

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

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 Continuum'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 2 and 22 Earl Street (*Continuum 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 771
  - 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 Continuum Hotel Limited owns land at 2 and 22 Earl Street, Queenstown.
- 8 The existing land use is the Novotel hotel.
- 9 The Continuum Land is zoned Queenstown Town Centre (*QTCZ*) in the PDP and subject to Height Precinct 4. The existing discretionary height limit for the site is 10m (Rule 12.5.8) and maximum height limit of 12m (Rule 12.5.9.5).
- 10 The PDP zoning is not subject to appeals; therefore, the PDP objectives, policies and rules are deemed operative for the Continuum Land.

## **THE SUBMISSION (OS771)**

- 11 The Continuum submission generally supported the Variation, subject to amendments identified in OS771.
- 12 Continuum sought reclassification of the Continuum Land within the proposed Height Precinct Map in the Variation. The reclassification sought was from Height Precinct 3 to Height Precinct 4.
- 13 Continuum also sought amendment to the definition and rule relating to 'Habitable Room' and 'Outlook Space'.
- 14 There are no further submissions to OS771.
- 15 The section 42A recommended position accepts in part the general support for the Variation. The section 42A reports otherwise reject all of the Continuum submission points.

## **POINTS IN CONTENTION**

- 16 My evidence is focused on the following points of contention:
  - 16.1 Reclassification of Height Precinct for Continuum Land – Rule 12.5.9.
- 17 This evidence is prepared on the basis that the rezoning request is within the scope of the Variation, and squarely 'on' the Variation.

## **RECLASSIFICATION OF HEIGHT PRECINCT**

### **Section 42A recommendation**

- 18 The s42A report of Ms Corinne Frischneckt 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.
- 19 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.
- 20 I am not clear how the reasoning provided by Ms Frischneckt in paragraph [5.56] onwards responds to the request for reclassification.
- 21 The s42A reporting does not provide any comment or consideration of the site specific request for Continuum Land.
- 22 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."*
- 23 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.
- 24 I consider the s42A reporting has failed to consider the content of the submission and relief sought in making its recommendation.

### **Urban Design considerations**

- 25 Urban design evidence has been prepared by Mr Dave Compton-Moen. His evidence concludes that increasing the block's height is consistent with other blocks in the Town Centre.

### **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 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. These reserves provide separation distance from the adjoining built form.
- 30 As set out in OS771, there are no viewshafts that would be affected by a rise from maximum height of 20m to 24m in the requested reclassification.
- 31 Nearby properties on Coronation Drive and Park Street that look out to Lake Whakatipu are elevated above the site and/or separated by mature vegetation in the Queenstown Gardens Recreation Reserve.
- 32 Views across to the Continuum Land would be seen in the context of other built form in the QTCZ, and the backdrop of mature vegetation and the Queenstown Gardens.
- 33 Long-range views to Outstanding Natural Landscapes would not be affected.
- 34 Setback controls as proposed in the Variation would provide design control for upper levels of the permitted height.
- 35 I consider the reclassification of the Continuum Land to Height Precinct 4 would provide an additional edge to the "amphitheatre" approach.

### **Section 32AA analysis**

- 36 Section 32 reporting has been completed for the Variation, including the proposed Height Precinct Plan and Rule 12.5.9.
- 37 For completeness I make the following comments with respect to section 32AA matters:
  - 37.1 Urban design evidence has been supplied to support the specific requested amendment.
  - 37.2 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.

37.3 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.

37.4 The benefits are considered to outweigh the costs.

38 For the reasons above, I consider that the reclassification of the Continuum Land from Height Precinct 3 to Height Precinct 4 is more appropriate in achieving the purpose of the RMA than the Variation as notified.

### **CONCLUSIONS**

39 I support the relief sought by Continuum.

40 I consider amendment to the Variation Height Precinct Map to reclassify the Continuum Land as Height Precinct 4 is appropriate.

Dated: 4 July 2025



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Charlotte Clouston