

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:* **Coherent Hotel Limited (Coherent)**  
(Submitter 773 and Further Submitter 1351)

*and:* **S Haines and M Spencer**  
(Further Submitter S1348)

*and:* **D and M Columb**  
(Further Submitter 1349)

*and:* **S and R Millar**  
(Further Submitter 1350)

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 Coherent'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 their respective interests in the block of land at 90, 92 and 94 Thompson Street (*Coherent Land*), 98, 101, 108A and 110 Thompson Street (collectively *the Submitters' 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 773 and Further Submissions 1351, 1348, 1349 and 1350
  - 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 SUBMITTERS**

- 7 Coherent Hotel Limited owns land at 90, 92 and 94 Thompson Street, Queenstown.
- 8 Coherent Hotel Limited currently has a resource consent application processing with QLDC for a residential (worker) accommodation development at the site. The proposal includes 58 residential units/rooms across three buildings and associated carparking.
- 9 The other further submitters own existing residential properties at 98, 101, 108A and 110 Thompson Street.

## **THE SITE CONTEXT**

- 10 The Coherent land at 90 and 92 Thompson Street is zoned High Density Residential (*HDR*). The remainder of the Submitters' Land, including 94 Thompson Street is zoned Medium Density Residential (*MDR*) under the Proposed District Plan. This zoning is not subject to appeals; therefore the PDP objectives, policies and rules are deemed operative for the Submitters' Land.

## **THE SUBMISSION (OS773)**

- 11 The Coherent submission generally supported the Variation, subject to amendments identified in OS773.
- 12 There are no further submissions to OS773.
- 13 The section 42A recommended position accepts in part, and rejects parts of OS773.

## **THE FURTHER SUBMISSIONS**

- 14 The further submissions collectively request the same relief, being rezoning of the western end of Thompson Street.
- 15 The further submitters lodged a further submission to OS200 of Evan Keating on behalf of Waka Kotahi, NZ Transport Agency.
- 16 The further submitters support the Waka Kotahi submission seeking upzoning of land within walking distance of the Queenstown Town Centre to High Density Residential, unless subject to constraints.
- 17 The further submission sought consequential amendment to the Variation to rezone 94 Thompson Street and the Medium Density Residential zoned land on Thompson Street to High Density Residential.

## **POINTS IN CONTENTION**

- 18 My evidence is focused on the following points of contention:
- 18.1 Rezoning of the Medium Density Residential land on Thompson Street to High Density Residential.
- 19 This evidence is prepared on the basis that the rezoning request is within the scope of the Variation, and squarely 'on' the Variation.
- 20 Legal submissions will be presented at the hearing to discuss any legal scope matters. I do not discuss legal scope matters further.

## **REZONING OF MDR TO HDR IN PROXIMITY TO THE TOWN CENTRE**

- 21 The s42A report of Ms Amy Bowbyes at paragraph [9.7] states:
- "The rezoning of land proposed by the UIV is identified as being land close to the commercial areas in Queenstown, Frankton and Wānaka, this narrows the scope of any rezoning requests to areas that can be characterised as being close to those three commercial areas".*
- 22 I consider Thompson Street, including the Submitters Land, is close to the commercial area in Queenstown i.e. the extent of the town centre, including both PDP and Operative District Plan town centre zones. This is within the planning scope as set out by Ms Bowbyes.
- 23 A consequential amendment to the Variation is sought to include the Submitters Land and the surrounding MDR land (Thompson Street cul-de-sac) in the HDR zone.
- 24 There is no discussion of the rezoning requested by the further submitters (FS1348, FS1348, FS1350 and FS1351) in the s42A report of Ms Rachel Grace Morgan for rezoning requests for the residential zones.
- 25 I support the requested upzoning of the Submitters Land and the surrounding MDR land to High Density Residential. The reasons for my position are set out below.
- 26 The Coherent Land includes a split zoning of HDR and MDR. The remainder of Thompson Street is a cul-de-sac, with a defined extent. There is no obvious differentiator to the zoning or locality when physically viewing the site and surrounding environment.

- 27 The road continues sloping upwards from the boundary of HDR zoning on both sides (92 and 89 Thompson Street) to the end of the cul-de-sac. The existing land use is residential in nature. One Mile Reserve is located to the south.
- 28 The Submitters' Land is near the town centre and to walking and cycling access to Fernhill through the One Mile Creek Reserve trail network. The trail head is located at the end of the cul-de-sac, approximately 100m from the Coherent Land (the furthest away of the MDR zoned land).
- 29 The vertical separation from the lake level and town centre elevation to the Submitters' Land is approximately 50m at the maximum change. This is similar to, and in instances less than, the change in elevation from the town centre to the HDR zoned land east of the town centre (Queenstown Hill). The walking distance from the town centre to the Submitters' Land may be slightly longer, however, is a more gradual incline. This may be more favourable for access by active transport.
- 30 The Accessibility and Demand Analysis Method Statement (Appendix 3 of the section 32 report) indicates at [7.11] that the western ends of Thompson Street and Lomond Crescent should be considered an area of higher accessibility.
- 31 In line with Policy 5 of the NPS-UD, I consider the height and density should be increased for the western ends of Thompson Street and Lomond Crescent, to be commensurate to the level of accessibility in this area.
- 32 I am not aware of any constraints that would require retention of MDR zoning in this area.

### **Section 32AA analysis**

- 33 The section 32 reporting did not include any comment or option assessment for rezoning of Thompson Street.
- 34 I consider this is a failure to capture all land deemed appropriate for commensurate intensification in line with the NPS-UD.
- 35 For the recommended rezoning of the MDR land to HDR land, I make the following comments with respect to section 32AA matters:
- 35.1 The existing zoning pattern creates an inconsistent planning framework for an isolated area of MDR zoned land that is close to the town centre.
- 35.2 Rezoning the MDR land in the western end of Thompson Street and Lomond Crescent will more efficiently and effectively achieve the relevant objectives of

the PDP. In particular, Strategic Objective 3.2.3.2 for built form that integrates well with its surrounding urban environment. Consistency in the zoning of this discrete area and the adjoining HDR will provide for cohesive anticipated built form.

- 35.3 The rezoning of the MDR land is also the most appropriate way of achieving the objectives of the NPS-UD, including Objectives 1 and 3 to provide for well-functioning urban environments and enable more people to live in urban areas near employment and transport opportunities or with high housing and business demand.
- 35.4 The benefits are considered to outweigh the costs. There is a missed opportunity cost if this land is not assessed for rezoning through the Variation, particularly in light of findings in the Accessibility and Demand Analysis Method Statement referred to in paragraph [7.11].
- 35.5 The risk of not acting includes potential costs for a private plan change or additional stage of plan review to upzone the land in future to provide for the NPS-UD. There is an opportunity to include the land area in appropriate zoning now.
- 35.6 I do not consider a need to assess the risk of acting or not acting as there is sufficient information available to make a decision on the matter.
- 36 For the reasons above, I consider that rezoning the western end of Thompson Street and Lomond Crescent, including the Submitters' Land, is more appropriate in achieving the purpose of the RMA than the notified PDP zoning.

## **CONCLUSIONS**

- 37 I support the relief sought by the Coherent submission and further submissions.
- 38 I consider a consequential amendment to the Variation to rezone the Submitters' Land, and the surrounding Thompson Street and Lomond Crescent MDR zoned land to HDR is appropriate.
- 39 I have provided section 32AA analysis, such that a decision on the zoning can be made.

Dated: 4 July 2025



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Charlotte Clouston