

PLAN CHANGE 1 – MINOR IMPROVEMENTS

SUBMISSION FORM 5

CLAUSE 6 OF FIRST SCHEDULE, RESOURCE MANAGEMENT ACT 1991



This is a submission on Plan Change 1 to the Partially Operative Dunedin City Second Generation District Plan (2GP). Your submission must be lodged with the Dunedin City Council by midnight on 18 December 2024. All parts of the form must be completed.

Privacy

Please note that submissions are public. Your name, organisation, contact details and submission will be included in papers that are available to the media and the public, including publication on the DCC website, and will be used for processes associated with Plan Change 1. This information may also be used for statistical and reporting purposes. If you would like a copy of the personal information we hold about you, or to have the information corrected, please contact us at dcc@dcc.govt.nz or 03 477 4000.

Make your submission

Online: dunedin.govt.nz/2gp-plan-change-1 **Email:** districtplansubmissions@dcc.govt.nz

Post to: Submission on Plan Change 1, Attn: City Development, Dunedin City Council, PO Box 5045, Dunedin 9054

Deliver to: Customer Services Agency, Attn: City Development, Dunedin City Council, Ground Floor, 50 The Octagon, Dunedin

Submitter details (You must supply a postal and/or electronic address for service)

First name: Kirsty

Last name: Shepherd

Organisation (if applicable): Health New Zealand Te Whatu Ora

Contact person/agent (if different to submitter): Maurice Dale

Postal address for service: C/- Boffa Miskell Limited, PO Box 110

Suburb:

City/town: Christchurch

Postcode: 8041

Email address: maurice.dale@boffamiskell.co.nz

Trade competition

Please note: If you are a person who could gain an advantage in trade competition through your submission, your right to make a submission may be limited by clause 6(4), Schedule 1 of the Resource Management Act.

I could gain an advantage in trade competition through this submission: Yes No

If you answered yes, you could gain an advantage in trade competition through this submission, please select an answer:

- Yes No My submission relates to an effect that I am directly affected by and that:
- adversely affects the environment; and
 - does not relate to trade competition or the effects of trade competition.

Submission

Submissions on Plan Change 1 can only be made on the provisions or mapping which are proposed to change, or alternatives that are clearly within the 'purpose of proposal and scope of change' statements for the related Change ID given in the Section 32 report and in the summary of changes document. Submissions on other aspects of the 2GP may not be considered by the hearing panel.

You must indicate which parts of the plan change your submission relates to. You can do this by identifying the relevant Change ID and either making a submission on:

- all changes related to that Change ID or alternatives within the associated 'purpose of proposal and scope of change'; or
- specific provisions that are being amended as part of that Change ID.

The specific aspects of Plan Change 1 that my submission relates to are:

Change ID (please see accompanying Plan Change 1 – Summary of Changes document, Section 32 Report, or find the list on www.dunedin.govt.nz/2gp-plan-change-1)

Refer to attached submission

For example: Res13

Provision name and number, or address and map layer name (where submitting on a specific proposed amendment):

Refer to attached submission

For example: Rule 9.5.4.4, or the stormwater open watercourse mapped area at 123 Street

My submission seeks the following decision from the Council: (Please give precise details, such as what you would like us to retain or remove, or suggest amended wording)

- Accept the change
- Accept the change with amendments outlined below
- Reject the change
- If the change is not rejected, amend as outlined below

Refer to attached submission

Reasons for my views (you may attach supporting documents):

If you wish to make multiple submissions, you can use the submission table on page 3 or attach additional pages.

Refer to attached submission

Hearings

Do you wish to speak in support of your submission at a hearing: Yes No

If others make a similar submission, would you consider presenting a joint case at a hearing: Yes No

Signature:

K. Shepherd

Date:

18/12/2024

Multiple Submissions Table

Change ID, and provision name and number or address and map layer name where submitting on a specific provision being amended by that Change ID

Decision Sought

- a. Accept the change
- b. Accept the change with amendments outlined
- c. Reject the change
- d. If the change is not rejected, amend as outlined

Reasons for my views

Change ID, and provision name and number or address and map layer name where submitting on a specific provision being amended by that Change ID	Decision Sought	Reasons for my views
Refer to attached submission		

**HEALTH NEW ZEALAND TE WHATU ORA
SUBMISSION ON PLAN CHANGE 1 TO THE PARTIALLY OPERATIVE
DUNEDIN CITY SECOND GENERATION DISTRICT PLAN**

Clause 6 of First Schedule, Resource Management Act 1991

To: Submission on Plan Change 1
Dunedin City Council
Dunedin 9054

Email: districtplansubmissions@dcc.govt.nz

Submitter: Health New Zealand Te Whatu Ora
C/- Boffa Miskell Limited
P O Box 110
Christchurch 8140

Attention: Maurice Dale
Phone: 027 801 8072
Email: maurice.dale@boffamiskell.co.nz

Health New Zealand Te Whatu Ora (**Health NZ**) makes submissions on Plan Change 1 (**PC1**) to the Partially Operative Dunedin City Second Generation District Plan (**2GP**) in the **attached** document.

Health NZ confirms it could not gain an advantage in trade competition through this submission.

Health NZ would like to be heard in support of its submission. If other submitters make a similar submission, Health NZ will consider presenting a joint case with them at a hearing.

Kirsty Shepherd, Principal Legal Counsel

On behalf of Health NZ Te Whatu Ora

Dated this 18th day of December 2024

Introduction

Health New Zealand Te Whatu Ora (**Health NZ**) is responsible for the provision and improvement of health care services and outcomes across the health system to meet the needs of all people in New Zealand. Health NZ manages all health services, including hospital and specialist services, and primary and community care. The services it provides are essential and directly enable people and communities to provide for their social and cultural wellbeing, and health and safety in a way that contributes to the sustainable management purpose of the Resource Management Act 1991 (**RMA**).

Within Ōtepoti Dunedin, Health NZ operates Dunedin Hospital located at 201 Great King Street and Wakari Hospital located at 371 Taieri Road. Dunedin Hospital is the tertiary hospital for the lower part of the South Island and provides a range of services for a catchment of 289,000 people. Dunedin Hospital is also a University teaching hospital with links to the University of Otago and the Otago Polytechnic Schools of Nursing, Midwifery and Health Sciences. Wakari hospital provides psychiatric hospital services and services for people with intellectual or physical disabilities.

Health NZ is also leading the delivery of Project Whakatuputupu, the New Dunedin Hospital (**NDH**). The project involves the construction of new tertiary inpatient and outpatient facilities across three blocks located at 280 and 360 Cumberland Street, and 81 Castle Street. The Outpatient building is currently under construction.

Health NZ has an interest in the implications that Plan Change 1 (**PC1**) has on the development, use, and upgrading of hospitals and healthcare facilities in Dunedin. This submission relates to changes proposed through PC1 that would result in the listing of 255 Great King Street as a scheduled heritage building in Partially Operative Dunedin City Second Generation District Plan (**2GP**), and other changes that may impact on Health NZ's ability to deliver cost effective and efficient health care services.

Health NZ Submission on Plan Change 1

The Listing of 255 Great King Street as a Scheduled Heritage Building

The Aspects of Plan Change 1 the Submission Relates to:

Change ID: SHB3

Provision name and number of address and map layer name: Planning Maps (scheduled heritage buildings), and Appendix A1.1 Schedule of Protected Heritage Items and Sites.

Submission

PC1 proposes to include the Dunedin Hospital Administration Block (former) located at 255 Great King Street as a scheduled heritage building (reference BX055) on the Planning Maps and in Appendix A1.1 Schedule of Protected Heritage Items and Sites. The heritage protection proposed to be afforded to the building includes the entire external building envelope and central interior stair. Scheduling of the building is proposed on the basis that it meets one or more of the significance criteria in policy 2.4.2.1.b of the 2GP.

Health NZ **opposes** the listing of 255 Great King Street as a scheduled heritage building for the following reasons:

- Hospitals provide essential services and significant public benefits. Given their various operational and functional requirements and the changing needs of the populations they serve, the design, delivery and management of hospitals is uniquely complex and extremely costly. It is critical that health buildings are able to adapt to changing needs in a cost-effective and efficient manner.
- Site wide master planning for hospital campuses identifies the most feasible and appropriate way in which the future use and development of land and buildings around a hospital will be undertaken. In Dunedin, the proposed scheduling and protection afforded to a hospital in the middle of the current health precinct will create significant issues with the ability to make the best use of that site in future.

- It does not consider that the heritage values of the building are of the level of significance to warrant inclusion in the Heritage Schedule.
- At this stage, given the above, it is considered that the costs associated with scheduling the building are not outweighed by the benefits of protecting any heritage values it may have. The scheduling of the building is therefore not the most appropriate way to achieve the objectives of the 2GP and the purpose of the RMA.

Decision Sought from Council

- (a) Delete scheduled heritage building BX055, 255 Great King Street, from the Planning Maps and Appendix A1.1 Schedule of Protected Heritage Items and Sites.

Other Changes Proposed through PC1

The Aspects of Plan Change 1 the Submission Relates to:

Provision name and number of address and map layer name:

Provisions in the following chapters to the extent that they relate to the development, use, maintenance, and upgrading of hospitals and health care facilities:

- Chapter 1.4 – Definitions
- Chapter 2 – Strategic Directions
- Chapter 4 – Temporary Activities
- Chapter 5 – Network Utilities
- Chapter 6 – Transportation
- Chapter 8 – Earthworks
- Chapter 9 – Public Health and Safety
- Chapter 11 – Natural Hazards
- Chapter 12 – Heritage
- Chapter 18 – Commercial and Mixed Use Zones
- Chapter 19 – Industrial Zones
- Chapter 23 – Major Facility Dunedin Hospital Zone
- Chapter 35 – Major Facility Wakari Hospital Zone

Submission

Health NZ neither supports or opposes (is neutral) on all other changes proposed in PC1 that relate to the development, use, and upgrading of hospitals and health care facilities. Hospitals and health care facilities provide essential services and significant public benefits and have specific operational and functional requirements. Health NZ considers the provisions PC1 must enable hospitals and health care facilities to be developed, used, and upgraded to meet the needs of the populations they serve in a cost effective and efficient manner.

This includes (but is not limited to) ensuring the provisions of PC1:

- Provide for an appropriate range of health care services in the amended or new definitions of “hospital” and “healthcare”.
- Apply appropriate requirements to the management of noise, vibration, and other effects from construction and site investigation activities.

- Apply appropriate acoustic insulation requirements for noise sensitive activities.
- Enable high trip generators to establish while appropriately managing effects on the safe, effective, and efficient operation of the transport network.
- Enable hospitals and healthcare activities, including supporting and ancillary activities, in the Major Facility Dunedin Hospital Zone, Major Facility Wakari Zone, Commercial and Mixed Use Zones (particularly the CBC Edge Commercial North Zone), including appropriate built form, amenity, and transport outcomes.

Decision Sought from Council

- (a) Retain or amend the changes proposed through PC1 in the following chapters in a form that provides for the appropriate development, use, and upgrading of hospitals and health care facilities.
- Chapter 1.4 – Definitions
 - Chapter 2 – Strategic Directions
 - Chapter 4 – Temporary Activities
 - Chapter 5 – Network Utilities
 - Chapter 6 – Transportation
 - Chapter 7 – Scheduled Trees
 - Chapter 8 – Earthworks
 - Chapter 9 – Public Health and Safety
 - Chapter 11 – Natural Hazards
 - Chapter 12 – Heritage
 - Chapter 18 – Commercial and Mixed Use Zones
 - Chapter 19 – Industrial Zones
 - Chapter 23 – Major Facility Dunedin Hospital Zone
 - Chapter 35 – Major Facility Wakari Hospital Zone

Roxanne Davies

From: Peter Rawson
Sent: Wednesday, 18 December 2024 8:30 am
To: Roxanne Davies
Cc: Jane MacLeod
Subject: FW: Health New Zealand Te Whatu Ora submission to Plan Change 1 – Minor Improvements of the 2GP [GREE-ACTIVE.FID150854]

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Add to Sub

Hi Roxy,

I hope you're feeling OK.

I have got clarification from Health New Zealand's agent, refer below.

Can you please include this email as an attachment to the submission, as it will help with its summarising.

Thanks

Regards

Peter

[Peter Rawson](#)

**SENIOR PLANNER
CITY DEVELOPMENT**

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From: Maurice Dale <Maurice.Dale@boffamiskell.co.nz>

Sent: Tuesday, 17 December 2024 3:59 p.m.

To: Peter Rawson <Peter.Rawson@dcc.govt.nz>

Cc: Jane MacLeod <Jane.Macleod@dcc.govt.nz>

Subject: FW: Health New Zealand Te Whatu Ora submission to Plan Change 1 – Minor Improvements of the 2GP [GREE-ACTIVE.FID150854]

Hi Peter,

See below my responses in blue which hopefully provide the clarification sought.

Let me know if you have any other questions.

Kind regards
Maurice

Maurice Dale | Planner | Senior Principal

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From: Peter Rawson <Peter.Rawson@dcc.govt.nz>

Sent: Tuesday, December 17, 2024 2:29 PM

To: Maurice Dale <maurice.dale@boffamiskell.co.nz>

Cc: Jane MacLeod <Jane.Macleod@dcc.govt.nz>

Subject: Health New Zealand Te Whatu Ora submission to Plan Change 1 – Minor Improvements of the 2GP

You don't often get email from peter.rawson@dcc.govt.nz. [Learn why this is important](#)

Hi Maurice,

Thank you for the submission from Health New Zealand Te Whatu Ora to Plan Change 1 – Minor Improvements of the 2GP, which is attached to this email.

I am involved in summarising the decisions requested by Health New Zealand and have a few questions relating to the “Other Changes Proposed through PC1” part of this submission, which states:

Other Changes Proposed through PC1

The Aspects of Plan Change 1 the Submission Relates to:

Provision name and number of address and map layer name: Provisions in the following chapters to the extent that they relate to the development, use, maintenance, and upgrading of hospitals and health care facilities:

- Chapter 1.4 – Definitions
- ...

Submission

Health NZ neither supports or opposes (is neutral) on all other changes proposed in PC1 that relate to the development, use, and upgrading of hospitals and health care facilities. Hospitals and health care facilities provide essential services and significant public benefits and have specific operational and functional requirements. Health NZ considers the provisions PC1 must enable hospitals and health care facilities to be developed, used, and upgraded to meet the needs of the populations they serve in a cost effective and efficient manner. This includes (but is not limited to) ensuring the provisions of PC1:

- *Provide for an appropriate range of health care services in the amended or new definitions of “hospital” and “healthcare”. I assume this point relates to Providing for healthcare activities (Change D16). Correct. Does Health New Zealand seek retention or amendment of these provisions and of which ones? Retention of definitions of “hospital” and “healthcare”*
- *Apply appropriate requirements to the management of noise, vibration, and other effects from construction and site investigation activities. ”. I assume these points relate to; Geotechnical investigation and driving of piles for building foundations (Change Earth1) Correct, Construction vibration – Rule 4.5.4.1.b (Change TA3) Correct and Construction noise controls for long-term duration construction (Change PHS6) Correct. Also relates to Change NU2 Earthworks Setbacks from Network Utilities, and TA4 Off Site Storage and Offices for Construction and Temporary*

Works. Does Health New Zealand seek retention or amendment of these provisions and of which ones? Retention of all listed provisions for this change, except seek amendment of new construction vibration rules under change TA3.

- Apply appropriate acoustic insulation requirements for noise sensitive activities. I assume this point relates to Acoustic insulation for music venues noise management (Change PHS2) Correct. Does Health New Zealand seek retention or amendment of these provisions and of which ones? Retention of all listed provisions for this change.
- Enable high trip generators to establish while appropriately managing effects on the safe, effective, and efficient operation of the transport network. I assume this point relates to Integrated transport assessments for subdivisions (Change CP16). Incorrect, relates to Change CP1 Improvements to the Management of High Trip Generators Does Health New Zealand seek retention or amendment of these provisions and of which ones? Retention of all listed provisions for this change.
- Enable hospitals and healthcare activities, including supporting and ancillary activities, in the Major Facility Dunedin Hospital Zone, Major Facility Wakari Zone, Commercial and Mixed Use Zones (particularly the CBC Edge Commercial North Zone), including appropriate built form, amenity, and transport outcomes. I assume this point relates to Providing for healthcare activities (Change D16) Correct. Seek retention of all listed provisions for this change. The reference to “including appropriate built form, amenity, and transport outcomes” appears to be out of scope as there is no specific change related to this. Fair point – can ignore that.

Decision Sought from Council

- (a) Retain or amend the changes proposed though PC1 in the following chapters in a form that provides for the appropriate development, use, and upgrading of hospitals and health care facilities.
- Chapter 1.4 – Definitions

Generally my questions relate to providing greater clarity of which changes Health New Zealand’s submission relates to, there are approximately 80 different change numbers. In addition, whether Health New Zealand seeks to retain, amend or reject specific changes. I have included in red text what change and relief I think Health New Zealand submission seeks, refer above.

I refer to the s.32 report here: [Section-32-Report.pdf](#)

Can you please email me back or phone me to clarify. It would be helpful to have far more certainty of what changes (if any) Health New Zealand seeks.

Thank you.

Regards

Peter

Peter Rawson
SENIOR PLANNER
CITY DEVELOPMENT

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