

**From:** [Blair Devlin](#)  
**To:** [RPS](#)  
**Subject:** Submission of Tussock Rise Ltd  
**Date:** Friday, 3 September 2021 8:36:55 a.m.  
**Attachments:** [Tussock Rise Ltd - Submission on proposed Otago RPS 2021.pdf](#)

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Kind regards,  
Blair

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Blair Devlin MRRP, MNZPI | Director / Senior Planner | Vivian + Espie Ltd

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**Working remotely**

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# Written Submission on Proposed Otago Regional Policy Statement 2021

*(Submissions must be received by Otago Regional Council by 3 pm Friday 3 September 2021)*

## To: Otago Regional Council

1. **Name of submitter** *(full name of person/persons or organisation making the submission. Note: The submissions will be referred to by the name of the submitter)*

Tussock Rise Limited

2. This is a submission on the **Proposed Otago Regional Policy Statement 2021**.
3. I **could not** gain an advantage in trade competition through this submission. *(See notes to person making submission)*
4. I **am** directly affected by an effect of the subject matter of the submission that
- a. adversely affects the environment; and
  - b. does not relate to trade competition or the effects of trade competition *(See notes to person making submission)*
5. I **wish** to be heard in support of my submission
6. If others make a similar submission, I **will** consider presenting a joint case with them at a hearing
7. **Submitter Details**

- a. **Signature of submitter** *(or person authorised to sign on behalf of submitter)*



- b. **Signatory name, position, and organisation** *(if signatory is acting on behalf of a submitter organisation or group referred to at Point 1 above)*

*Name* Blair Devlin

*Position* Director / Senior Planner

*Organisation* Vivian and Espie Limited

**c. Date**

2 September 2021

**Address for service of submitter** (This is where all correspondence will be directed)

**d. Contact person** (name and designation, if applicable)

Blair Devlin

**e. Email:**

blair@vivianespie.co.nz

**f. Telephone:**

03 441 4189 or 021 222 6393

**g. Postal address** (or alternative method of service under [section 352](#) of the Act):

PO Box 2514, Wakatipu, Queenstown 9349

**8. My submission is:**

Column 1	Column 2	Column 3	Column 4
<p><i>The <b>specific provisions</b> of the proposal that my submission relates to are:</i></p> <p><i>(Please enter the relevant objective, policy, method, or 'other' provision reference where possible. For example, 'AIR-01'.)</i></p>	<p><i>I <b>support</b> or <b>oppose</b> the specific provisions or wish to have them <b>amended</b>.</i></p> <p><i>(Please indicate "support" or "oppose" or "amend")"</i></p>	<p><i>The <b>reasons</b> for my views are:</i></p>	<p><i>I seek the following <b>decision</b> from the local authority:</i></p> <p><i>(Please be as clear as possible – for example, include any alternative wording for specific provision amendments.)</i></p>
<p><b>UFD-01</b> – Form and function of urban areas</p>	<p><i>I <b>support</b> the specific provisions</i></p>	<p>UFD-01 recognises that the form and function of urban areas will change, now</p>	<p>Retain the objective and ensure it recognises that urban areas will change</p>

		and in the future, to meet the changing needs of Otago's people and communities. It is important this policy recognises the need for urban form to change in areas with growth.	and grow, including industrial areas that have become surrounded by residential activity.
<b>UFD-O2</b> – Development of urban areas	<i>I support the specific provisions</i>	UFD-02 is positive as it provides matters (1) – (11) that help guide whether an urban change is acceptable.	Retain the objective and ensure it recognises that urban areas will change and grow, including industrial areas that have become surrounded by residential activity.
<b>UFD-O3</b> – Strategic Planning	<i>I wish to have the specific provisions amended.</i>	<p>UFD-03 is unclear as to what would qualify as 'significant'.</p> <p>With regard to who is to do the strategic planning, UFD-M1 makes it clear this is the role of the ORC and territorial authorities but does not anticipate private plan changes and whether a separate strategic planning exercise (for example by the proponent of a private plan change) could be undertaken. By their nature, most private plan changes will not be anticipated by strategic plans but are able to go through a private plan change process.</p> <p>Clause (3) of the policy is unclear and uncertain as there is no clear definition of mana whenua values and aspirations, which vary between Rūnaka.</p>	<p>Amend the objective to make it clear the proponent of a private plan change can also do strategic planning as part of providing for a competitive land market and increasing housing supply.</p> <p>Remove Clause (3) of the objective as the reference to values and aspirations is unclear and lacks meaning.</p>
<b>UFD-P1</b> – Strategic Planning	<i>I wish to have the specific provisions amended.</i>	The policy does not explain who is to do the strategic planning processes, and whether this refers to formal strategic	Amend the policy to make it clear who is to do the strategic planning, and whether this refers to formal strategic plans

		plans prepared by local authorities or a separate strategic planning exercise (for example by the proponent of a private plan change).	prepared by local authorities or a separate strategic planning exercise (for example by the proponent of a private plan change). Due to the extremely slow timeframes for preparing and amending a strategic plan a more agile approach is required as with UFD-P2(5), to address supply of business mixed use land.
<b>UFD-P2 – Sufficiency of development capacity</b>	<i>I wish to have the specific provisions amended.</i>	The word ‘sufficient’ will not help address the shortage of business mixed use land in Wanaka or the housing crisis being experienced in New Zealand. This also recognises land zoned for housing does not necessarily get developed for housing, yet appears as part of development capacity calculations. i.e. a zoning is not actually capacity.	Replace the word ‘Sufficient’ with ‘Significant’ or ‘More than sufficient’.  Support UFD-P2(5) is fully supported as it enables a more agile approach to increasing development capacity as soon as practicable.
<b>UFD-P3 – Urban Intensification</b>	<i>I support the specific provisions</i>	Intensification should be encouraged. Business Mixed Use is a particularly effective way to provide for urban intensification and a well-functioning urban environment.	Retain the policy.
<b>UFD-P5 – Commercial Activities</b>	<i>I support the specific provisions</i>	The Ballantyne Road area in Wanaka is a commercial area that is highly accessible for future public transport provision in Wanaka and by active transport.	Retain the policy.
<b>UFD-P6 – Industrial Activities</b>	<i>I support the specific provisions</i>	The Ballantyne Road area in Wanaka falls into the category described in Clause (4) of the policy. It is already a very mixed use environment and is experiencing high demand for other urban activities. This area needs to be managed in its transition to a business mixed use environment.	Retain the policy.

<p><b>UFD-P10</b> – Criteria for significant development capacity</p>	<p><i>I wish to have the specific provisions amended.</i></p>	<p>The policy recognises that proposed plan changes are a key part of meeting development capacity.</p>	<p>Retain the policy but amend clauses (4) and (5) to also enable a smaller or moderate contributions. Having a large number of smaller or moderate contributions better achieves a competitive land market for Business Mixed Use zoning rather than putting all of the supply into one or two developers hands.</p>
<p><b>UFD-M2</b> – District Plans</p>	<p><i>I wish to have the specific provisions amended.</i></p>	<p>Amend (1)(a) and (b) of the method to allow for departures from the future development strategy and a local authority adopted strategic plan at the discretion of the local authority.</p>	<p>Provide for greater flexibility by amending (1)(a) and (b) of the method to allow for departures from the future development strategy and a local authority adopted strategic plan at the discretion of the local authority. These documents are slow to adopt and change and a more agile approach is needed allowing site specific considerations.</p>
<p><b>All of the above provisions</b></p>	<p><i>I wish to have the specific provisions amended.</i></p>	<p>Consequential relief.</p>	<p>Make further amendments necessary to improve the clarity and workability of the provisions to achieve the purpose of the submission and to enable business mixed use zoning as a method to achieve intensification.</p>