

Ōtākou Health Limited

SUBMISSION TO PLAN CHANGE 1 - MINOR IMPROVEMENTS (DUNEDIN SECOND GENERATION DISTRICT PLAN)

TO: District Plan Submissions
Dunedin City Council
PO Box 5045
Dunedin 9054

BY EMAIL: districtplansubmissions@dcc.govt.nz

SUBMISSION ON: Submission on Plan Change 1 of the Partially
Operative Dunedin Second Generation
District Plan (2GP)

SUBMISSION SEEKS: Support Change D16 in relation to providing
for healthcare activities as part of Plan
Change 1

NAME OF SUBMITTER: Ōtākou Health Limited

SPEAK: Wishes to speak in support

ADDRESS FOR SERVICE: Ōtākou Health Limited
C/- SLR Consulting New Zealand Limited
426 Moray Place, Level 1
Dunedin 9016

Attention: Chris Pearse-Smith

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Mai i Whakahekerau ki Kawarau!

Nei rā te reo mihi ki a koutou

Koutou kā manawhenua nō Te Tai-o-Āraiteuru

Ko Kāi Te Ruahikihiki, Kāi Moki, Kāti Taoka

O Kāi Tahu, Kāti Māmoe me Waitaha hoki

E mihi atu nei

Nō reira

Tēnā koutou, tēnā koutou, tēnā tātou katoa

1.0 INTRODUCTION

- 1.1 Ōtākou Health Limited is a charity founded in 2015, with a vision to bring free and affordable health and social services to Dunedin.
- 1.2 Te Kāika, a village of integrated services dedicated to a holistic approach to improving and maintaining whānau wellbeing was founded by Ōtākou Health Limited (OHL) in March 2018 and has continued to provide low-cost healthcare and social services to Dunedin’s most vulnerable residents.
- 1.3 The Te Kāika Wellbeing Hub located at 25 College Street, Caversham was officially opened in May this year. The Hub provides a state of the art facility for wrap around health and social service providers to provide innovative and responsive services to the Dunedin community. The Te Kāika Wellbeing Hub was granted resource consent on 6 December 2021. This consent provided for the expansion of the existing wrap around services within a new purpose-built building and allowed for integration of existing Te Kāika services along with improved community support services provided by the Ministry of Social Development and the Southern District Health Board.
- 1.4 Ōtākou Health Limited also have greater interests in providing wrap around health and social care as well as accommodation for vulnerable members of the Dunedin community.
- 1.5 Ōtākou Health Limited has been engaged with Council on changes to the 2GP over the last two years, due largely to the difficulties experienced by the organisation in consenting Te Kāika Wellbeing Hub. Ōtākou Health Limited provided feedback to the Proposed 2GP Health-Related Activities on 28 February 2023. After this feedback was considered by DCC, further feedback was provided on 30 April 2024 upon request from Council. As a consequence, Ōtākou Health Limited has been heavily invested in ensuring that the 2GP better reflects and provides for a more enabling rule and policy framework to support Health-Related Activities.

2.0 SUBMISSION ON PLAN CHANGE 1

- 2.1 Ōtākou Health Limited supports the proposed changes to provide for healthcare activities under Change D16.
- 2.2 The changes are consistent with feedback that Ōtākou Health Limited provided to the Dunedin City Council in February 2023 and April 2024 which generally covered the following points:
 - a. The current definitions of the 2GP are too prescriptive making it difficult to identify what definition and activity status potential health related activities and ancillary activities fit within. This would often mean that certain health related activities would fall under non-complying activity statuses resulting in unnecessarily complex resource consent processes.
 - b. There are currently too many definitions governing health related activities resulting in unnecessary overlap and resulting in unintended definitions and activity statuses being invoked.
 - c. Council should consider whether a bespoke definition for ‘healthcare’ would be more transparent and simplify the consent process.
- 2.3 The feedback and Ōtākou Health Limited’s history with previous resource consents also identify that ‘healthcare hubs’ (hubs of wrap around health and social services from multiple entities/providers under one roof) are an emerging model of healthcare provision across New Zealand that need to be adequately provided for across multiple zones in Dunedin without significant planning constraints.

- 2.4 The key reasons for Ōtākou Health Limited's agreement of the healthcare activities changes are outlined below:
- a. Ōtākou Health Limited agrees with the inclusion of a new '*healthcare*' definition and the determined activity statuses '*healthcare*' within each respective zone as identified in Table 15.
 - b. Ōtākou Health Limited agrees with adding references specifically to recognise '*healthcare hubs*' within the proposed '*healthcare*' definition.
 - c. Ōtākou Health Limited agrees with the 25% minimum gross floor area threshold proposed for complementary retail activities. From experience with similar rules (such as retail ancillary to industry being capped at 10%), anything less than 25% is considered too low. This has historically resulted in the generation of unnecessary resource consent applications which eventually end up being approved anyway. A 25% threshold provides a 'sweet spot' where adequate area is provided for these ancillary components, whilst ensuring they do not dominate the use of the hub and impacting upon the vibrancy of centre zones. Any future '*retail*' activity would still be less than a quarter of the primary healthcare activity, would be complementary, and would still be inherently '*healthcare*' related by nature (i.e. a dispensing pharmacy).
 - d. Ōtākou Health Limited agrees that the 10 inpatient beds limit is sufficient for the purposes of the '*healthcare*' definition (where those greater than 10 inpatients would be considered a '*hospital*'). This is a sensible threshold which distinguishes smaller scale live-in facilities from larger scale healthcare (i.e. hospitals).
 - e. Ōtākou Health Limited agrees with the removal of '*registered health practitioners*'. With the addition of the proposed '*healthcare*' definition, there is no longer any need for this definition.
 - f. Ōtākou Health Limited agrees with the proposed changes to enable medical imaging services and blood or other medical testing or collection services to be enabled under the '*healthcare*' definition.
 - g. Ōtākou Health Limited agrees with all other changes identified under Change D16 as notified.

3.0 CONCLUSION

- 3.1 Ōtākou Health Limited support the proposed changes to provide for healthcare activities under Change D16.
- 3.2 Ōtākou Health Limited wish to be heard in support of this submission.
- 3.2 If others make a similar submission Ōtākou Health Limited would consider presenting a joint case with them at any hearing.
- 3.3 Ōtākou Health Limited cannot gain an advantage in trade competition through this submission.

Signature:



Chris Pearse-Smith
SLR Consulting NZ Ltd
On behalf of Ōtākou Health Limited

Date: 17 December 2024

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