

South Link Health

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: Oppose Change SHB3 subject to relief

NAME OF SUBMITTER: South Link Health Services Limited

SPEAK: Wishes to speak in support

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

Attention: Chris Pearse-Smith
Email: chris.pearse-smith@slrconsulting.com

PHONE: 027 712 3934

1.0 INTRODUCTION

- 1.1 South Link Health Services Limited (“South Link Health”) operates three medical centres in Dunedin as well as an operational headquarters at 5 Melville Street, Dunedin. From this site, South Link Health manages 26 medical practices across New Zealand that service approximately 15,000 patients. The organisation therefore has a significant national presence outside of the district with future plans for ongoing expansion. The Dunedin Headquarters play an essential role in managing the operation of the organisation across the country.
- 1.2 The reason for South Link Health’s submission relates to the proposed scheduling of the former Mosgiel Knitwear House at 5 Melville Street, Dunedin which houses the organisations administrative headquarters.

2.0 SUBMISSION ON PLAN CHANGE 1

Change SHB3 (Add Specified New Scheduled Heritage Buildings)

- 2.1 It its current form, South Link Health opposes the proposed scheduling of the Mosgiel Knitwear House (former) building at 5 Melville Street, Dunedin under Change SHB3.
- 2.2 Table 2 identified within the Council’s Section 32 Report lists the site number as BX091 and that the protection proposed to be required would be to the “*entire external building envelope excluding additions to the side elevation on Melville Street and excluding the wall along the southern boundary*”.
- 2.3 Paragraph 334 of Council’s Section 32 Report notes that, *the buildings that are proposed for scheduling include those identified through the following processes:*
- *Buildings that have been listed as historic places by Heritage New Zealand Pouhere Taonga (HNZPT) in accordance the criteria in Section 66(3) of the Heritage New Zealand Pouhere Taonga Act 2014 (seven additional buildings);*
 - *Suggestions received from heritage advocates and members of the public since submissions closed on the full 2GP plan review; and*
 - *Buildings identified by DCC’s heritage advisors as being of high priority for scheduling.*
- 2.4 In this case, the building is not listed as a historic place by Heritage New Zealand Pouhere Taonga (HNZPT) and therefore the listing of the proposed listing of the building was likely to have been suggested by heritage advocates/members of the public, or DCC’s heritage advisors. The heritage assessment completed by Council concludes that the building meets the ‘historic and social significance’ and ‘design significance’ tests under Policy 2.4.2.1 of the 2GP.
- 2.5 The Council has failed to adequately consider the efficiency and effectiveness (in a Section 32 assessment context) associated with the scheduling of this building on the basis that it has simply scheduled the building without looking at the implications of the current zoning which is already restrictive from a land use activity perspective. South Link Health is concerned that further planning restrictions through scheduling the building will further limit how the site and building can be effectively used in the future.

Relief Sought

- 2.6 South Link Health opposes the scheduling of the former Mosgiel Knitwear House on the basis that the scheduling will inhibit and constrain the potential for South Link Health to expand its future operations should it continue to expand at its present rate. The scheduling will also

add additional consenting costs to South Link Health associated with the ongoing upkeep of this building.

- 2.7 The site and building are located within the Princes, Parry, and Harrow Street (PPH) Zone, which provides for limited flexibility for office type uses and therefore ability for South Link Health to promote greater flexibility and use of its premises. This presents significant barriers to future development feasibility on this site. It also has significant implications for the value of the property and South Link Health's financial wellbeing, which in turn, impacts upon their ability to deliver quality health care across Dunedin.
- 2.8 It is therefore requested that either the building be removed from the proposed list of new scheduled heritage buildings, or alternatively, that the building is only scheduled where the Council adopt a broader range of uses within the Princes, Parry, and Harrow Street (PPH) Zone. The purpose of changing these zone rules, is to ensure that the 2GP will better promote the ability for the building to be used for a broader range of land use activities commensurate with other zones that specifically enable a broader range of activities. As an example:
- The activity status for both '*general retail*' and '*office*' activities in a scheduled heritage building within the Warehouse Precinct Zone is permitted. (Rule 18.3.4.11 & 15)
 - The activity status for '*office*' activities in a scheduled heritage building within the Smith Street and York Place (SSYP) Zone and Harbourside Edge (HE) Zone is permitted. (Rule 18.3.4.15)
 - The activity status for '*office*' activities in the PPH Zone (where '*BX091*' is located) is non-complying regardless of whether the building is a scheduled heritage building or not. (Rule 18.3.4.15)
- 2.9 In its current form, the proposed scheduling of the building may detrimentally impact upon South Link Health as an organisation. This is because scheduling the building provides further planning constraints on an already inhibitive zone which (from a Section 32 planning assessment perspective) further inhibits the future use of the site and this building. To be able to accept the scheduling of the building, at the very least, South Link Health would expect that the activity status for '*office*' activities within scheduled heritage buildings are updated so that they are also permitted activities within the PPH Zone, to ensure that the longevity of the buildings use, and the commercial value of the land and building are maintained.
- 2.10 Changing the activity status to a permitted activity is considered to be an appropriate change that would not significantly conflict with the centre's hierarchy (as identified in Objective 2.3.2) and associated vibrancy of the CBD and other Centre Zones.
- 2.11 It would be sensible to enable office within 'scheduled heritage buildings' within the PPH Zone, given that the outer areas of the zone (those further away from the CBD) contain very few scheduled heritage buildings (i.e. near Melville Street, and at the Harrow Street locations), limiting the potential for conflict with the centre's hierarchy. The largest concentration of existing scheduled heritage buildings (as well as those proposed under Plan Change 1) within the PPH Zone are situated along Carroll Street which immediately adjoins the Central Business District Zone.
- 2.12 It is also noted that South Link Health were able to utilise the existing resource consent (LUC-2009-286) which previously provided for an 'industrial' and 'service' activity under the previous Dunedin District Plan (2006). This resource consent was granted to support the ongoing operations of Natural History New Zealand being the former owner and occupier of the building. This allowed South Link Health to exercise this consent within this building due to production of journals, publications, and other medical materials in support of its medical practices (i.e. on-site printing and production). However, South Link Health is evolving as an

organisation and as it moves away from physical production to digital production and online services, the activity falls more towards an 'office' based activity which is not currently provided for under the 2GP framework.

- 2.13 The building at 5 Melville Street is already effectively moving away from an 'industrial' based activity, closer towards an 'office' activity. Therefore, this change to the rule framework under Plan Change 1 would not generate any notable land use pattern changes in the southern portion of the PPH Zone given there are no existing or proposed scheduled heritage buildings in this part of the Zone.
- 2.14 In summary, South Link Health opposes the scheduling of the former Mosgiel Knit House ('BX091'), subject to relief from Council which changes the activity status for 'office in a scheduled heritage building' in the Princes, Parry, and Harrow from non-complying to permitted, under Rule 18.3.4.15.

3.0 CONCLUSION

- 3.2 South Link Health opposes the proposed changes under Change SHB3 to schedule the Mosgiel Knitwear House (former) building at 5 Melville Street, Dunedin ('BX091') subject to relief which would enable office activities as permitted activities to establish within scheduled heritage buildings within the Princes, Parry, and Harrow Street Zone through amendments to Rule 18.3.4.15.
- 3.3 South Link Health wish to be heard in support of this submission.
- 3.4 If others make a similar submission South Link Health would consider presenting a joint case with them at any hearing.
- 3.5 South Link Health cannot gain an advantage in trade competition through this submission.

Signature:



Chris Pearse-Smith
SLR Consulting NZ Ltd
On behalf of South Link Health Services Limited

Date: 18 December 2024

Address for Service: South Link Health

C/- SLR Consulting New Zealand Limited
426 Moray Place, Level 1
Dunedin 9016
Attention: Chris Pearse-Smith

Phone: 027 712 3934

E-mail: chris.pearse-smith@slrconsulting.com
