

Before an Independent Hearings Panel  
Appointed by Queenstown Lakes District Council

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*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)

Statement of evidence of Charlotte Clouston

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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 QGL's 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 at 27 Brecon Street (*QGL Land*).

### **CODE OF CONDUCT**

- 5 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**

- 6 The purpose of my evidence, I have reviewed:
  - 6.1 Submission 765
  - 6.2 Section 42A Reports, dated 6 June 2025
  - 6.3 QLDC Proposed District Plan
  - 6.4 QLDC Operative District Plan
  - 6.5 Section 32 Report and Appendices
  - 6.6 National Policy Statement on Urban Development 2020 (*NPS-UD*)

## **THE SITE CONTEXT**

- 7 QGL owns land at 27 Brecon Street, Queenstown.
- 8 The existing land use is a commercial building for an indoor skydiving activity.
- 9 The QGL Land is zoned Queenstown Town Centre (*QTCZ*) in the PDP and subject to Height Precinct P1(A). The existing discretionary height limit for the site is 12m, subject to a recession plane at 45 degrees from 10m above the street boundary (Rule 12.5.8) and maximum height limit of 15.5m (Rule 12.5.9.1).
- 10 The PDP zoning is not subject to appeals; therefore, the PDP objectives, policies and rules are deemed operative for the QGL Land.

## **THE SUBMISSION (OS765)**

- 11 The QGL submission generally supported the Variation, subject to amendments identified in OS765.
- 12 QGL sought reclassification of the QGL Land and adjacent land on the Brecon Street boundary within the proposed Height Precinct Map in the Variation. The reclassification sought was from Height Precinct 5 to Height Precinct 4.
- 13 There are no further submissions to OS765.
- 14 The Section 42A reports recommended position accepts in part the general support for the Variation. The section 42A reports otherwise reject the QGL submission points.

## **POINTS IN CONTENTION**

- 15 My evidence is focused on the following points of contention:
  - 15.1 Reclassification of Height Precinct for QGL Land – Rule 12.5.9.
- 16 This evidence is prepared on the basis that the relief sought is within the scope of the Variation, and squarely 'on' the Variation.

## **RECLASSIFICATION OF HEIGHT PRECINCT**

### **Section 42A recommendation**

- 17 The s42A report of Ms Corinne Frischnecht for Chapter 12 addresses requests for reclassification of height precincts at paragraph [5.66], referring to her commentary on maximum building heights in the section starting [5.56] of her report.

- 18 Ms Frischneckt considers at paragraph [5.59] and [5.60] that the new policy approach for heights in the QTCZ in the Variation as notified is appropriate and that individual development proposals should be considered on their merits regarding notification.
- 19 I am not clear how the reasoning provided by Ms Frischneckt in paragraph [5.56] onwards responds to the request for location-specific reclassification.
- 20 The s42A reporting does not provide any comment or consideration of the location specific request for the QGL Land and adjoining sites.
- 21 The s42A Urban Design report of Mr Cameron Wallace states at [13.5]:

*"As a general principle, I consider it appropriate to provide for the greatest density of development (as expressed through height and building coverage) within the QTC due to its role within the wider urban environment, level of accessibility and relative demand from a range of different land-use activities. In my opinion, the UIV has struck an appropriate balance in facilitating this (in line with the expectations of the NPS-UD) whilst seeking to respond to the specific context of the QTC."*

- 22 Mr Wallace further describes in [13.5] the approach to building heights in the Variation, specifically referencing the "amphitheatre" type pattern of development where building height rises away from the lakefront and responding to the heritage character and lower scale of development around Ballarat, Church and Earl Streets.
- 23 I consider the s42A reporting has failed to consider the content of the submission and relief sought in making its recommendation.

#### **Urban Design considerations**

- 24 Urban design evidence has been prepared by Mr Dave Compton-Moen.
- 25 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.

#### **Planning considerations**

- 26 The NPS-UD direction in Policy 5 is to enable height and density commensurate to the accessibility and demand in that location.
- 27 The Accessibility and Demand Analysis Method Statement (Appendix 3 of the section 32 report) determines at section [7.11] that Queenstown Town Centre has the highest level of accessibility across the district.

- 28 The Urban Design Report (Appendix 4 of the Section 32 report) proposes the Height Precinct Map as notified in the Variation.
- 29 The QGL Land is located on upper Brecon Street, which has been part of QLDC's Major Project: '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 Gondola (referred to in QLDC media as the 'Gardens to Gondola' walking route).
- 30 Works to Brecon Street included footpath widening to 4 – 5 metres and new pedestrian crossings to give greater pedestrian priority. The investment in significant active transport infrastructure signals anticipated increase in accessibility going forward.
- 31 The proposed height precinct classification of Height Precinct 5 in the Variation as notified provides for a 16m maximum height.
- 32 The recommended provisions in Appendix 1 of the Strategic Evidence s42A includes a disconnect between the text of proposed Rule 12.5.9 stating 16m height for Height Precinct 5, and the proposed Figure 2 Height Precinct Map, which shows a 16.5m height for Height Precinct 5.
- 33 In any case, I consider that the upper Brecon Street location is suitable for additional height beyond that currently proposed in the Variation.
- 34 The receiving environment includes a number of consented activities on sites within the immediate vicinity of the QGL Land.
- 35 For example, the existing building on the QGL Land has a maximum height of 15.3m (RM150766). The adjoining site to the north-east has a maximum building height of 12.56m (RM191041). Further north on Brecon Street, within the same proposed Height Precinct, the recently constructed Skyline carparking building has a maximum height of 24.1m (RM171172).
- 36 The opposite side of Brecon Street to the QGL Land, subject to ODP provisions, had a consented height for a hotel development of 23m (RM180507). An alternative commercial hot pools activity has since been progressed on this site (RM240853).
- 37 I consider the receiving environment is appropriate for absorbing additional height, as the upper end of the "amphitheatre" of QTCZ. In my view this includes all of the land within the Precinct.

- 38 There are no protected viewshafts that would be affected by a rise in the maximum height limit from 16m to 24m in the relief sought.
- 39 Views towards this area would be seen in the context of the Bobs Peak Recreation Reserve and Skyline Gondola operating in the background.
- 40 Setback controls as proposed in the Variation would provide urban design control for upper levels of the permitted height.
- 41 I consider the receiving environment is appropriate for absorbing additional height, and reclassification to Height Precinct 4 would provide an additional edge to the “amphitheatre” approach.
- 42 My recommended area for reclassification is the block of QTCZ land bound by Brecon Street and Isle Street to Height Precinct 4.

### **Section 32AA analysis**

- 43 Section 32 reporting has been completed for the Variation, including the proposed Height Precinct Plan and Rule 12.5.9.
- 44 For completeness I make the following comments with respect to section 32AA matters:
- 44.1 Urban design evidence has been supplied by Mr Dave Compton-Moen to support the specific requested amendment.
- 44.2 The greater height is commensurate with high accessibility for the QTCZ and will enable increased intensification within the highest order centre. This is consistent with PDP Strategic Objective 3.2.1.2 and Strategic Policy 3.3.3. Recent upgrades to Brecon Street support increased intensification and accessibility of this corridor.
- 44.3 A benefit of increased height is enabling greater built form, which will enable more people to locate in the QTCZ in line with Objective 3 of the NPS-UD.
- 44.4 The benefits are considered to outweigh the costs.
- 45 For the reasons above, I consider that the reclassification of the QGL Land and surrounding QTCZ land from Height Precinct 5 to Height Precinct 4 is more appropriate in achieving the purpose of the RMA than the Variation as notified.

**CONCLUSIONS**

- 46 I support the relief sought by QGL Land, with extension of the Height Precinct change to surrounding land.
- 47 I consider amendment to the Variation Height Precinct Map to reclassify the block of QTCZ land bound by Brecon Street and Isle Street to Height Precinct 4 is appropriate.

Dated: 4 July 2025



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Charlotte Clouston