

FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO, A SUBMISSION ON NPDC'S NOTIFIED PROPOSED DISTRICT PLAN

Clause 8 of Schedule 1 Resource Management Act 1991

To: New Plymouth District Council
Address: Private Bag 2025, New Plymouth 4342
Email: districtplan@npdc.govt.nz

Further Submitter Details

Name of further submitter: Southern Cross Hospitals Limited
Contact person (if different from above) Jeremy Brophy - BTW Company Limited
Postal address: PO Box 551, New Plymouth
Email address for service: jeremy.brophy@btw.nz
Phone number: 027 3622562

The Council will serve all formal documents by email. Where there is no email address provided, the documents will be posted to the postal address stated above.

I am: (please tick relevant box)

- a) A person representing a relevant aspect of the public interest.
(In this case, also specify the grounds for saying that you come within this category); or
- b) A person who has an interest in the proposal that is greater than the interest of the general public.
(In this case, also explain the grounds for saying that you come within this category); or
- c) The local authority for the relevant area.

Please state the grounds as to why you come within the category selected above:

- Southern Cross Hospitals made an original submission as the owner and operator of the hospital at 205 St Aubyn Street, New Plymouth. Southern Cross Hospitals is also affected by proposed changes to the District Plan. Operation of Southern Cross Hospital in New Plymouth also represents a relevant aspect of the public interest.

Council Hearing (please tick relevant box)

Do you wish to be heard in support of your further submission? Yes No

If others make a similar submission would you consider presenting a joint case with them at a hearing? Yes No

Submission

The submission points, support or opposition, reasons and decisions sought are set out in the attached document.

Note: Any attachments to your submission should only be supporting information, not the submission.



Signature of the person making further submission
or the person authorised to sign on behalf of the
person making further submission

Date 21/08/2020

Name of Further Submitter - Southern Cross Hospitals Limited

My specific further submission(s) are as follows:

(Please only insert one further submission point per line. Add further sheets as required)

I support/oppose the submission of: <i>(State the submission no., name and address of the person making the original submission)</i>	The particular part of the submission I support/oppose are: <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			The reasons for my support / opposition are: <i>(State the nature of your further submission, giving reasons)</i>	I seek that the whole (or part) of the submission be allowed / disallowed: <i>(Give precise details of the decision you want the Council to make)</i>
425 Taranaki District Health Board - Ian Grant Private Bag 2016, New Plymouth 4342 Email: ian.grant@tdhb.org.nz; teina.malone@beca.com	Sub No. / Point No. 425.1	Support / Oppose Support	Provision Definitions / MAJOR HEALTHCARE ACTIVITIES	SCHL support this submission and seek to be involved in further discussion on or amendments to the definition.	Whole of submission be allowed.
563 Kāinga Ora - Homes and Communities - Dr Claire Kirman Ellis Gould Lawyers, Level 17, Vero Centre, 48 Shortland Street, PO Box 1509, Auckland 1140, DX CP22003, Auckland, Email: ckirman@ellisgould.co.nz	Sub No. / Point No. 563.73	Support / Oppose Oppose in part	Provision Definitions / MAJOR HEALTHCARE ACTIVITIES	SCHL generally supports a broad definition of Major Healthcare Activities, which recognises the continually evolving medical practice areas and modern technology that is utilised. The suggested changes made by Kāinga Ora are considered to unnecessarily alter the intent of the definition. SCHL therefore supports the definition as originally sought in their primary submission. This submission relates to any consequential amendments to this definition that may result from further changes influenced by submissions.	Disallow.

I support/oppose the submission of: <i>(State the submission no., name and address of the person making the original submission)</i>	The particular part of the submission I support/oppose are: <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			The reasons for my support / opposition are: <i>(State the nature of your further submission, giving reasons)</i>	I seek that the whole (or part) of the submission be allowed / disallowed: <i>(Give precise details of the decision you want the Council to make)</i>
425 Taranaki District Health Board - Ian Grant Private Bag 2016, New Plymouth 4342 Email: ian.grant@tdhb.org.nz; teina.malone@beca.com	Sub No. / Point No. 425.2	Support / Oppose Support	Provision Definitions / MEDICAL AND HEALTH SERVICES	SCHL support this submission and seek to be involved in further discussion on or amendments to the definition.	Whole of submission be allowed.
563 Kāinga Ora - Homes and Communities - Dr Claire Kirman Ellis Gould Lawyers, Level 17, Vero Centre, 48 Shortland Street, PO Box 1509, Auckland 1140, DX CP22003, Auckland, Email: ckirman@ellisgould.co.nz	Sub No. / Point No. 563.616	Support / Oppose Support	Provision HOSZ	SCHL support the submitters position on consequential changes to the Hospital Zone Chapter.	Allow submission points that relate to: <ul style="list-style-type: none"> • deletion of cross referencing of other parts of the Plan, in favour of being included in the 'how the plan works' section under Part1 • consistency of wording with the National Planning standards, particularly in referring to 'residential activities' rather than 'living activities' • recognition through policy wording that the zones 'enable' certain types of development rather than 'allow' • consistency of wording throughout chapters concerning the 'planned role, function and urban form of the zone' rather than simply 'maintaining' the existing character • deletion of activities in policies which are considered to pre-empt an assessment of appropriateness. Activities

I support/oppose the submission of: <i>(State the submission no., name and address of the person making the original submission)</i>	The particular part of the submission I support/oppose are: <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			The reasons for my support / opposition are: <i>(State the nature of your further submission, giving reasons)</i>	I seek that the whole (or part) of the submission be allowed / disallowed: <i>(Give precise details of the decision you want the Council to make)</i>
571 Southern Cross Hospitals Limited – Jeremy Brophy (BTW Company Limited) PO Box 551, New Plymouth Email: jeremy.brophy@btw.nz	Sub No. / Point No. 571.47	Support / Oppose Support in part	Provision HOSZ / Policies / HOSZ-P2	SCHL propose to amend their original submission so that Māori purpose activities are recognised as a compatible use with the Hospital Zone. This is linked to and scope provided from another SCHL submission later in this table (see 459.353).	should only be listed where they are specifically to be avoided or discouraged. Allow in part but amend as follows: HOSZ-P2 Allow activities which are compatible with the role, function and predominant character of the Hospital Zone and each precinct, including: 1. major healthcare activities; 2. medical and health services; 3. helicopter facilities, including helicopter take-off and associated fuelling and service facilities (except at Southern Cross Hospital New Plymouth); and 4. building activities. 5. Māori purpose activities
425 Taranaki District Health Board - Ian Grant Private Bag 2016, New Plymouth 4342 Email: ian.grant@tdhb.org.nz; teina.malone@beca.com	425.11	Support	HOSZ / Policies / HOSZ-P3	SCHL support this submission and seek to be involved in further discussion on or amendments to the policy.	Allow in part but remove Māori purpose activities as these will instead be recognised under HOSZ-P2.

I support/oppose the submission of: <i>(State the submission no., name and address of the person making the original submission)</i>	The particular part of the submission I support/oppose are: <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			The reasons for my support / opposition are: <i>(State the nature of your further submission, giving reasons)</i>	I seek that the whole (or part) of the submission be allowed / disallowed: <i>(Give precise details of the decision you want the Council to make)</i>
425 Taranaki District Health Board - Ian Grant Private Bag 2016, New Plymouth 4342 Email: ian.grant@tdhb.org.nz; teina.malone@beca.com	425.14	Support	HOSZ / Policies / HOSZ-P4	SCHL support this submission and seek to be involved in further discussion on or amendments to the policy.	Whole of submission be allowed.
584 Bluehaven Commercial Limited – Jeremy Brophy (BTW Company Limited) PO Box 551, New Plymouth jeremy.brophy@btw.nz	584.41	Support	TRAN / Policies / TRAN-P19	SCHL support that construction activities need to be acknowledged as temporary and a threshold for requiring a Construction Management Plan is required with regard to the scale of proposed construction activities.	Whole of submission be allowed.
425 Taranaki District Health Board - Ian Grant Private Bag 2016, New Plymouth 4342 Email: ian.grant@tdhb.org.nz;	425.21	Oppose	TRAN / Rules / TRAN-S8	With regard to the recent NPS Urban Development 2020, of note is the requirement for Councils to not require minimum onsite parking. New Plymouth District Council is a tier 2 territorial authority, whereby they are required to implement this within 18 months of commencement of the NPS. Territorial authorities must remove the provisions from their district plans without using a public plan change process – it would seem	Disallow the original subdivision, as a result of the introduction of the NPS for Urban Development 2020. Requirements for onsite parking onsite are to be removed from the Proposed District Plan.

I support/oppose the submission of: <i>(State the submission no., name and address of the person making the original submission)</i>	The particular part of the submission I support/oppose are: <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			The reasons for my support / opposition are: <i>(State the nature of your further submission, giving reasons)</i>	I seek that the whole (or part) of the submission be allowed / disallowed: <i>(Give precise details of the decision you want the Council to make)</i>
teina.malone@beca.com				reasonable and efficient for NPDC to provide for this now.	
571 Southern Cross Hospitals Limited – Jeremy Brophy (BTW Company Limited) PO Box 551, New Plymouth Email: jeremy.brophy@btw.nz	571.24	Oppose	TRAN / Rules / TRAN-S8	With regard to the recent NPS Urban Development 2020, of note is the requirement for Councils to not require minimum onsite parking. NPDC is a tier 2 territorial authority, whereby they are required to implement this within 18 months of commencement of the NPS. Territorial authorities must remove the provisions from their district plans without using a public plan change process – it would seem reasonable and efficient for NPDC to provide for this now.	Disallow the original subdivision, as a result of the introduction of the NPS Urban Development 2020. Requirements for onsite parking onsite are to be removed from the Proposed District Plan.
510 Ara Poutama Aotearoa - Department of Corrections – Andrea Millar Private Box 1206 Wellington 6140 Email: Andrea.millar@corrections.govt.nz	510.9a	Support in part	UFD / Strategic Objectives / New strategic objective	This strategic objective generally provides for social infrastructure in a similar way to that sought in SCHL’s original submission. Ara Poutama seeks that a further strategic objective should be added to the Strategic Direction Chapter to recognise and provide for social infrastructure (justice facilities, medical facilities, schools, and civic facilities). Ara Poutama considers that social facilities contribute to the health, safety and well-being of communities and need to operate in a manner that best serves the community. Ara Poutama acknowledges that social facilities are captured under the definition	Allow.

I support/oppose the submission of: <i>(State the submission no., name and address of the person making the original submission)</i>	The particular part of the submission I support/oppose are: <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			The reasons for my support / opposition are: <i>(State the nature of your further submission, giving reasons)</i>	I seek that the whole (or part) of the submission be allowed / disallowed: <i>(Give precise details of the decision you want the Council to make)</i>
				<p>of Community Facility but considers there is limited policy recognition for these activities, other than a mention in UFD-17.</p> <p>SCHL supports these reasons and considers that appropriate recognition of social infrastructure is required in the District Plan, to give effect to the NPS Urban Development 2020.</p>	
<p>459 Te Kotahitanga o Te Atiawa Trust - Hemi Sundgren</p> <p>PO Box 1097, Taranaki Mail Centre, New Plymouth 4340</p> <p>Email: sarah@teatiawa.iwi.nz</p>	459.353	Support in part	HOSZ	<p>With regard to the Proposed District Plan categorising Māori purpose activities as an incompatible use within the Hospital Zone, SCHL has submitted earlier in this table (see HOSZ-P2) to have Māori purposes activities listed as a compatible activity. Accordingly, a new submission is made below with regard to the activity status of Māori purpose activities, requesting that it be changed from non-complying to permitted.</p>	<p>Allow in part – SCHL are open to further discussion with mana whenua on how the Hospital Zone provisions can better provide for tangata whenua values.</p>
<p>571 Southern Cross Hospitals Limited –</p> <p>Jeremy Brophy (BTW Company Limited) PO Box 551, New Plymouth</p> <p>Email:</p>	571.56	Oppose	HOSZ / Rules / PREC3-R16	<p>SCHL wish to amend their position with regard to appropriate activities in the Hospital Zone, to recognise that Māori purpose activities should have a permitted activity status and not be non-complying.</p> <p>Submission summary states: Māori purposes activities should be retained as a non-complying activity.</p>	<p>Disallow the original submission, instead it is proposed that Māori purpose activities be included with PREC3-R1 and PREC3-R2 as permitted activities.</p>

I support/oppose the submission of: <i>(State the submission no., name and address of the person making the original submission)</i>	The particular part of the submission I support/oppose are: <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			The reasons for my support / opposition are: <i>(State the nature of your further submission, giving reasons)</i>	I seek that the whole (or part) of the submission be allowed / disallowed: <i>(Give precise details of the decision you want the Council to make)</i>
jeremy.brophy@btw.nz					
571 Southern Cross Hospitals Limited – Jeremy Brophy (BTW Company Limited) PO Box 551, New Plymouth Email: jeremy.brophy@btw.nz	571.51 571.57 571.50 571.54	Oppose	HOSZ / Rules / PREC3-R12 HOSZ / Rules / PREC3-R14 HOSZ / Rules / PREC3-R11 HOSZ / Rules / PREC3-R15	These are grouped for efficiency. SCHL wish to change their original position on these rules to recognise that these activities should now have a Discretionary activity status in line with the submission on point 425.11 earlier in this table. Submission summary states: these activities should be retained as non-complying activities.	Disallow the original submissions, instead it is proposed that the activities listed be included with PREC3-R3 (general retail activities) as discretionary activities.

Note to Further Submitter

This further submission on the Proposed District Plan must be received by the New Plymouth District Council by **5pm on Tuesday 25 August 2020**.

To get your further submission to us, either:

Post to: New Plymouth District Council, Reply Paid DX, DX Box NX10026, New Plymouth.

Attention: District Planning Team

Deliver to: Civic Centre, Liardet Street, New Plymouth

Email to: or to library and service centres at Bell Block, Inglewood or Waitara
districtplan@npdc.govt.nz
Visit our website: newplymouthnz.com/eplan

A copy of your further submission MUST be served on the original submitter within 5 working days after it is served on the local authority. Contact details for all submitters can be found on our Proposed Plan page at newplymouthnz.com/eplan.

Please note all information provided in your submission, including your personal information, will be made publicly available.

Your submission (or part of it) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of it):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.