

**Before the Hearings Panel appointed by
the Queenstown Lakes District Council**

Under

the Resource Management Act
1991

And

In the Matter of

a proposed variation to the
Queenstown Lakes Proposed
District Plan – Urban Intensification
Variation

**Memorandum of Counsel
for John O’Shea, Helen Russell, John
Russell and Mary-Louise Stiassny –
Submitter 198**

Dated: 10 July 2025

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INTRODUCTION

1. This memorandum responds to Direction 16.2 (Hearing Panel Site Visits) in Minute 1 issued by Queenstown Lakes District Council (**QLDC**) in relation to the Urban Intensification Variation (**Variation**).
2. This memorandum is filed on behalf of John O'Shea, Helen Russell, John Russell and Mary-Louise Stiasny (**Submitters**). The Submitters have been assigned the number Submitter 198 by QLDC.

SITE VISIT LOCATIONS

3. The Submitters request that the Hearing Panel undertake a site visit to the Submitters' property and surrounds in Wānaka to view the presence of groundwater springs and Bullock Creek weaving through urban land subject to the Variation. A site visit would also provide more context to the example (Belvedere Apartments) of a more intensively developed site in the Variation area which has had adverse effects on groundwater.¹
4. The Submitters request that the Hearing Panel visit the following locations which correspond with the locations on the map at **Appendix A**:
 - (a) **A**: From Warren Street facing north, view the eastern side of Belvedere Apartments noticing the excavation depth compared to the Wanaka Springs to the east.
 - (b) **B**: From Warren Street facing north, view the western side of the Belvedere Apartments again noticing the excavation depth, in particular the basement depth at the northern end of the site, and Bullock Creek running alongside the north-western boundary.
 - (c) **C**: From Warren Street facing north, view Bullock Creek running through residential properties.
 - (d) **D**: From Warren Street facing south, view Bullock Creek running through residential properties and along road reserve.
 - (e) **E**: From Helwick Street, view Bullock Creek running through residential properties to the east and west.

¹ As described in the evidence of Mr Neil Thomas dated 4 July 2025 and Mr John Russell dated 8 July 2025 filed on behalf of Submitter 198.

- (f) **F:** From Tenby Street, view Bullock Creek running through residential properties to the north and south.
- (g) **G:** Suggest parking vehicle here at the Submitters' property located at 3/61 Stratford Terrace.
- (h) **H:** Walk from driveway following red dashed line around to the north side of the Submitter's property and down the stairs to the pond marked at location B in Appendix A. This is the pond referred to in the evidence of Mr John Russell² and Mr Neil Thomas.³ Following the red dashed line will ensure the Panel remain on the Submitters' property.

Dated this 10th day of July 2025



Joshua Leckie / Hayley Mahon
Counsel for John O'Shea, Helen
Russell, John Russell and Mary-
Louise Stiassny

² Evidence of John Russell dated 8 July 2025 at [16].

³ Evidence of Neil Thomas dated 4 July 2025 at [33].

APPENDIX 1: SITE VISIT MAPS FOR SUBMITTER 198

