

BEFORE THE HEARING PANEL

UNDER

the Resource Management Act 1991 ("Act")

IN THE MATTER OF

a variation to Chapter 21 Rural Zone of the Proposed Queenstown Lakes District Plan to introduce Priority Area Landscape Schedules 21.22 and 21.23)

MEMORANDUM OF COUNSEL FOR HAWTHENDEN LIMITED

Date: 20 November 2023

Counsel:

Nathan Graham

Race Douglas Burke Limited

PO Box 538

Dunedin 9054

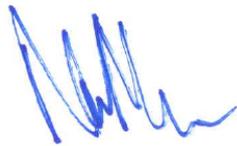
03 477 347

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MAY IT PLEASE THE PANEL

1. Following up on the Commissioners' request to Hawthenden Limited's expert witnesses at the 9 November 2023 Wanaka hearing, please find appended to this Memorandum:
 - a. Slope Analysis diagram outlining the geological/geomorphological contact between the 'Mount Alpha face' and the 'Alpha fan alluvials' in respect of the Hawthenden Land (and as consistently applied by QLDC in respect of ONL delineation throughout the Mount Alpha Priority Area, apart from the Hawthenden Land) as prepared by Mr Stephen Leary, Geologist (included as 'Appendix A'); and
 - b. Proposed ONL boundary delineation in respect of the Hawthenden Land (and the Mount Alpha Priority Area, in general) as prepared by Ms Nicola Smetham, Landscape Architect, in support of Ms Smetham's and Mr Leary's expert witness submissions presented at the hearing on 9 November 2023 (included as 'Appendix B').

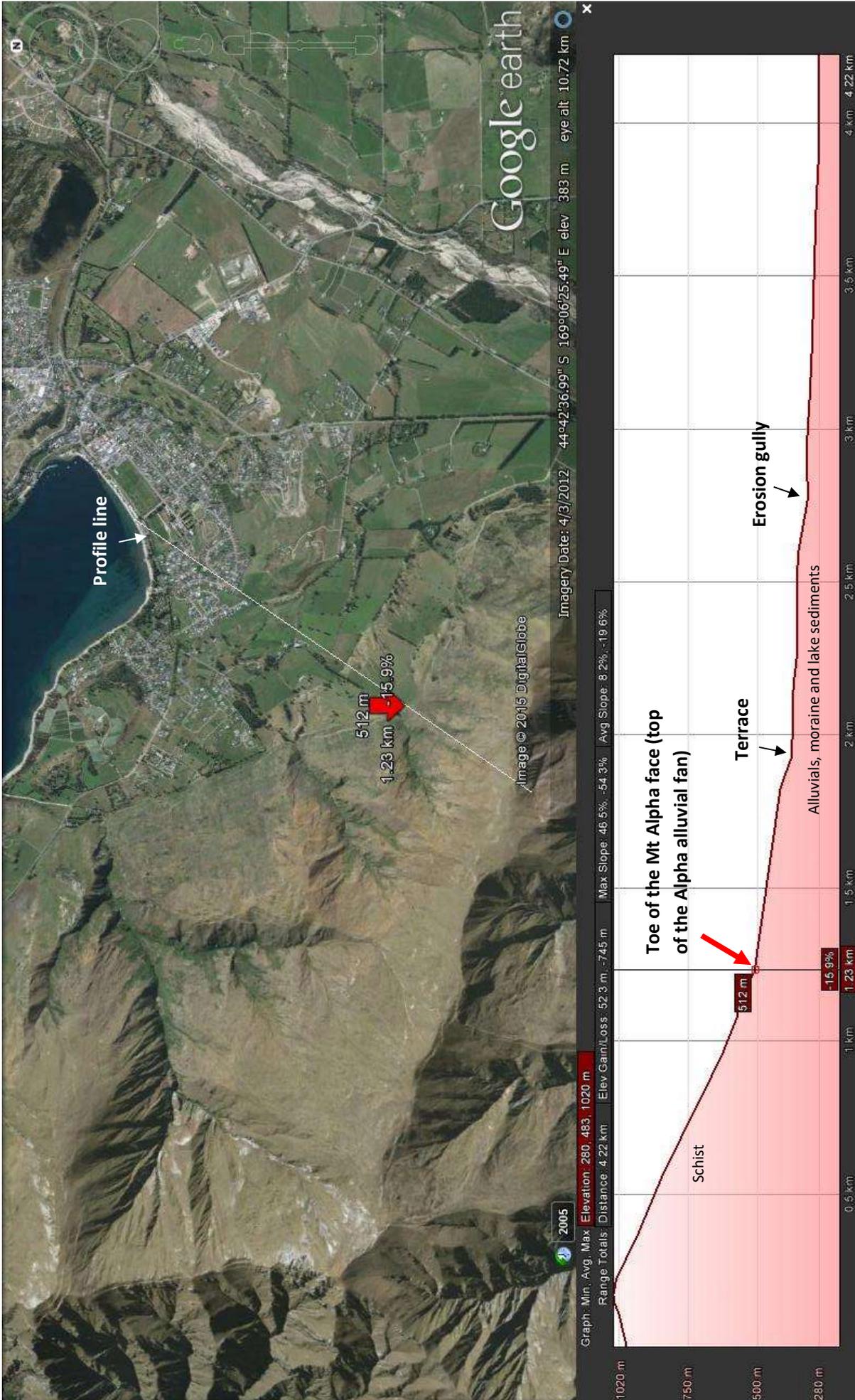
Date: 20 November 2023



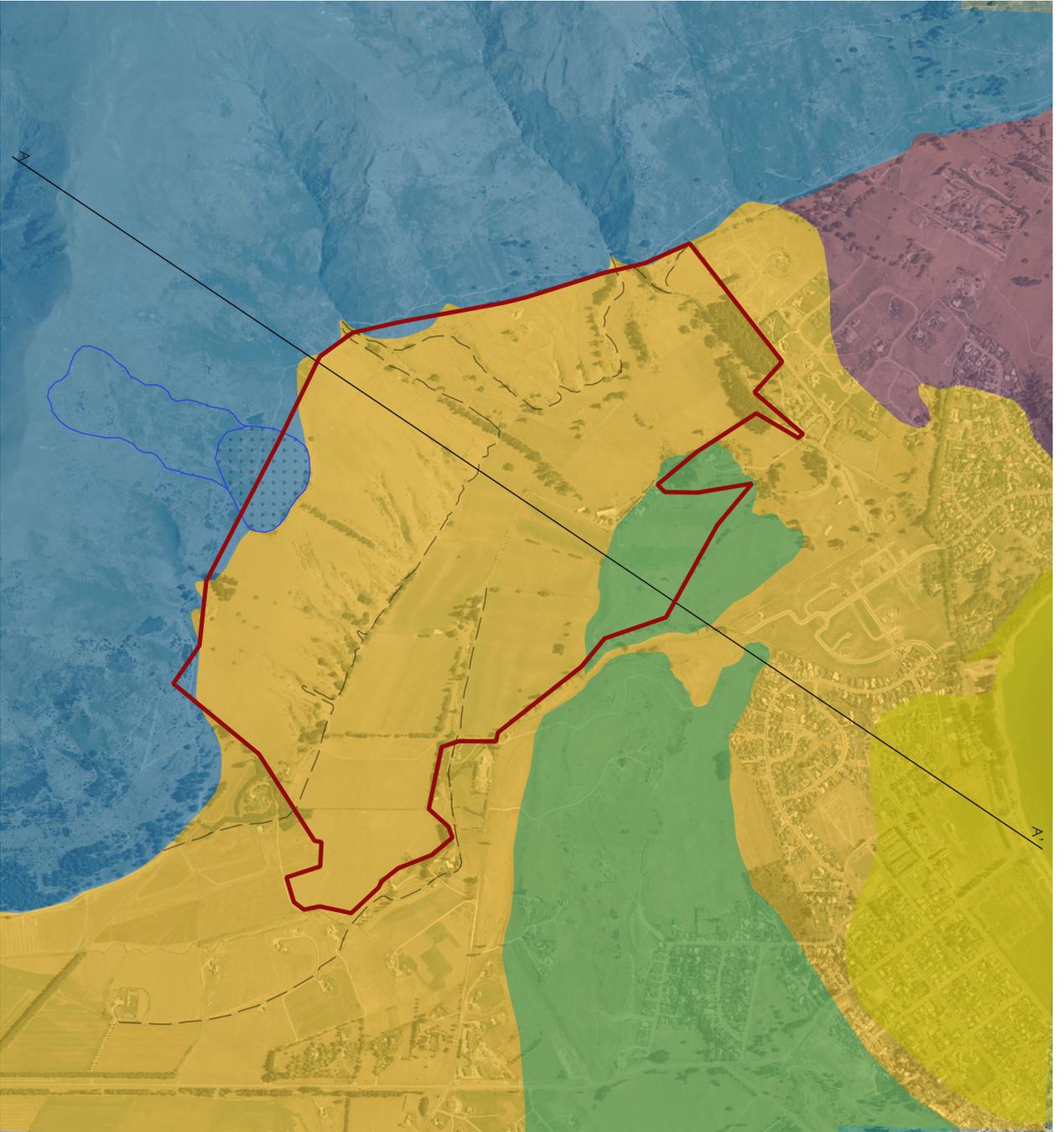
Nathan Graham

**FOR AND BEHALF OF
HAWTHENDEN LIMITED**

'Appendix A'



'Appendix B'



MT ALPHA ONL BOUNDARY APPEAL | ENV-2018-CHC-055

rough & milne landscape architects

Data Source: GEOLOGIST STEVE LEARY

Scale: Approx. 1:20000 @ A3

The lines drawn over these maps and photographs are an estimated interpretation of where the lines might exist on the ground. The location of boundaries and other lines drawn have been derived from overlapping QLDC supplied GIS data on a georeferenced aerial photograph, and interpreted the lines in relation to actual landscape features visible on the photograph, but appear visible on the map. These images should not be treated as indicative only.
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Legend

- Hawthenden Farm Boundary
- Crosssection line
- Alluvial Terraces
- Landslide
- Lake deposits
- Schist
- Moraine
- Alluvials
- Undifferentiated alluvials and moraine

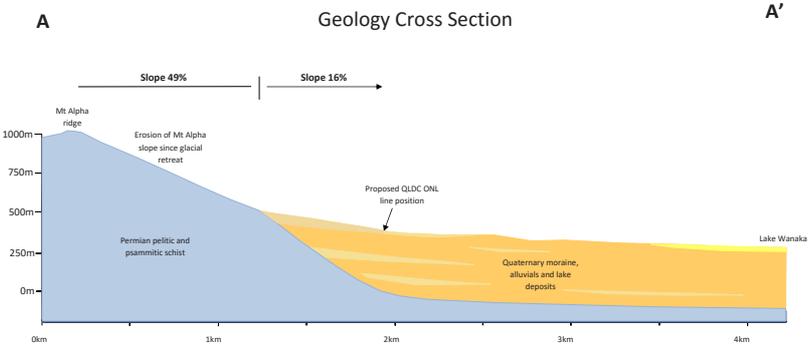


Figure 2. Geology cross section from the Mt Alpha ridge across the Hawthenden farm to Lake Wanaka, view looking NW. For location refer to figure 1.

Map 4 : Geology Map

MT ALPHA ONL BOUNDARY APPEAL | ENV-2018-CHC-055

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Prepared for Hawthenden Ltd by Ms Nikki Smetham | 2 November 2018
 Authors: Nicola Smetham, Hannah Ayres
 Peer Reviewed: Peter Rough



Google earth

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MT ALPHA ONL BOUNDARY APPEAL | ENV-2018-CHC-055

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Data Source: GOOGLE EARTH IMAGE WITH QLDC MAPS OVERLAY
Scale: Approx. 1:15000 @ A3



Map 5 : Existing and Proposed ONL Boundary Position

MT ALPHA ONL BOUNDARY APPEAL | ENV-2018-CHC-055
Prepared for Hawthenden Ltd by Ms Nikki Smetham | 2 November 2018

Authors: Nicola Smetham
Hannah Ayres
Peer Reviewed: Peter Rough

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