

10 October 2022

Proposed District Plan Submission
Far North District Council
Private Bag 752
Kaikohe 0440
By email: pdp@fndc.govt.nz

Form 5 – Submission on a change proposed to the Far North District Plan.

On behalf of: Te Whatu Ora – Health New Zealand, Te Tai Tokerau
Private Bag 9742
Whangarei 0148

Address for Service: Te Whatu Ora – Health New Zealand, Te Tai Tokerau
Tohora House, Hospital Road
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Declaration:

1. I could not gain an advantage in trade competition through this submission
2. I am not 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

I wish to be heard in support of my submission

If others make a similar submission, I will consider presenting a joint case with them at a hearing.

Ngā mihi/Yours sincerely,



Jacqueline Bell

Director Infrastructure and Commercial Services
Te Tai Tokerau / Northern Region

Te Whatu Ora seeks that the Hospital Zone:

- i. Enables development and redevelopment of physical infrastructure on-site;
- ii. Enables the Hospital activities to continue to operate on-site and to expand and evolve to meet the growing and changing health and social demands of the community;
- iii. Enables development and redevelopment of associated activities such as car parking, residential activities, retail activities, education and research facilities, private health care facilities, staff facilities and aged care facilities etc; and
- iv. Recognises and provide for critical activities such as ambulances and helicopters.

From a planning perspective, it is desirable the planning provisions establish an overall, broad development envelope, without the requirement to obtain resource consents for new development within that envelope. The flexibility proposed seeks to provide a means by which changing Government health and funding priorities can be given effect to with ease and efficiency.

The following submissions are proposed to enable Te Whatu Ora – Health New Zealand, Te Tai Tokerau to establish an appropriate planning framework to meet the health care challenges it is facing.

The specific provisions of the Proposed District Plan that my submission relates to are:

Special Purpose Hospital Zone

I support/oppose/seek amendment to the special purpose hospital zone.

My submission is:

Retain the Special Purpose Hospital zone as notified with minor amendments listed below.

My reasons are:

It is important the Hospitals are recognised as Regionally Significant Infrastructure in the District Plan and thus supported by a special purpose zone.

State the decision you wish Council to make to ensure the issues you raise can be dealt with:

S42.001 Retain the Special Purpose Hospital zone as notified with minor amendments.

The specific provisions of the Proposed District Plan that my submission relates to are:

Overview to the Hospital Zone

I support/oppose/seek amendment to the specific provision listed above.

My submission is:

The Overview to the Hospital Zone Chapter needs to clearly detail to a Plan user that the development and redevelopment on the Hospital site will occur in the future including ancillary activities.

My reasons are:

The Hospital is a significant employment and community hub. In order for it to fulfil these roles there is a growing need currently and in the future for ancillary activities to be established on the Hospital site that are currently not provided and may at this point in time not be considered to be 'normal' Hospital activities. However, as demand for services generates a need there must be flexibility in the approach taken, whereby so long as an activity can demonstrate as being ancillary to the Hospital and health care activities undertaken or proposed to be undertaken then it should

be enabled. Examples are childcare activities, commercial activities and private healthcare and research activities which all support the current 'public' health activities occurring on the Hospital site. Furthermore the land holdings that Te Whatu Ora and Hokianga Trust have at the Hospital sites provide the opportunity to locate more of the administration and support services on the sites, freeing up other sites and capital and reducing operational expenditure on leases etc. Better use of existing resources enables more of the health funds to be spent on essential health services for the community.

State the decision you wish Council to make to ensure the issues you raise can be dealt with:

That the **Overview** of the Hospital Zone Chapter be amended as per below (in track changes), and/or make such other amendments so as to achieve the intent of the submission:

Objectives

HOSZ-O4

S42.002 Integration of associated commercial, administration and ancillary Hospital activities with health care services, which enable patients, staff, consultants, contractors and visitors to efficiently use the Hospital site and avoid travelling to multiple sites for similar and/or associated services.

HOSZ-P1

S42.003 Recognise the regional significance of the Far North District hospitals by enabling a range of existing and future hospital activities, and hospital related activities, and ancillary activities within the Hospital Zone.

HOSZ-R2

S42.004 Hospital, ~~and~~ hospital related, and ancillary activity

The specific provisions of the Proposed District Plan that my submission relates to are:

Definitions Hospital and Hospital Related Activities

I ~~support/oppose~~/seek amendment to the specific provision listed above.

My submission is:

Enabling Hospital activities as Permitted Activities is supported. However, the definition of Hospital and Hospital Related activities needs to be included in the plan. As does the definition of bed as it relates to carparking.

My reasons are:

Clearly defining those activities that are permitted on the Hospital site within the definition of Hospital is considered to be clearer and more efficient than having a number of other permitted activities which must then be assessed as to whether or not they are "directly ancillary to the hospital".

The definition of bed in the proposed district plan currently refers to watercourses.

State the decision you wish Council to make to ensure the issues you raise can be dealt with:

That the **definition of Hospital and Hospital Related Activities** be included as per the below:

Hospital

S42.005 means any regionally significant infrastructure that provides for the medical, surgical or psychiatric care, treatment and rehabilitation of persons.

- S42.006** Hospital Related Activities means activities associated with the provision of medical, surgical or psychiatric care, treatment and rehabilitation of persons within a hospital, including:
- a. offices and administration facilities;
 - b. pharmacies, food and beverage activities, bookstores, gift stores and florists;
 - c. commercial services including banks and dry cleaners;
 - d. ambulance facilities and first aid training facilities;
 - e. conference facilities;
 - f. helicopter facilities;
 - g. hospices;
 - h. hospital maintenance, operational and service facilities, including kitchens, storage facilities, waste processing and laundries;
 - i. medical research and testing;
 - j. mortuaries;
 - k. rehabilitation and recreational facilities;
 - l. training; and
 - m. private specialist and general medical facilities, services and practices.
- o) Staff, patient and visitor accommodation;
 - p) Emergency Services; and
 - q) Care Centres
 - h) Signage
 - i) Lighting

S42.007 That the **definition of bed** be included as it relates to the carparking provisions in the Proposed District Plan.

The specific provisions of the Plan Change that my submission relates to are:

HOSZ-R5 Supported Residential Care Activity

I ~~support~~/oppose/seek amendment to the specific provision listed above to align with the definition above.

My submission is:

Delete the supported residential care activity restricted discretionary activity status.

My reasons are:

Supported residential care activity is increasingly a common activity on hospital sites for the likes of activities such as Hospice, Ronald McDonald or Cancer Society houses.

State the decision you wish Council to make to ensure the issues you raise can be dealt with:

S42.008 That the whole of HOSZ-R5 is deleted.

The specific provisions of the Plan Change that my submission relates to are:

HOSZ-S1 Maximum Height

I ~~support/oppose~~/seek amendment to the specific provision listed above.

My submission is:

The permitted activity height limit be increased to 16m.

My reasons are:

A height of 16m would allow for a 3 story building including roof plant. For a modern hospital, floor to floor height is required to be in the order of 4.5 m. This allows for sufficient natural air circulation, internal plumbing, electrical and data cabling and access to services, flexibility in the use of each space and the ability to easily utilise modern medical and lifting equipment etc. Therefore, if the existing Hospital were rebuilt, it would be approximately 16m m high, plus roof top plant and lift machinery etc.

State the decision you wish Council to make to ensure the issues you raise can be dealt with:

S42.009 That rule **HOSZ-S1** be amended as per below (in track changes) and/or make such other amendments so as to achieve the intent of the submission:

The maximum height of a building or structure, or extension or alteration to an existing building or structure is ~~12~~16m above ground level

The specific provisions of the Plan Change that my submission relates to are:

HOSZ-S2 Height in Relation to Boundary

I ~~support/oppose~~/seek amendment to the specific provision listed above.

My submission is:

The permitted height in relation to boundary rule should be changed to 3m+45deg.

My reasons are:

It is recognised in the Objectives and Policies that the Hospital is Regionally Significant Infrastructure and as such it is important the Hospital can be developed in an efficient manner. In part this has been addressed in the submission on HOSZ-S1 seeking additional height as a permitted activity over part of the site.

Therefore, amendments to the proposed height in relation to boundary rules will enable efficient development of the hospital sites and the associated buildings whilst ensuring potential effects on neighbouring properties are adequately managed.

State the decision you wish Council to make to ensure the issues you raise can be dealt with:

S42.010 That rule **HOSZ-S2** be amended as per below (in track changes) and/or make such other amendments so as to achieve the intent of the submission:

- ~~1. 55 degrees at 2m above ground level at the northern boundary of the site;~~
- ~~2. 45 degrees at 2m above ground level at the eastern and western boundaries of the site;~~
- ~~3. 35 degrees at 2m above ground level at the southern boundary of the site.~~

1. 45 degrees at 3m above ground level at the boundaries of the site

Except where the site boundary adjoins a lawfully established accessway or access lot serving a rear site, the measurement shall be taken from the furthest boundary of the accessway or access lot.

This standard does not apply to:

- i. Solar and water heating components not exceeding 0.5m in height above the building envelope on any elevation.
- ii. Chimney structures not exceeding 1.2m in width and 1m in height above the building envelope on any elevation.
- iii. Satellite dishes and aerials not exceeding 1m in height above the building envelope and/or diameter on any elevation.
- iv. Architectural features (e.g. finials, spires) not exceeding 1m in height above the building envelope on any elevation.
- v. ~~A building or structure exceeding this standard for a maximum distance of 10m along any one boundary other than a road boundary, provided that the maximum height of any building or structure where it exceeds the standard is 2.7m.~~

The specific provisions of the Plan Change that my submission relates to are:

HOSZ-S3 Building Setbacks

I ~~support/oppose~~/seek amendment to the specific provision listed above.

My submission is:

Delete the requirement that a building to be set back 10 m from all site boundaries.

My reasons are:

The existing provisions in the District Plan are generally between 2-3m. Increasing the setback to 10m will adversely impact the ability to redevelop the hospital sites.

State the decision you wish Council to make to ensure the issues you raise can be dealt with:

That rule **HOSZ-S2** be amended as per below (in track changes) and/or make such other amendments so as to achieve the intent of the submission.

The building or structure, or extension or alteration to an existing building or structure must be set back at least must be setback at least ~~10m~~ 3m from all site boundaries.

The specific provisions of the Plan Change that my submission relates to are:

Required Car Parks for a Hospital and Healthcare

I ~~support/oppose~~/seek amendment to the specific provision listed above.

My submission is:

Amend the Hospital required car parking space rate of "1 per 3 beds, plus 5 per operating theatre, plus 1 per remaining 25m2 GFA" as notified.

Amend the Healthcare required car parking space rate of "1 per 20 m2 GFA" as notified.

My reasons are:

The proposed car parking standard is too generous as the size of facilities increase to meet Australasian Health Facility Guidelines which are much larger than existing facilities.

State the decision you wish Council to make to ensure the issues you raise can be dealt with:

S42.012 Simplify the **Hospital required car parking space rate** to 1 space per 2 beds plus 1 per 2 employees.

S42.013 Simplify the **Healthcare required car parking space rate** to 1 space per 2 clinics plus 1 space per 2 employees.

S42.014 Simplify **policy TRAN-P7** so that development within the Hospital Zone is not required to undertake Integrated Transport Assessments.

The specific provisions of the Plan Change that my submission relates to are:

General District Wide Matters Noise

I ~~support/oppose~~/seek amendment to the proposed noise provisions.

My submission is:

Amend the permitted activity noise limits and District Plan provisions that apply to noise emitted from the Hospital Zone (Hospital Zone).

My reasons are:

The Hospital is an existing use, located on the current sites for a number of years. Therefore, the Hospital is not new to the surrounding environment and its status as Regionally Significant Infrastructure, along with its long tenure in this environment, must be recognised. As such it must be ensured that any new development and/or redevelopment of the Hospital is not treated as though it is entirely new, rather recognising the Hospital and the adjacent landuses including residential land uses in the immediate environment have successfully coexisted for a significant period of time and the Hospital must be enabled to operate, expand and redevelop over time.

State the decision you wish Council to make to ensure the issues you raise can be dealt with:

S42.015 Amend the noise provisions in the chapter to ensure that the zone provisions don't constrain
S42.016 hospital activities nor the design and future expansion of the facilities; protect the rights of helicopters to operate on the hospital sites.

The specific provisions of the Plan Change that my submission relates to are:

Mapping

I ~~support/oppose~~/seek amendment to the specific provision listed above.

My submission is:

Ensure the Hospital Zone is applied to the hospital landholdings.

My reasons are:

To be effective the Hospital zone must be applied to the correct landholdings.

State the decision you wish Council to make to ensure the issues you raise can be dealt with:

S42.017 Make **changes to the planning maps** as necessary and/or make such other amendments so as to achieve the intent of the submission so that the following landholdings are shown as Hospital Zone:

CT NA807/182, Section 25 SBRS S OF Kawkawa

Part Section 13 Block XVI Kawakawa SD

Lot 1 DP 79488

Lot 1 DP 65762 BLK XIV MANGAMUKA SD

PT LOT 1 DP 36075 SECS 75-78 PTS 79 82 83 RAWENE SUBS BLK XIV
MANGAMUKA SD

~~Part Section 20 SBRS OF Kawakawa~~

~~Lot 1 DP 63855~~

~~Lot 2 DP 63855~~

~~Part Section 20 SBRS OF Kawakawa~~

The specific provisions of the Plan Change that my submission relates to are:

Consequential Amendments

I support/~~oppose~~/~~seek amendment to~~ the specific provision listed above.

My submission is:

Enable consequential amendments to the plan changes and/or District Plan as necessary to ensure the outcomes proposed by these submissions can be properly integrated into the District Plan.

My reasons are:

Complete and appropriate integration of the changes proposed by these submissions is necessary to ensure the development/redevelopment of the Hospital within the hospital zone can occur in an efficient and effective manner. This recognises the Hospital is a key community resource which must be enabled to develop in the future to provide for the health and well-being of the Northland community. This also recognises the District Plan is a large and layered document and as such there needs to be certainty that all of the rules can work together to achieve the desired outcome. Therefore, this submission recognises there may be consequential changes that are required to other rules/parts of the Plan to ensure the outcomes sought by these submissions are achieved.

State the decision you wish Council to make to ensure the issues you raise can be dealt with:

Enable consequential amendments to the plan changes and/or District Plan as necessary to ensure the outcomes proposed by these submissions can be properly integrated into the whole District Plan.