

From: [Blair Devlin](#)
To: [RPS](#)
Subject: Submission of Sipka Holdings Ltd
Date: Friday, 3 September 2021 9:30:06 a.m.
Attachments: [Sipka Holdings Ltd - Submission on proposed Otago RPS 2021.pdf](#)

Please find attached the submission of Sipka Holdings Ltd.

Kind regards,
Blair

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

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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)*

Sipka Holdings 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:

<i>Column 1</i>	<i>Column 2</i>	<i>Column 3</i>	<i>Column 4</i>
<i>The specific provisions of the proposal that my submission relates to are:</i>	<i>I support or oppose the specific provisions or wish to have them amended.</i>	<i>The reasons for my views are:</i>	<i>I seek the following decision from the local authority:</i>
Urban Area definition	<i>I support the specific provisions</i>	Support the definition as it includes land “that is, <u>or intended to be</u> , predominantly urban in character”. The definition enables private plan changes to be considered.	Retain the definition and reference to areas intended to be predominantly urban in character.

<p>UFD-O1 – Form and function of urban areas</p>	<p><i>I support the specific provisions</i></p>	<p>UFD-01 recognises that the form and function of urban areas will change, now 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 expand in areas with growth.</p>	<p>Retain the objective and ensure it recognises that urban areas will change and grow.</p>
<p>UFD-O2 – Development of urban areas</p>	<p><i>I support the specific provisions</i></p>	<p>UFD-02 is positive as Clause (1) recognises sustainable development can occur in and around urban areas.</p>	<p>Retain the objective.</p>
<p>UFD-O3 – Strategic Planning</p>	<p><i>I wish to have the specific provisions amended.</i></p>	<p>UFD-03 is unclear as to who is to do the strategic planning, and how this Objective would apply to a private plan change scenario.</p> <p>Clause (3) of the policy is unclear and uncertain as there is no clear definition of values and aspirations.</p>	<p>Amend the objective to make it clear strategic planning can be the formal strategic plans prepared by local authorities or a separate strategic planning exercise (for example by the proponent of a private plan change).</p> <p>Delete Clause (3) of the objective as the terms ‘values’ and ‘aspirations’ are not suitable in an objective as they are too uncertain.</p>
<p>UFD-O4 – Development in Rural Areas</p>	<p><i>I wish to have the specific provisions amended.</i></p>	<p>Clause (3) of the Objective requires amendment. The reference to urban expansion on zoned land does not make sense as if it is zoned for urban purposes then it would not come under the expansion objective which is for rural areas. With regard to the strategic planning reference in Clause (3), it is unclear if a separate strategic planning exercise (for example by the proponent of a private plan change) can be undertaken. Private plan changes are inevitably by</p>	<p>Amend this objective to make it clear who can do the strategic planning, and whether this refers to formal strategic plans prepared by local authorities or a separate strategic planning exercise (for example by the proponent of a private plan change). Provide for private plan changes as a mechanism for</p> <p>Amend Clause (3) to remove reference to areas already zoned for urban expansion, rural lifestyle, and rural residential</p>

		<p>their nature not consistent with a District Plan or Strategic Plan which is why the zoning is being sought to be changed.</p> <p>Clause (4) of the Objective requires amendment. This clause would prevent the policy UFD-P4 from being implemented as an urban expansion provide for under UFD-P4 will inevitably not maintain and enhance rural character.</p>	<p>development, because under the definition of Urban Area they would not be captured by this objective which is titled 'Development in Rural Areas'.</p> <p>Amend Clause (4) so that it is consistent with policy UFD-P4 and so it will enable urban expansion, which by its very nature, will not maintain and enhance rural character but rather recognise that change will occur as part of urbanisation.</p>
UFD-O5 – Urban development and climate change	<i>I support the specific provisions</i>	It focuses on adapting to the impacts of climate change, rather than trying to manage emissions on a consent-by-consent basis.	Retain the objective.
UFD-P1 – Strategic Planning	<i>I wish to have the specific provisions amended.</i>	<p>The policy should be amended so that it is consistent with policy UFD-P4 and so it will enable urban expansion, even if not fully anticipated by strategic planning documents which are high level and 'coarse' in terms of their site-specific detail.</p> <p>The policy does not explain who is to do the strategic planning processes, and whether this refers to formal strategic plans prepared by local authorities or a separate strategic planning exercise (for example by the proponent of a private plan change).</p>	<p>Amend the policy so that it is consistent with policy UFD-P4 and so it will enable urban expansion, even if not fully anticipated by strategic planning documents which are high level and 'coarse' in terms of their site-specific detail.</p> <p>Amend the policy to make it clear who is to do the strategic planning, and whether this refers to formal strategic plans prepared by local authorities or a separate strategic planning exercise (for example by the proponent of a private plan change).</p>

<p>UFD-P2 – Sufficiency of development capacity</p>	<p><i>I wish to have the specific provisions amended.</i></p>	<p>The word ‘sufficient’ will not help address 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.</p>	<p>Replace the word ‘Sufficient’ with ‘Significant’ or ‘More than sufficient’.</p>
<p>UFD-P3 – Urban Intensification</p>	<p><i>I support the specific provisions</i></p>	<p>Intensification should be encouraged.</p>	<p>Retain the policy.</p>
<p>UFD-P4 – Urban Expansion</p>	<p><i>I wish to have the specific provisions amended.</i></p>	<p>Generally support the policy, however the wording of clause (7)(c) does not read well. Clause (7)(c) could just be part of (b) as an either / or type policy.</p>	<p>Support the policy but amend wording of clause 7(c) to read better, it could just be part of (b) as an either / or type policy.</p>
<p>UFD-P7 – Rural Areas</p>	<p><i>I wish to have the specific provisions amended.</i></p>	<p>It is unclear how this policy relates to UFD-P4 and the definition of urban areas. The two policies and the definition need to be carefully worded to ensure they are not in conflict, as most urban extensions will occur on rural land. The definition of ‘urban areas’ includes land “that is, or intended to be, predominantly urban in character”. E.g., at present an urban extension in accordance with UFD-P4 would run into issues with UFD-P7 as the land for the urban expansion may be zoned rural but can fall within the definition of an urban area as it is “intended to be, predominantly urban in character”. i.e., land on the edge of town could fall within both the ‘rural areas’ and urban areas’ definition.</p>	<p>Amend the policy to recognise in UFD-P7 that UFD-P4 could mean that rural areas change to urban areas as part of achieving UFD-P4.</p> <p>Amend the policy to enable logical urban extensions into Rural areas as part of a well-functioning urban environment.</p>

<p>UFD-P10 – 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 clause (5) to also enable smaller contributions. Having a large number of smaller contributions better achieves a competitive housing market rather than putting all of the supply under the control of one or two landowners. This is particularly the case in Queenstown where there is a large amount of zoned land but large areas of capacity are held by a small number of landowners.</p>
<p>All of the above provisions</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.</p>