

Before the Hearing Panel

Under the Resource Management Act 1991 (**Act**)

In the matter of Priority Area Landscape Schedules Variation to the  
Queenstown Lakes Proposed District Plan

---

**Memorandum of Counsel**

26 October 2023

---

**Submitters solicitors:**  
Maree Baker-Galloway | Rosie Hill  
Anderson Lloyd  
Level 2, 13 Camp Street, Queenstown 9300  
PO Box 201, Queenstown 9348  
p + 64 3 450 0700  
maree.baker-galloway@al.nz | rosie.hill@al.nz

**anderson  
lloyd.**

**May it please the Court**

- 1 In response to the Commissioners' request for further slope analysis of the Passion Developments Limited Site, Mr Skelton has prepared this further information, included as 'Appendix 1' to this Memorandum.
- 2 PDL will be obliged to provide any further information or evidence in response to this analysis, or questions arising from the same.



---

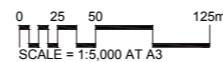
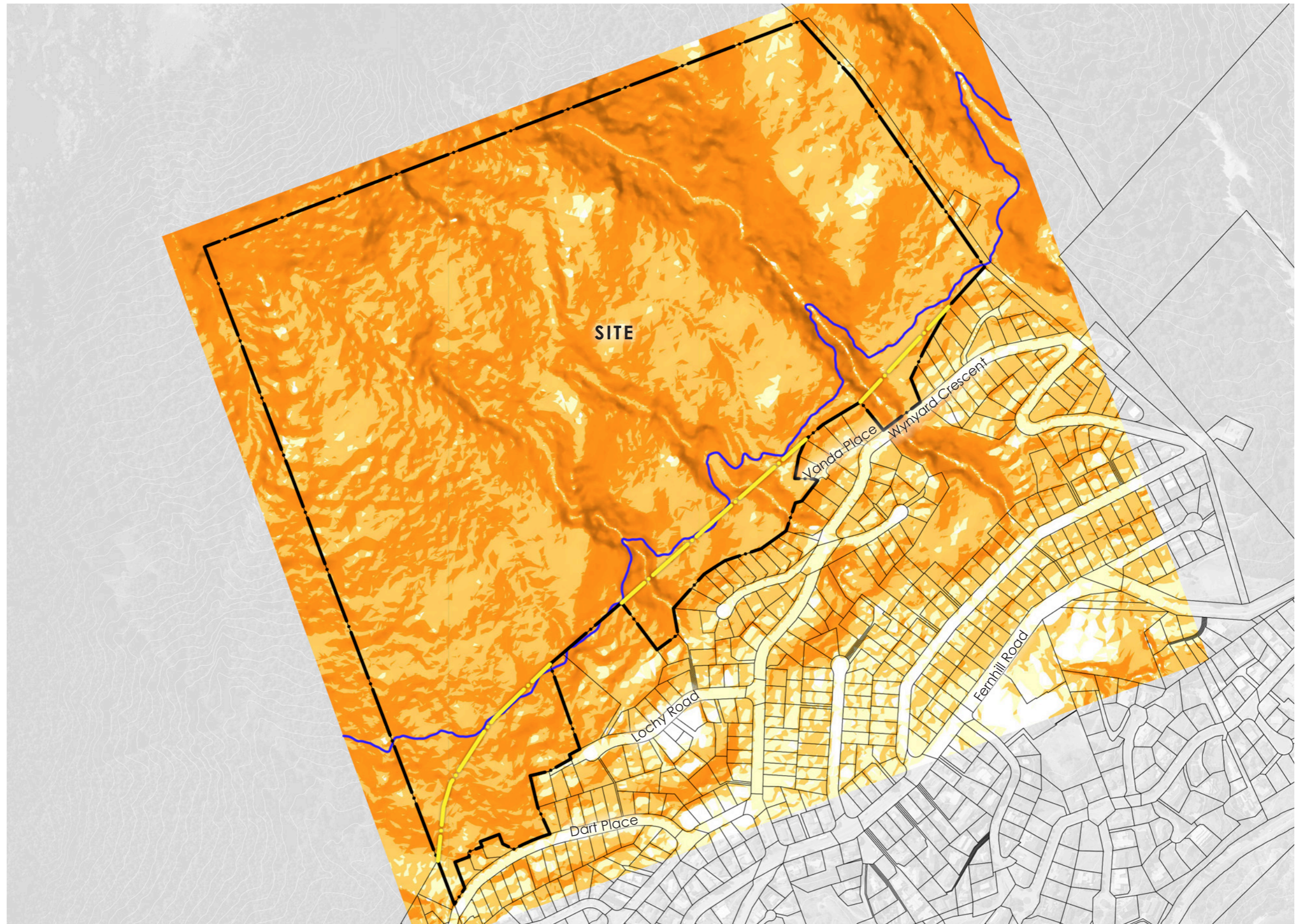
Rosie Hill  
Counsel for the Applicant

## Appendix 1 – Slope analysis

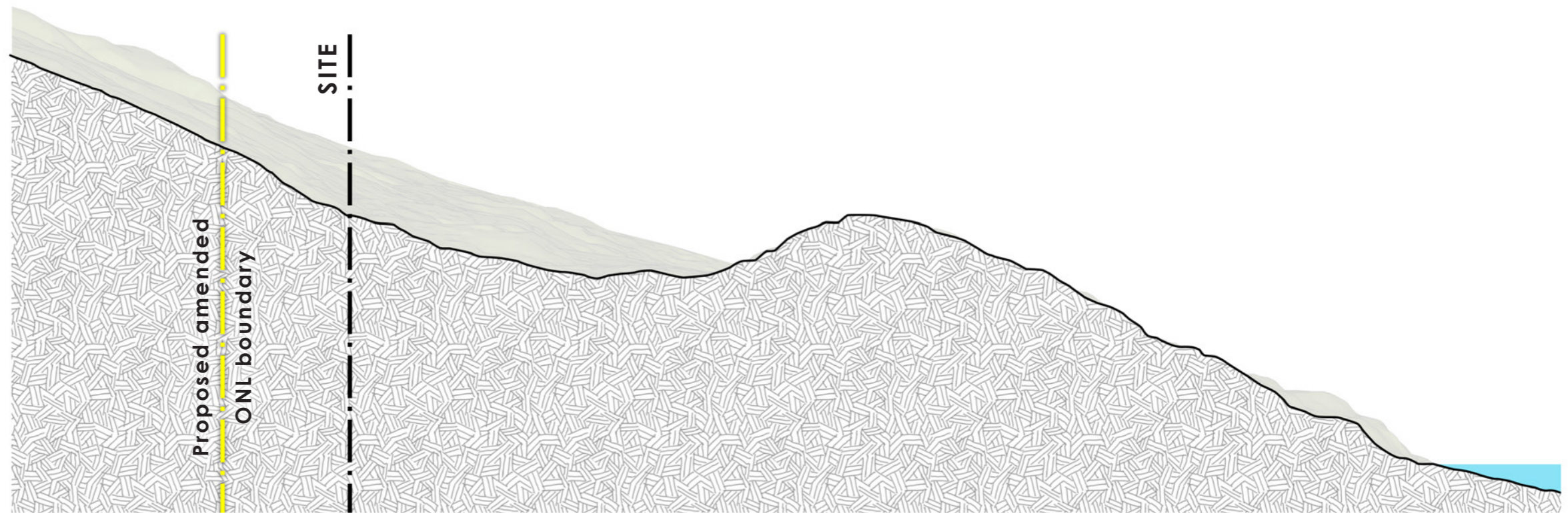


**Key:**

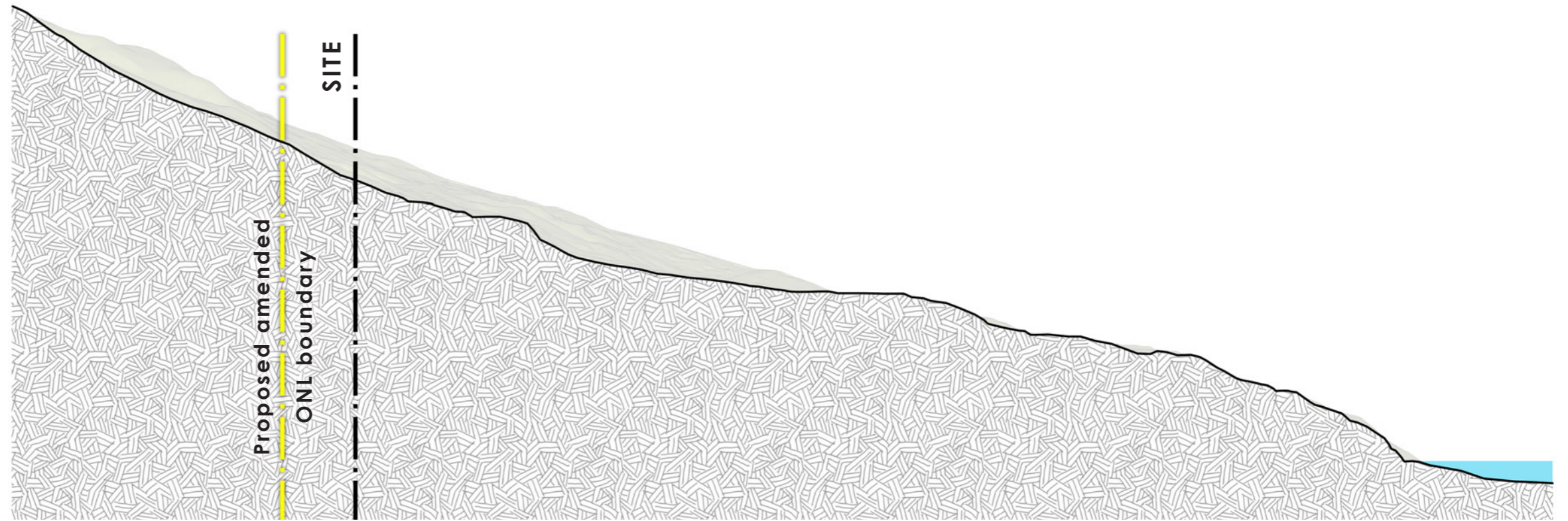
-  Slope > 1:2
-  1:5 < slope ≤ 1:2
-  1:12 < slope ≤ 1:5
-  Slope ≤ 1:12
-  Proposed amended ONL boundary
-  560m contour





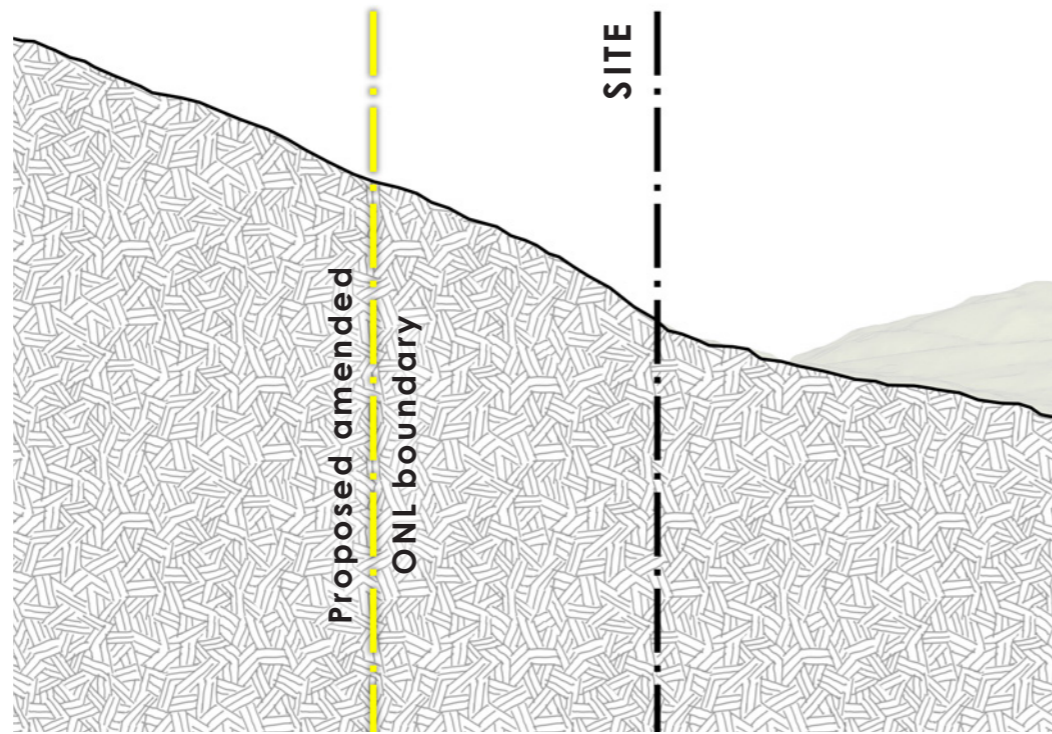


Section A

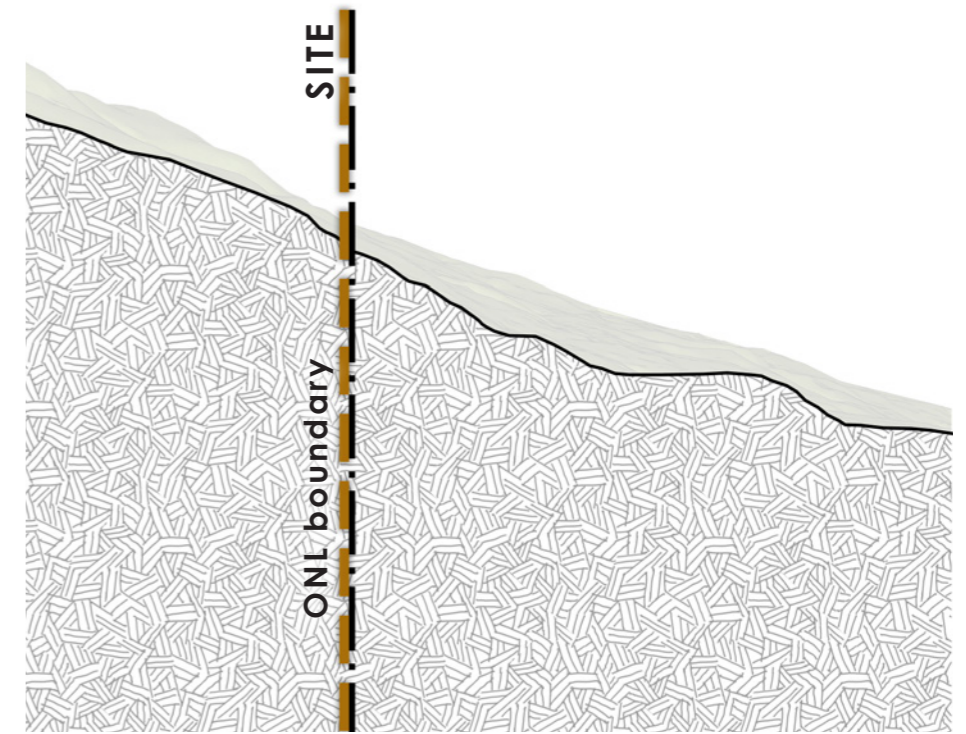


Section B





Section C



Section D