown Town Centre zoning in the PDP, without need for review as a special zone in a later stage of the PDP. The combination of ODP and PDP zonings sets the extent of the Queenstown Town Centre, and the Variation provides an appropriate platform to assess the relevant rules (including heights) holistically. The effect of assessing them separately is that the Variation may result in a substantial change in form and character of the PDP extent of the Queenstown Town Centre.
- 31 The Queenstown Town Centre functions as a whole, including both ODP and PDP zoned land, to create a dynamic and vibrant centre with activities for both residents and visitors. Therefore, I consider it is appropriate to assess proposed changes for all of the town centre at the same time. There is no reason to separate the PC50 Land

¹ Section 32 Assessment, section 5.1.4 at page 18.

from the PDP zoned Queenstown Town Centre extent, when considering the intention of the NPS-UD.

- 32 The NPS-UD requires Tier 2 local authorities (such as the Queenstown Lakes District Council) to implement Policy 5 into their planning documents 'as soon as practicable' and have a proposed plan or plan change notified (which implements Policy 5) no later than 2 years after the commencement of the NPS-UD (20 August 2020). To prevent any further delays to implementation of Policy 5, I consider it preferable for all of the Queenstown Town Centre to be considered at once.
- 33 Inclusion of the PC50 Land is appropriate for achieving the purpose of the Act, and the objectives and purpose of the NPS-UD.
- 34 The section 32 reporting prepared by QLDC included the PC50 Land within the Accessibility and Demand Analysis, as required by Policy 5 of the NPS-UD:
 - 34.1 The Accessibility and Demand Analysis Method Statement (prepared by Barker & Associates, QLDC section 32 reporting, dated 16 May 2023) (ADA) discusses the PC50 Land at [5.4.1]. This report included the PC50 Land within the general extent of the Town Centre analysis for catchments. The accessibility and demand analysis required for enabling heights and density has therefore been undertaken, consistent with requirements of Policy 5 of the NPS-UD.
 - 34.2 The ADA notes at [7.1.1] that the PC50 Land is anticipated to be Town Centre zone and will support access to a variety of goods and services. The proposed roads through PC50 Land were not included in the accessibility analysis, however, are expected to have higher accessibility.
 - 34.3 The spatial implications are addressed in [7.3] of the ADA:
 - (a) *"The accessibility and demand analysis indicates that the spatial extent of areas where more intensive residential activities can occur could be expanded in accordance with the requirements of the NPSUD. In particular, higher levels of intensification in Queenstown around the edges of the town centre (including parts of the PC50 area), Frankton and around the edges of the Wānaka Town Centre are likely to be suitable."*
- 35 The section 32 assessment (also informed by the 2021 Housing Development Capacity Assessment and the Spatial Plan) found that the entirety of the Queenstown Town Centre had high levels of accessibility and demand. It is recommended that increased heights and density of development should be enabled in line with the NPS-UD.

- 36 Based on the findings referenced in paragraph [31], I consider that the failure to include PC50 land in the Variation has not fully given effect to Policy 5 of the NPS-UD. Incorporation of the PC50 Land, or at least the Carter Group Land and/or the Centuria Land, into the Town Centre zone in the PDP is appropriate.
- 37 If the Panel considers the PC50 land needs to be reviewed block by block, Lakeview has its own Masterplan and bespoke height controls for specified land parcels. This area could be considered separately.

Section 32AA Analysis for Rezoning

- 38 For completeness, I make the following comments with respect to section 32AA matters for the rezoning of PC50 Land, to Queenstown Town Centre zone:

- 38.1 The recommended rezoning will more efficiently and effectively achieve the relevant objectives of the PDP, particularly Objective 3.2.3.2 as it will provide for built form that integrates well with the surrounding urban environment;
- 38.2 The benefits are considered to outweigh the costs. There are significant costs to rezone this land through an additional PDP review stage, including that it:
- (a) Will result in inefficient and ineffective outcomes, including associated costs of re-litigating the QTC zone a second time and duplication of NPS-UD process.
 - (b) Creates planning uncertainty and potential built form based on an inconsistent planning framework.

- 39 For the above reasons, I consider that incorporation of the PC50 Land into the PDP as the Queenstown Town Centre zone is more appropriate in achieving the purpose of the RMA than retaining the ODP zoning.

HEIGHT PRECINCT CLASSIFICATION FOR CARTER GROUP AND CENTURIA LAND

- 40 I have reviewed the evidence of David Compton Moen in relation to increased height within the PC50 Land. He finds at paragraph [16] that bringing the PC50 sites up to 24m, with an Upper Floor setback, would allow for greater intensification without creating adverse effects on adjoining properties.
- 41 The Carter Group Land and the landholdings to the north (bound by the same road boundaries) are appropriately located to absorb additional height and intensification. The land has a similar topography to the land to the east, which is proposed for Height Precinct 3.

- 42 The Centuria Land and the landholdings within the Isle Street West sub-block are appropriately located on a main pedestrian thoroughfare connecting the town centre with the Skyline gondola, to absorb additional height and intensification.
- 43 The section 42A report of Mr Cam Wallace indicated that an “amphitheatre approach to the height precincts within the Town Centre Zone” is appropriate, this is discussed in Paragraph 6.2.4 of the Urban Design Report attached to the Section 32 Report. I consider that the location of the Carter Group Land and Centuria Land is on the periphery of the town centre and contributes to forming an edge of the amphitheatre type configuration.
- 44 For the above reasons, I consider that proposed Height Precinct 4 (with standard 12.5.9 setting maximum height of 24m) is the most appropriate height precinct for the Carter Group Land and Centuria Land.

Section 32AA Analysis for Height Precinct

- 45 For the same reasons as my section 32AA analysis for rezoning in paragraphs [35] – [36], I consider that the inclusion of the Carter Group Land and Centuria Land in the proposed ‘Figure 2: Queenstown Town Centre Height Precinct Map’ of the Variation is appropriate for the same reasons.
- 46 Additional section 32AA analysis includes:
- 46.1 As shown by 3D modelling in the evidence of Mr David Compton-Moen, the recommended Height Precinct 4 would enable a consistent approach to building height across the Carter Group Land, Centuria Land and the wider town centre zone.
- 46.2 Replacement of the existing ODP rules for the site (refer Site Standard 10.6.5.1 and Appendix 4, Diagram 8) with a simplified PDP height precinct, will increase plan interpretation and enable more efficient plan administration. The current Site Standard is complicated to apply, therefore improved clarity and efficiency will be a benefit.

HEIGHT PRECINCT CLASSIFICATION FOR SECTION 2 BLOCK XVII TOWN OF QUEENSTOWN

- 47 Carter Group made a submission seeking that Height Precinct classification for Section 2 Block XVII Town of Queenstown and comprised in Record of Title OTB1/226 be subject to a height limit of 4m.
- 48 Ms Corinne Frischknecht recommends in the section 42A report to introduce an additional height precinct (*Precinct 6*) for the specified landholding and apply an 8m height limit.

- 49 This section of land is designated for QLDC as Requiring Authority for a Recreation Reserve, with PDP Town Centre zoning. Given the proximity to the water and the designated purpose for recreation, a height limit of 4m is recommended – reflecting built form typography of one storey. This is considered appropriate on the interface of the Town Centre zone and the Informal Recreation zone.
- 50 Mr David Compton-Moen considers in his urban design evidence that a 4m height limit is appropriate for this specific site, given it is 'public space' for recreation reserve. He considers it is not an appropriate site for intensification, in the same way that the Variation has not enabled intensification in Earnslaw Park.
- 51 For these reasons, I do not agree with the recommendation of Ms Frischneckt to introduce an additional height precinct with a 8m height limit.

FURTHER SUBMISSIONS – IN SUPPORT

- 52 Carter Group and Centuria made further submissions in support of each other's original submission on the Variation.
- 53 Carter Group made further submissions supporting points of five original submissions. Centuria made further submissions in support of three original submissions, these three submissions were also supported by Carter Group. The planning matters are addressed below.

Waka Kotahi, NZ Transport Agency – OS200

- 54 Carter Group made a further submission in support of Waka Kotahi submission points. Carter Group agrees with Waka Kotahi that the NPS-UD Policy 5 will be a matter for consideration in review of the zoning of PC50 Land in the future.
- 55 As set out above, I agree that the NPS-UD requirements in Policy 5 will need to be considered in any future review of the PDP.
- 56 I also agree with Waka Kotahi point OS200.14 that there are more sites in Queenstown and Frankton that are suitable for intensification than were notified in the Variation, including the PC50 land.
- 57 My reasoning for the inclusion of PC50 land in the rezoned area is addressed above.

Rick Pettit – OS298

- 58 Carter Group made a further submission in support of Mr Rick Pettit.
- 59 I agree with Mr Pettit that a 24m height limit would be appropriate in areas with a significant natural height back drop such as the Man Street/Holiday Park area. The Carter Group Land is an extension of

the Man Street area. My reasoning for suggested inclusion in Height Precinct 4 is addressed in paragraphs [33] – [38] of my evidence.

***MacFarlane Investments Limited and JL Thompson – OS767
Upper Village Holdings 3 Limited – OS1252***

- 60 Carter Group and Centuria both made further submissions in support of the above original submissions.
- 61 I support these submission points relating to the failure to include PC50 land within the Variation and Queenstown Town Centre zone of the PDP. I support inclusion of the PC50 Land within the Variation, and the classification of height precincts for PC50 Land.

FURTHER SUBMISSIONS – IN OPPOSITION

- 62 Carter Group made further submissions opposing points of three original submissions. These are addressed below.

Man Street Properties Limited – OS991

- 63 I consider that height limits should apply consistently across the Queenstown Town Centre, including the PC50 Land, for ease of administration as discussed above.
- 64 I do not support the inclusion of a fixed datum point for measuring height on the Man Street Properties Limited site.
- 65 The fixed datum point enables an additional 11.7m of height in the northern extent of Man Street Properties Limited's landholdings, as shown in Profile C of the original submission.
- 66 This could result in bulk and dominance effects from additional height on the standalone site, in an inconsistent manner with the surrounding sites and the "amphitheatre" approach for the wider town centre.

Cactus Kiwi NZ Limited Partnerships – OS1004

- 67 The fixed datum point sought through the original submission could enable an additional 7m height gain when compared to existing ground level (as defined in the PDP).
- 68 For the same reasons as set out above, I do not support the inclusion of a fixed datum point for measuring height for 10 Man Street.

Kopuwai Investments Limited – OS995

- 69 The original submission seeks amendment to the proposed permitted height standard to provide for 11m at 88 Beach Street.
- 70 As set out above, I consider that height limits should apply consistently. Given the location of the site on the waterfront (Steamer Wharf), I consider the 8m height limit proposed in the Variation would be more appropriate. This would give effect to the

“amphitheatre” approach and avoid adverse dominance on the edge of the lake.

CONCLUSIONS

- 71 I consider that the benefits of including PC50 Land in the Variation outweigh potential costs. There will be unnecessary duplication of process if the Council is to wait until a future stage of PDP review.
- 72 I consider that there is inherent efficiency in incorporating the PC50 Land into the Variation now. The Queenstown Town Centre includes both PDP and ODP zoned land. There is a geographical connection to the PDP zoning and the underlying intent of the ODP zoning.
- 73 The approach taken in the Variation does not give effect to the NPS-UD as a whole, and will further delay non-compliance with the implementation timeframe.
- 74 I consider incorporating the PC50 Land to Queenstown Town Centre zoning in the PDP is the most appropriate way to achieve the objectives of the NPS-UD.
- 75 The Carter Group and Centuria Land is appropriately located to absorb additional height, pursuant to Policy 5 of the NPS-UD. The demand and accessibility assessment undertaken in the section 32 reporting included PC50 and indicated higher levels of intensification on the edges of the town centre are likely to be suitable.
- 76 Inclusion of the Carter Group Land and Centuria Land in Height Precinct 4 (with a maximum height of 24m in Rule 12.5.9) is appropriate to enable greater height and density in a highly accessible location.
- 77 The block of land legally described as Section 2 Block XVII Town of Queenstown and comprised in Record of Title OTB1/226 is more appropriate with a height limit of 4m. This reflects the zoning and the designation for recreation reserve.

Dated: 4 July 2025



Charlotte Clouston



URBAN INTENSIFICATION VARIATION - SUBMITTER 776 (FS1337) AND 743 (FS1362)

URBAN DESIGN GRAPHIC SUPPLEMENT

FOR CARTER QUEENSTOWN 2015 LTD AND CENTURIA PROPERTY HOLDCO. LTD
PROJECT NO. 2023_162 | 04 JULY 2025 | REVISION B

URBAN INTENSIFICATION VARIATION - SUBMITTER 776

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LEGEND

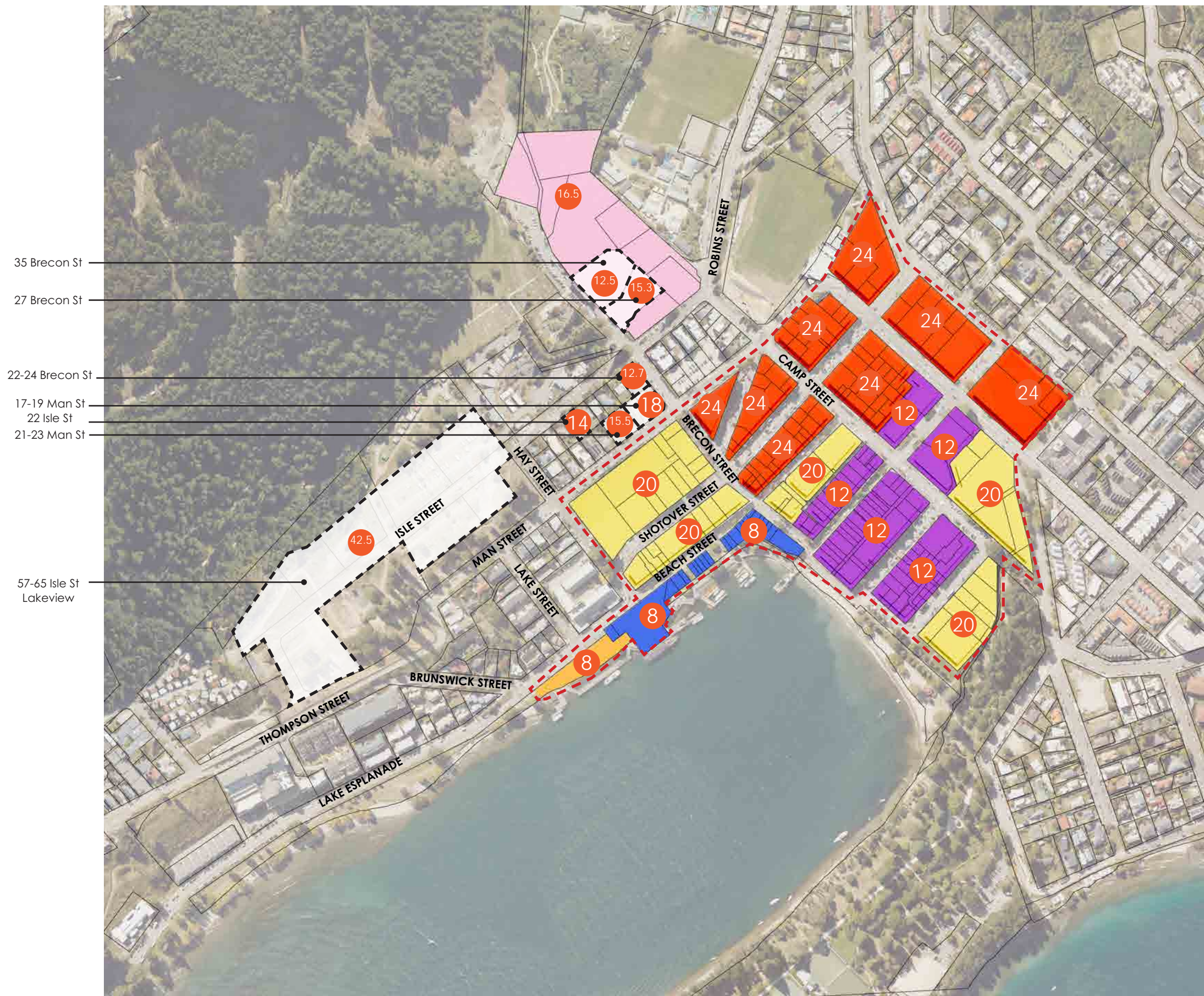
VARIATION PRECINCT HEIGHTS

Precinct 1	8m (total height)
Precinct 2	8m (12m total height)
Precinct 3	12m (20m total height)
Precinct 4	12m (24m total height)
Precinct 5	16.5m (total height)
Precinct 6	8m (total height)

CONSENTED DEVELOPMENT HEIGHTS

35 Brecon Street	12.5m
22-24 Brecon Street	12.7m
22 Isle Street	14m
27 Brecon Street	15.3m
21-23 Man Street	15.5m
17-19 Man Street Centuria	18m
57-65 Isle Street Lakeview	42.5m

--- CURRENT TOWN CENTRE EXTENT UNDER URBAN
INTENSIFICATION VARIATION

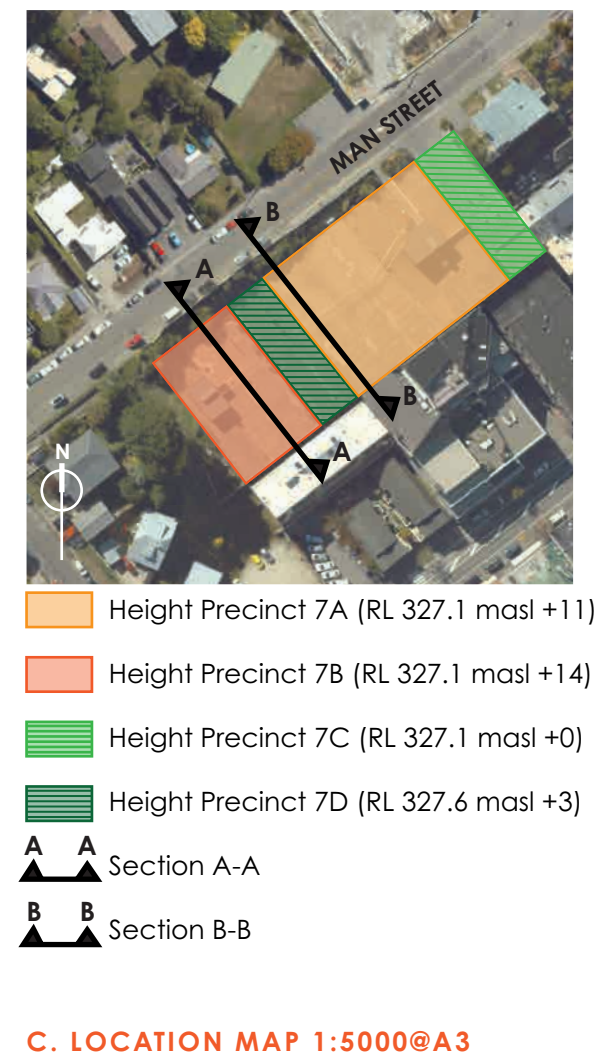
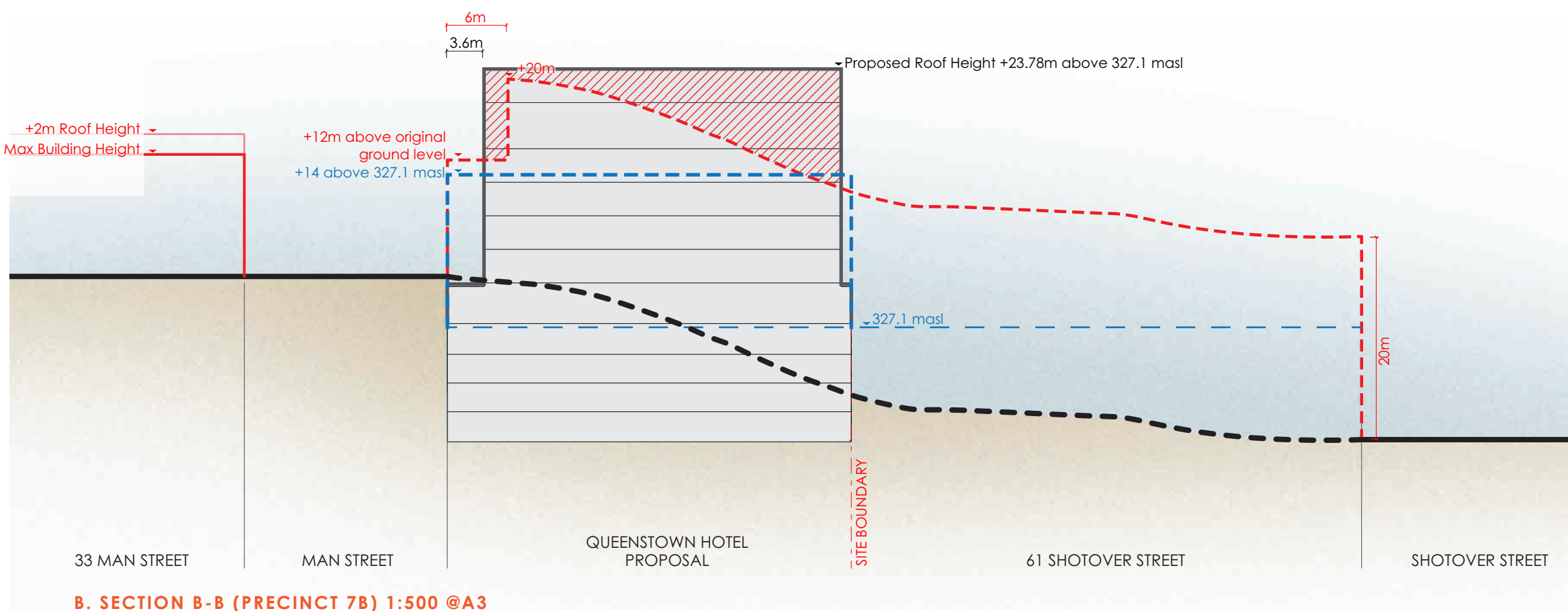
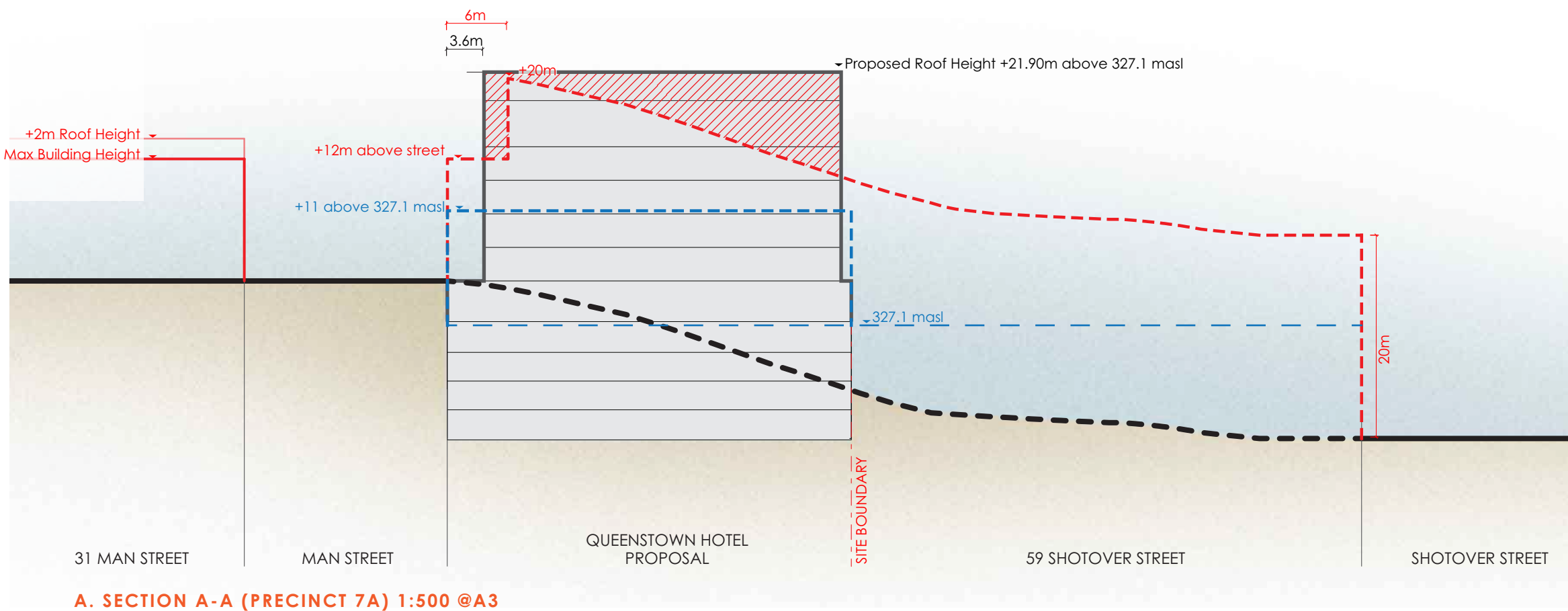


PLAN VIEW - PROPOSED VARIATION HEIGHT LIMITS AND CONSENTED BUILDING HEIGHTS (SCALE 1:5000@A3)

IMAGE SOURCE: LINZ DATA SERVICE 2025

PROPOSED VARIATION HEIGHT LIMITS AND CONSENTED BUILDING HEIGHTS

URBAN INTENSIFICATION VARIATION (SUBMITTER 776) - URBAN DESIGN GRAPHIC SUPPLEMENT



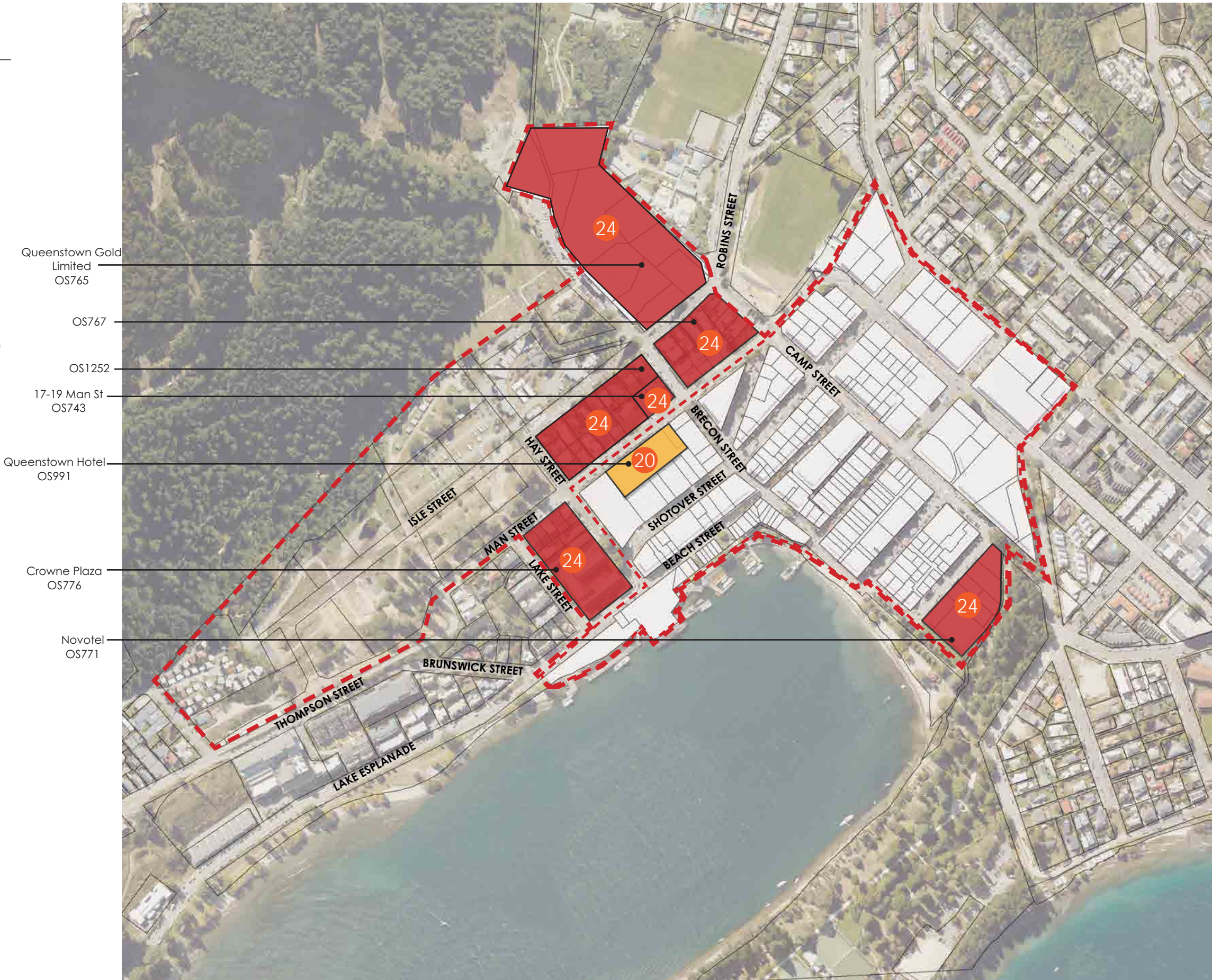
LEGEND

SUBMISSION HEIGHTS

Crowne Plaza Hotel Block	24m
Novotel Hotel	24m
17-19 Man Street Centuria	24m
OS767, OS1252	24m
Queenstown Hotel	20m (from existing carpark height)
Queenstown Gold Limited	24m

 CURRENT TOWN CENTRE EXTENT UNDER URBAN INTENSIFICATION VARIATION

 SUGGESTED TOWN CENTRE EXTENT BASED ON BUILT FORM BOTH ANTICIPATED AND CONSENTED



PLAN VIEW - PROPOSED SUBMISSION HEIGHT LIMITS (SCALE 1:5000@A3)
IMAGE SOURCE: LINZ DATA SERVICE 2025

PROPOSED SUBMISSION HEIGHT LIMITS

URBAN INTENSIFICATION VARIATION (SUBMITTER 776) - URBAN DESIGN GRAPHIC SUPPLEMENT

LEGEND

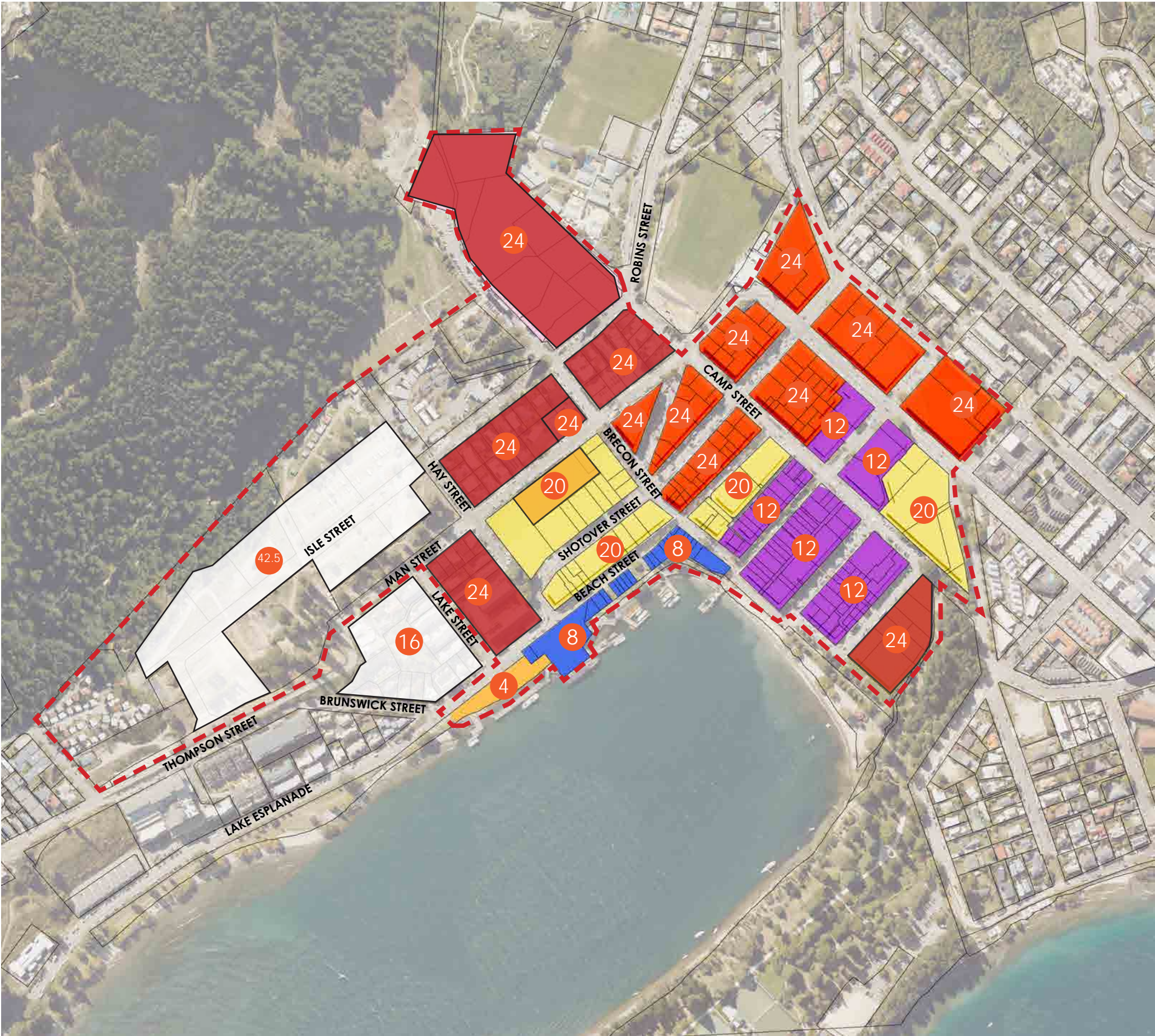
VARIATION PRECINCT HEIGHTS

Precinct 1	8m (total height)
Precinct 2	8m (12m total height)
Precinct 3	12m (20m total height)
Precinct 4	12m (24m total height)
Precinct 5	24m (total height)
Precinct 6	4m (total height)

SUBMISSION HEIGHTS

Crowne Plaza Hotel Block	24m
Novotel Hotel	24m
17-19 Man Street Centuria	24m
PC50	24m
Queenstown Hotel	20m (from existing carpark height)

TOWN CENTRE EXTENT BASED ON BUILT FORM BOTH ANTICIPATED AND CONSENTED



PLAN VIEW - PROPOSED AND SUBMISSION HEIGHT LIMITS (SCALE 1:5000@A3)
IMAGE SOURCE: LINZ DATA SERVICE 2025

PROPOSED AND SUBMISSION HEIGHT LIMITS COMBINED

URBAN INTENSIFICATION VARIATION (SUBMITTER 776) - URBAN DESIGN GRAPHIC SUPPLEMENT



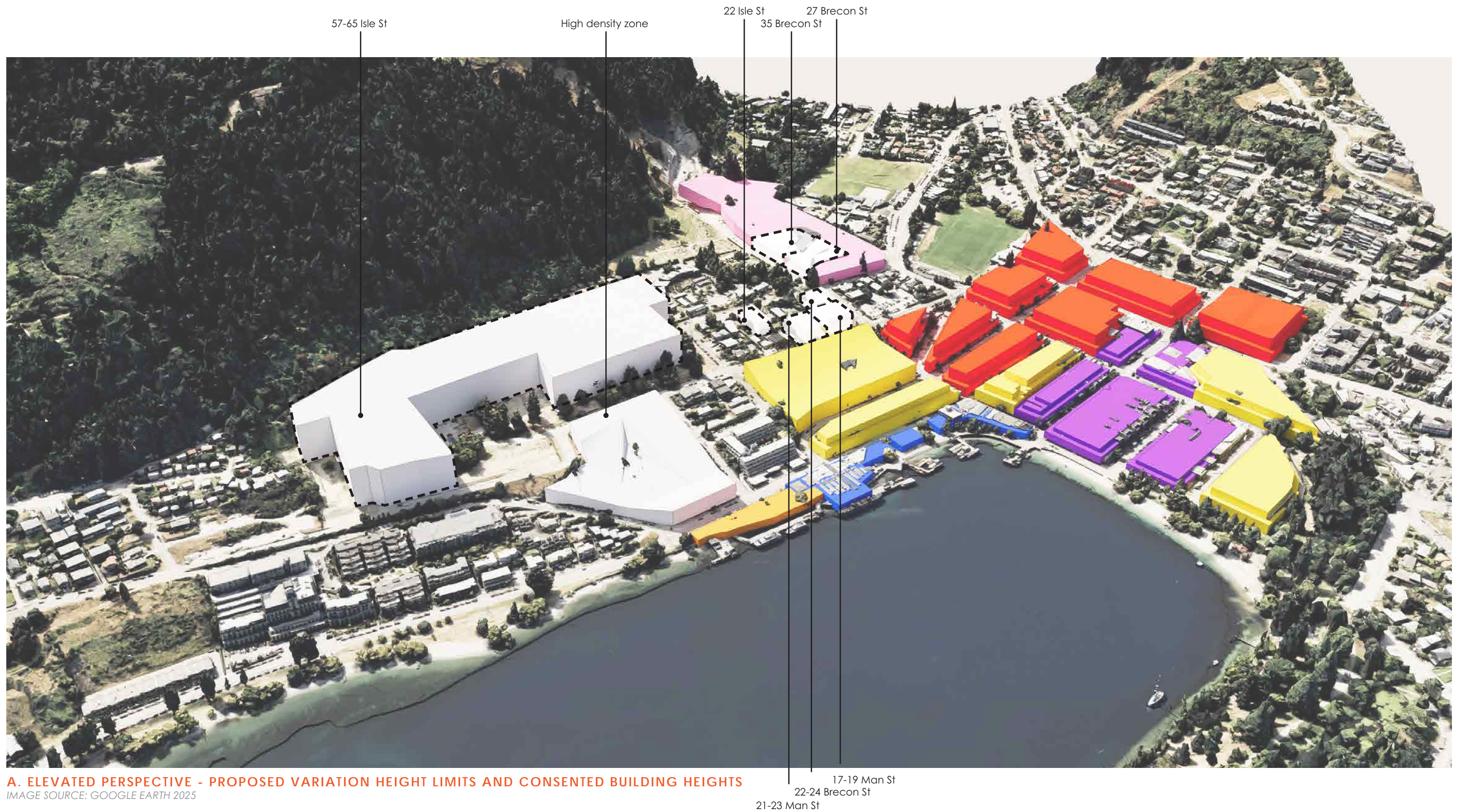
A. ELEVATED PERSPECTIVE - EXISTING VIEW

IMAGE SOURCE: GOOGLE EARTH 2025

ELEVATED PERSPECTIVE - EXISTING VIEW

URBAN INTENSIFICATION VARIATION (SUBMITTER 776) - URBAN DESIGN GRAPHIC SUPPLEMENT

2023_162_QLDC_Crowne Plaza_B



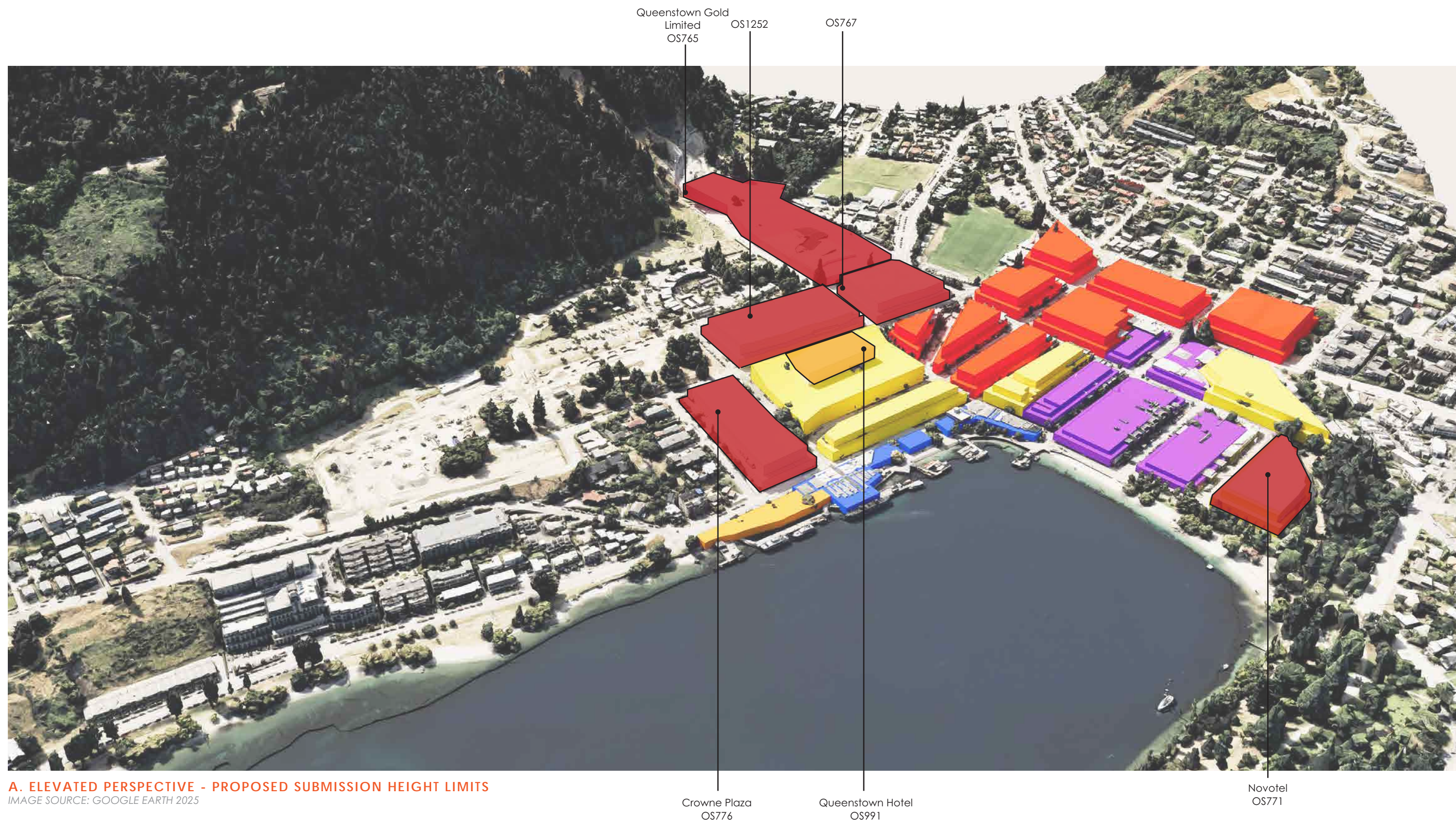
A. ELEVATED PERSPECTIVE - PROPOSED VARIATION HEIGHT LIMITS AND CONSENTED BUILDING HEIGHTS
 IMAGE SOURCE: GOOGLE EARTH 2025

LEGEND

Precinct 1	8m (total height)	Precinct 6	8m (total height)	27 Brecon Street	15.3m
Precinct 2	8m (12m total height)			21-23 Man Street	15.5m
Precinct 3	12m (20m total height)	35 Brecon Street	12.56m	17-19 Man Street	18m
Precinct 4	12m (24m total height)	22-24 Brecon Street	12.7m	57-65 Isle Street	42.5m
Precinct 5	16.5m (total height)	22 Isle Street	14m		

ELEVATED PERSPECTIVE - PROPOSED VARIATION HEIGHT LIMITS AND CONSENTED HEIGHT LIMITS

URBAN INTENSIFICATION VARIATION (SUBMITTER 776) - URBAN DESIGN GRAPHIC SUPPLEMENT



LEGEND

 Crowne Plaza	24m	 Queenstown Hotel	20m (from existing carpark height)
 Novotel	24m	 Queenstown Gold Limited	24m
 17-19 Man Street	24m		
 PC50	24m		

ELEVATED PERSPECTIVE - PROPOSED SUBMISSION HEIGHT LIMITS

URBAN INTENSIFICATION VARIATION (SUBMITTER 776) - URBAN DESIGN GRAPHIC SUPPLEMENT



A. ELEVATED PERSPECTIVE - PROPOSED AND SUBMISSION HEIGHT LIMITS

IMAGE SOURCE: GOOGLE EARTH 2025

LEGEND

Precinct 1	8m (total height)	Precinct 6	4m (total height)	34 Brecon Street	27.7m
Precinct 2	8m (12m total height)			PC50	24m
Precinct 3	12m (20m total height)	Crowne Plaza Hotel Block	24m	Queenstown Hotel	20m (from existing carpark height)
Precinct 4	12m (24m total height)	Novotel Hotel	24m	Queenstown Gold Limited	24m
Precinct 5	24m (total height)	17-19 Man Street Centuria	24m		

ELEVATED PERSPECTIVE - PROPOSED AND SUBMISSION HEIGHT LIMITS

URBAN INTENSIFICATION VARIATION (SUBMITTER 776) - URBAN DESIGN GRAPHIC SUPPLEMENT



A. PERSPECTIVE - EXISTING VIEW

IMAGE SOURCE: GOOGLE EARTH 2025

PERSPECTIVE - EXISTING VIEW

URBAN INTENSIFICATION VARIATION (SUBMITTER 776) - URBAN DESIGN GRAPHIC SUPPLEMENT

2023_162_QLDC_Crowne Plaza_B

57-65 Isle Street, Lakeview



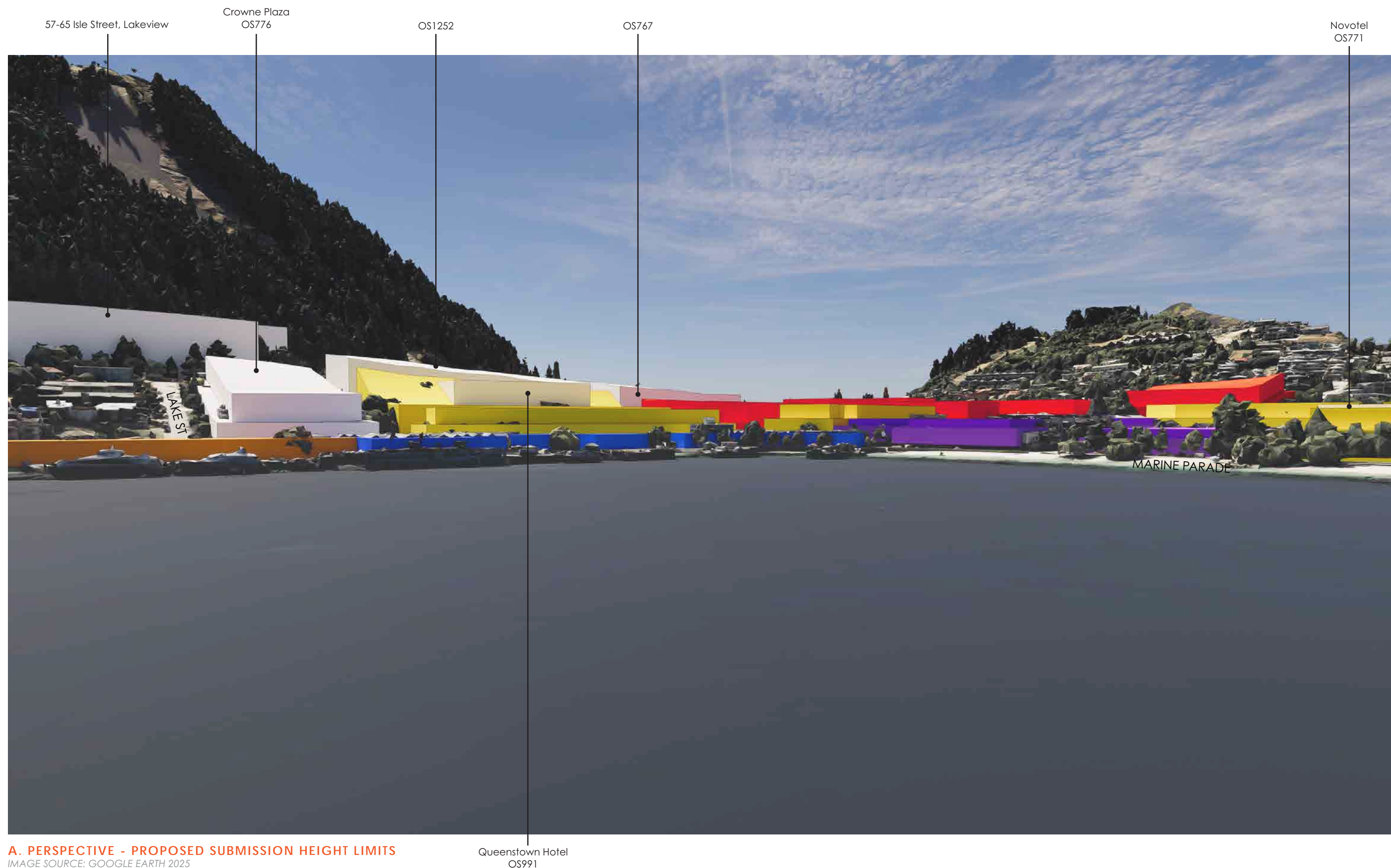
A. PERSPECTIVE - PROPOSED VARIATION HEIGHT LIMITS AND CONSENTED BUILDING HEIGHTS

IMAGE SOURCE: GOOGLE EARTH 2025

PERSPECTIVE - PROPOSED VARIATION HEIGHT LIMITS AND CONSENTED HEIGHT LIMITS

URBAN INTENSIFICATION VARIATION (SUBMITTER 776) - URBAN DESIGN GRAPHIC SUPPLEMENT

2023_162_QLDC_Crowne Plaza_B



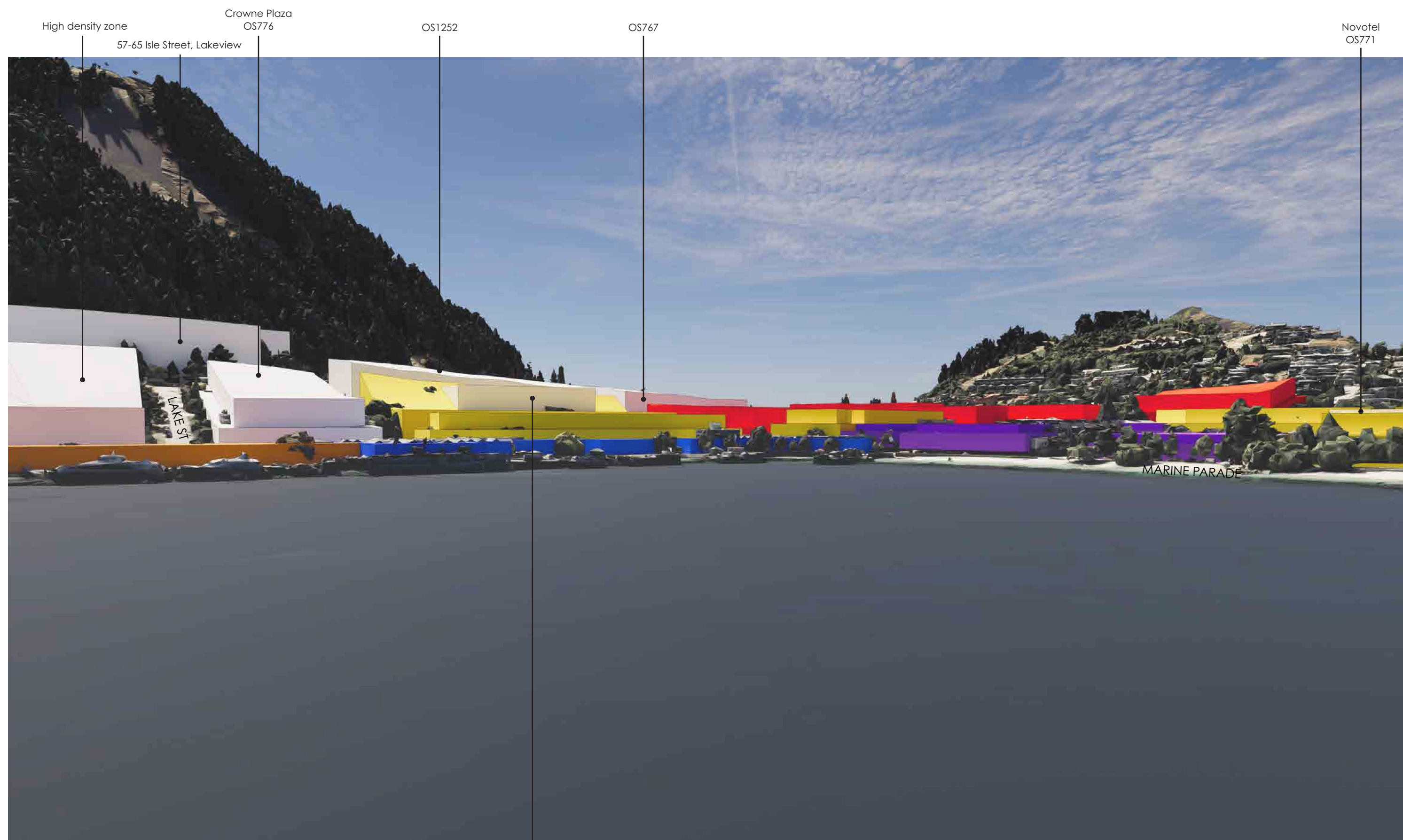
A. PERSPECTIVE - PROPOSED SUBMISSION HEIGHT LIMITS

IMAGE SOURCE: GOOGLE EARTH 2025

PERSPECTIVE - PROPOSED SUBMISSION HEIGHT LIMITS

URBAN INTENSIFICATION VARIATION (SUBMITTER 776) - URBAN DESIGN GRAPHIC SUPPLEMENT

2023_162_QLDC_Crowne Plaza_B



A. PERSPECTIVE - PROPOSED AND SUBMISSION HEIGHT LIMITS

IMAGE SOURCE: GOOGLE EARTH 2025

PERSPECTIVE - PROPOSED AND SUBMISSION HEIGHT LIMITS

URBAN INTENSIFICATION VARIATION (SUBMITTER 776) - URBAN DESIGN GRAPHIC SUPPLEMENT

2023_162_QLDC_Crowne Plaza_B



A. VP1 - EXISTING SITE



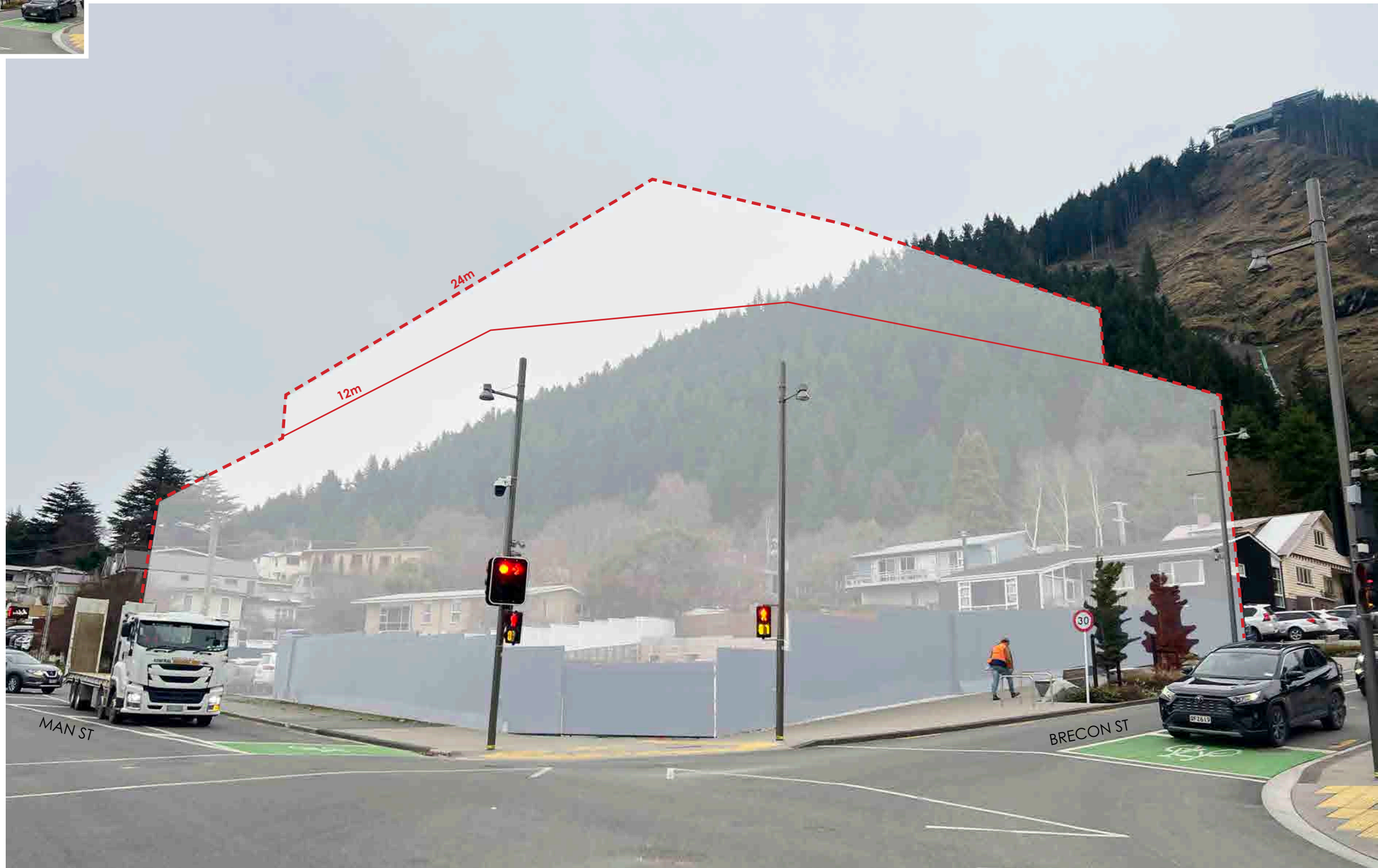
B. VP1 - SITE WITH SUBMISSION HEIGHT ENVELOPE

VP1 - CROWNE PLAZA BLOCK FROM LAKE ESPLANADE

URBAN INTENSIFICATION VARIATION (SUBMITTER 776) - URBAN DESIGN GRAPHIC SUPPLEMENT



A. VP2 - EXISTING SITE



B. VP2 - SITE WITH SUBMISSION HEIGHT ENVELOPE

VP2 - CENTURIA SITE FROM MAN STREET

URBAN INTENSIFICATION VARIATION (SUBMITTER 776) - URBAN DESIGN GRAPHIC SUPPLEMENT