

4 July 2025

Hutt City Council  
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New Zealand

Delivered by email: [district.plan@huttcity.govt.nz](mailto:district.plan@huttcity.govt.nz)

Attention: District Plan Team

Tēnā koutou,

**Health New Zealand (Late) Submission – HCC Proposed District Plan**

Health New Zealand Te Whatu Ora (Health NZ) is grateful for the opportunity to review and lodge a submission on Hutt City Council's Proposed District Plan (PDP).

Health NZ acknowledges this submission is late. Health NZ now has an in-house Planner who can manage and respond to planning matters such as this.

Health NZ owns and operates the Hutt Hospital at 620 – 664 High Street, Boulcott. The Hutt Hospital is both a regionally and nationally significant part of the public health system and nation-wide Health Estate. The Hutt Hospital is critical to the health needs of the local and regional community. Accordingly, Health NZ respectfully seeks that this late submission is accepted under delegated authority.

Health NZ's submission on the PDP consists of the following documents (to be read together):

1. Cover letter format submission (this document) and
2. Tabulated Submission, Relief and Reasons (Attachment 1)

Hutt City Council undertook targeted engagement with stakeholder groups in developing the PDP – including representatives from the former Hutt Valley District Health Board.

The public health system has undergone significant reform – including the establishment of Health New Zealand in September 2021 and a national Infrastructure Investment Group. Health NZ's submission on the PDP therefore represents an integrated view that reflects local, regional and national perspectives.

**Background:**

1. The Pae Ora (Healthy Futures) Act 2022 provides for the funding and provision of health services in New Zealand. The Act also establishes Health NZ and its responsibilities – including provisioning for the public health system.

2. The Health Estate in New Zealand is extensive and complex. To support the delivery of nationally and regionally significant health services (utilising a range of operating models) Health New Zealand owns and operates a nationwide network of landholdings and facilities – including hospitals, other clinical and non-clinical facilities and their component parts.
3. In the Hutt Valley, the primary facility is the Hutt Hospital Campus - located on High Street, Boulcott.
4. The property that constitutes the Hutt Hospital Campus is made up of multiple parcels owned by Health New Zealand.

**Introduction:**

1. Health NZ confirms that it:
  - a. Is not a trade competitor.
  - b. Wishes to be heard in relation to its submission.
  - c. If other parties make similar submissions, Health NZ is willing to assist the Hearing Panel by appearing jointly.

**Summary of Submission:**

1. Health NZ's submission reserves scope over the entire PDP and associated planning maps as it relates to directly and indirectly to its interests at the Hutt Hospital Campus.
2. Health NZ seeks all necessary proposed / alternative / consequential relief to address matters raised in this submission.
3. Health NZ's submission proposes to work with officers to jointly address matters raised in this submission – primarily as they relate to the Special Purpose Hospital Zone (SPHZ) and definitions.
4. Health NZ's submission can be summarised as:
  - a. Relating to the entire PDP and planning maps.
  - b. Seeking all relief necessary to address matters raised in and related to this submission.
  - c. Supportive of the intent to recognise, protect and enable the ongoing delivery of public health services in the Hutt Valley – including the imposition of the Special Purpose Hospital Zone (SPHZ) over the Hutt Hospital Campus. However, Health NZ submits that amendments are necessary to deliver on the proposed intent, to adequately provide for public health services at the Hutt Hospital.

- d. Health NZ submits that amendments are necessary to the SPHZ and other plan provisions to:
  - i. Adequately and consistently recognise that the Hutt Hospital is part of the nationwide Health Estate and is both Nationally and Regionally Significant Infrastructure.
  - ii. Appropriately and effectively enable the continued operation, maintenance, development and upgrade of the Hutt Hospital and Campus (including making the plan framework appropriately permissive, resolving inconsistencies between plan provisions / definitions and addressing potential gaps).
  - iii. Ensure the practical workability of the zone, district-wide and definition provisions upon implementation as intended.
- e. Health NZ opposes all aspects of the PDP that unreasonably control and/or limit public health service operation, maintenance, delivery and development including:
  - i. Heritage Scheduling of the Clock Tower Building (H147) and all associated provisions
  - ii. Definitions that exclude or constrain the Hutt Hospital e.g. Infrastructure and Regionally Significant Infrastructure
  - iii. Definitions that *may* include the Hutt Hospital but that may – without careful plan drafting – unintentionally constrain Health Care Activities
  - iv. Provisions that seek to manage matters that Health NZ does not or cannot control e.g. high trip generating activities (demand for health services)
  - v. Provisions that weaken (or undermine) the intent and function of the SPHZ provisions
- f. Health NZ wishes to be heard in relation to this submission
- g. Health NZ's submission points, reasons and relief are set out in **Attachment 1**

**Conclusion:**

The successful function of the New Zealand public health system is nationally and regionally significant to all New Zealanders and their whānau and family. Health sector infrastructure involves the flexible arrangement of services and facilities across a network of sites. Accordingly, it is critical that health infrastructure is effectively and consistently recognised for its significance, prioritised as a critical function and enabled to operate without unreasonable impediments.

**Health New Zealand**  
Te Whatu Ora

The PDP correctly recognises the Hutt Hospital (including the entire Hutt Hospital Campus) as SPHZ. This is an improvement on the operative District Plan. However, the PDP (both the SPHZ and other plan provisions) does not go far enough and/or is inconsistent in its approach to recognising, protecting and enabling Hospital and Health Care Activities at the Hutt Hospital.

In this submission Health NZ identifies modifications to the SPHZ, general and district wide provisions of the PDP to afford the necessary protections and enabling policy framework. Collectively, the relief sought by Health NZ will directly enable the continued delivery of New Zealand public health system services to residents and visitors of the Hutt Valley and wider Region.

Health NZ looks forward to being heard in relation to this submission. Please direct all enquiries to the undersigned or Helen Hamilton at [land-planning@tewhatauora.govt.nz](mailto:land-planning@tewhatauora.govt.nz).

Ngā mihi nui,

**Paulette Sorensen**

**Group Manager - Land  
Infrastructure and Investment**

**Attachment 1:** Tabulated Health NZ Submission

Plan Reference	HCC Proposed Provisions (verbatim text is shown in unmodified black text or is described [as text inside square brackets])	Health NZ Relief (additions shown in <u>blue underline</u> , deletions are shown as <del>blue strikethrough</del> and conceptual relief described in <i>blue italics</i> . Conceptual relief is shown in black text)	Health NZ – Key Reasons
<p><b>Scope of Health NZ Submission</b></p> <p><i>Health NZ’s submission relates to the entire PDP and Planning Maps as described in the submission letter dated 4 July 2025 and this table, which is Attachment 1. These documents must be read together to understand Health NZ’s submission.</i></p> <p><i>This table sets out Health NZ’s submission points, reasons and conceptual relief sought.</i></p> <p><i>For the avoidance of doubt, Health NZ seeks all alternative, additional and/or consequential relief necessary to be able to continue to efficiently and effectively deliver critical hospital and healthcare services in the Hutt Valley.</i></p>			
<b>PART 1 – INTRODUCTION AND GENERAL PROVISIONS</b>			
<b>DEFINITIONS</b>			
Functional Need	[as specified]	<p>Health NZ is supportive of the inclusion of a definition for Functional Need in the PDP.</p> <p>However, there is some risk in the proposed drafting of the definition as it limits its application to the extent that an activity “can <u>only</u> occur in <u>that</u> environment” (emphasis added).</p> <p>Functional need in the public health sector is not static – particularly as it relates to hospitals and hospitals in regional New Zealand – it is driven by a complex and changing series of factors that include remoteness of a locality, urgency of a medical event, and the specific community needs and distance to / capacity of hospital facilities at a particular point in time. Therefore, in the public health sector what may be theoretically possible in a location at one point in time can vary – therefore this definition needs flexibility to address the public health system.</p> <p>Health NZ proposes the following (or similar) relief to address this concern:</p> <p><i>Means the need for a proposal or activity to traverse, locate or operate in a particular environment because the activity can only occur in that environment. <u>Furthermore, in the case of Hospital and Health Care Activity at Hutt Hospital functional need is constrained and there are no viable alternatives for the hospital.</u></i></p>	<p>Modifying this definition provides enhanced certainty in its applicability as it relates to the Hutt Hospital.</p>
Health Care Activities	[As specified]	<p>Unlike other SPHZ provisions the PDP does not propose delineation (nor definition) between Hospitals / Hospital Activity and the other activities that are encapsulated by “Health Care Activities”. Furthermore, this definition does not explicitly include (or exclude) “Hospital” – albeit other definitions like “Emergency Service Facilities” refer to an exclusion of “Hospitals”.</p> <p>Health NZ is concerned that this definition (combined with the lack of explicit inclusion of hospitals and reference to the Hutt Hospital in the SPHZ provisions) undermines the SPHZ provisions and the recognition and priority of the Hutt Hospital.</p> <p>Health NZ submission seeks explicit recognition, prioritisation and enablement of the Hutt Hospital in the SPHZ. Health prefers relief that involves a new “Hospital” definition, exclusion of “Hospitals” at this definition and amendment throughout the SPHZ.</p> <p>Alternatively, at the very least Health NZ seeks that an explicit inclusion of Hospitals in this definition (and likely consequential changes throughout the SPHZ to appropriately prioritise and enable the Hutt Hospital)</p> <p>In relation to the rest of this definition (not related to Hospitals) Health NZ considers that the definition should be expanded. Health NZ would be willing to jointly draft this with Council officers and other relevant submitters.</p>	<p>Without modification, the proposed SPHZ (and contemporaneous general and district-wide) provisions could result in some uncertainty during plan interpretation.</p> <p>The proposed amendment would improve plan legibility and administration.</p>

Hospital	[not proposed]	Health NZ seeks the inclusion of a definition of Hospital that includes the Hutt Hospital (it may also need to include private hospitals). This could be achieved with or without any reference to “infrastructure” (regional or otherwise).	Without modification, the proposed SPHZ (and contemporaneous general and district-wide) provisions are undermined and will not adequately recognise, protect, and enable the Hutt Hospital.
Infrastructure	[The PDP uses the definition from s.2 of the RMA]	<p>The s.2 definition of Infrastructure in the RMA – and therefore the PDP - is problematic as it does not include social infrastructure like the public health system and hospitals.</p> <p>Relying on the s.2 definition of Infrastructure in the PDP undermines the intended purpose, scope, and function of the SPHZ and related provisions such as the Infrastructure provisions elsewhere in the plan.</p> <p>Health NZ opposes the definition as drafted.</p> <p>Health NZ seeks relief that the definition is amended to allow for the inclusion of the Hutt Hospital Campus (and its component parts). This relief could be most simply achieved by adding text that allows for modification by the specified list and including a new clause m:</p> <p><i><a href="#">“m. Hutt Hospital and Hutt Hospital Campus and its component parts”</a></i></p>	<p>The PDP must use to a more expansive definition to achieve HCC’s intended purpose of the proposed SPHZ. Social Infrastructure like the Hutt Hospital are unequivocally infrastructure that “well-functioning urban environments” rely on.</p> <p>While the Wellington Regional Policy Framework does not recognise the Hutt Hospital (or other social infrastructure) other regions such as Northland do. Further, the Government is currently consulting on an NPS – Infrastructure that recognises work with multiple Government Agencies responsible for infrastructure – and utilises a definition that provides social infrastructure like the Hutt Hospital.</p> <p>Without necessary modifications, the proposed SPHZ (and contemporaneous general and district-wide) provisions are weakened (if not undermined) and will therefore not adequately recognise, protect and enable the Hutt Hospital which forms part of a “well-functioning urban environment”.</p>
Regionally Significant Infrastructure	[As specified]	<p>Health NZ acknowledges the regional policy environment that does not include social infrastructure like the Hutt Hospital. Nevertheless, the Hutt Hospital is RSI.</p> <p>Health NZ opposes the definition as drafted. The definition requires amendment to include the Hutt Hospital.</p>	For the inter-related reasons listed above
Operational Need	[as specified]	<p>Health NZ is supportive of the inclusion of a definition for Operational Need in the PDP.</p> <p>Operational need in the public health sector is not static – particularly as it relates to hospitals and hospitals in regional New Zealand – it is driven by a complex and changing series of factors that include remoteness of a locality, urgency of a medical event, and the specific community needs and distance to / capacity of hospital facilities at a particular point in time. Therefore, in the public health sector operational needs are always evolving – therefore this definition needs flexibility to address the public health system.</p> <p>Health NZ proposes the following relief is added to address this concern:</p> <p><i><a href="#">“means ... Furthermore, in the case of Hospital and Health Care Activities at the Hutt Hospital operational need is evolving, constrained and often there are no viable alternatives.”</a></i></p>	Modifying this definition provides enhanced certainty in its applicability as it relates to the Hutt Hospital and its proposed zone as SPHZ which recognises the unique nature of the operational and landholding needs of a public hospital.
<b>PART 2 – DISTRICT WIDE MATTERS</b>			
<b>STRATEGIC DIRECTION</b>			

All	[The Strategic Direction is set out in five domains]	<p>Health NZ acknowledges at the outset the limitations of the decision version of Change 1 to RPS (subject to appeal) in relation to the definition of Regionally Significant Infrastructure in that it does not (like some regions) extend to include social infrastructure like hospitals. However, Health NZ submits that an expansive change to RMA (and replacement legislation) can be reasonably expected as an inevitability in relation to the inclusion of social infrastructure like hospitals. The draft NPS Infrastructure that is currently open for consultation supports this.</p> <p>Mindful of the limitations of the regional planning policy environment, Health NZ submits that it would be prudent for the PDP to take a proactive approach in the inclusion of the Hutt Hospital at the relevant plan definitions and reflect more explicitly the role that the hospital plays in the “well-functioning urban environment” of Lower Hutt.</p> <p>The Strategic Direction of the PDP is silent on the role / contribution that the Hutt Hospital plays in the relationship between population, socio-economic and environmental challenges and opportunities and aspirations for the city. For example, there is no mention of infrastructure capacity or condition in the city – nor the vital role that Regionally Significant Infrastructure (like the Hutt Hospital) plays in the wellbeing of the community and therefore or the city’s economy.</p> <p>Health NZ seeks that Strategic Direction is amended to explicitly identify the important role of infrastructure – particularly Regionally Significant Infrastructure – like the Hutt Hospital plays in the success, prosperity, health, and wellbeing of the community in Lower Hutt (and the region). Further the amendments should provide strategic direction and context for the policy framework and methods in the PDP – particularly why it is both necessary and appropriate to establish a generally permissive policy framework as it applies to the SPHZ and the Hutt Hospital.</p>	Without this modification, the proposed SPHZ (and contemporaneous general and district-wide) provisions are weakened (if not undermined) by not providing a cohesive framework within which the Hutt Hospital (whether recognised as Infrastructure and Regionally Significant Infrastructure, or not) are appropriately recognised, protected and enabled for the inter-generational benefit of the community.
<b>ENERGY, INFRASTRUCTURE AND TRANSPORT</b>			
<b>INFRASTRUCTURE</b>			
All Infrastructure Provisions and Definitions relevant to the Hutt Hospital	[As set out]	<p>Health NZ opposes the definition of Infrastructure (and RSI) proposed in the PDP.</p> <p>Health NZ submits that the Hutt Hospital should be included in the definition of Infrastructure (and RSI) and then the related plan provisions should explicitly enable the Hospital and Health Care Activities at the Hutt Hospital with an appropriately permissive plan framework.</p> <p>Elsewhere in this submission Health NZ states the reasons why the Hutt Hospital is Infrastructure and Nationally and Regionally Significant. Health NZ seeks to work with Council to amend provisions to explicitly enable Hospital and Health Care Activities at the Hutt Hospital.</p>	Without this modification, the proposed SPHZ (and contemporaneous general and district-wide) provisions are undermined by not providing a cohesive framework within which critical infrastructure (whether considered RSI or not) like the Hutt Hospital are appropriately recognised, protected and enabled for the benefit of the community.
<b>TRANSPORT</b>			
Whole section	[as described below]	<p>There is potential inconsistency and conflict within the transport provisions as they apply to activities within the SPHZ. Health NZ opposes all aspects of the transport provisions that unreasonably control, restrict and/or impose unjustified requirements on public health service activity (particularly Hospitals).</p> <p>Health NZ seeks all necessary modifications to the transport provisions that provide appropriate exclusions for public health service / Hospital activity (however it is defined or classified) in the SPHZ.</p>	<p>Without modification, the proposed SPHZ (and contemporaneous general and district-wide) provisions are undermined by not providing a cohesive framework within which critical (and in the view of Health NZ Nationally and Regionally Significant Infrastructure) like the Hutt Hospital are appropriately recognised, protected and enabled for the benefit of the community.</p> <p>If implemented as drafted the transport provisions contain both onerous provisions for activity in the SPHZ and transport provisions that may also contain inconsistencies.</p>



Overview		<p>The overview does not adequately address the role that Hutt Hospital plays in the city and region; address the fundamental matter of public health service demand and operational requirements of the Health Estate or Hutt Hospital.</p> <p>As described elsewhere in this submission – Hutt Hospital is part of a nationwide Health Estate. The Hospital is a critical life-saving community asset, Nationally and Regionally Significant Infrastructure and exists to serve the health needs of the community in the Hutt Valley (and region).</p> <p>The community need for the provision of public health services is not static and it exists regardless of service provision / met demand. To this end, the complex series of socio-economic drivers for health services are not controlled by Health NZ – rather the provision of public health services like the Hutt Hospital are a provision of service to meet community health needs. Furthermore, if public health services are unavailable in an appropriate location – the demand for services does not change. In this context, Health NZ does not have control over the source of health service demand – instead the Hutt Hospital as part of a wider nationwide Health Estate flexibly responds to healthcare need.</p> <p>In managing the Health Estate – including the Hutt Hospital – Health NZ manages its sites operations to be able to effectively and efficiently deliver health services in relation to community need. This includes convenient and safe patient and staff access and carparking facilities (including staff safety). Health NZ cannot control the complex socio-economic drivers that lead to demand for health services however part of operational management is cost effective, safe, and efficient site access, carparking and travel demand management for staff, patients, and visitors. Health NZ is supportive of PDP measures that enable support well-functioning road network and that appropriately manage transport and carparking effects at their point of generation / source. However, Health NZ opposes the imposition of transport provisions on public Hospital and Health Care Activity within the SPHZ.</p> <p>Health NZ has recently presented evidence on these matters in relation to the Far North District Council Proposed District Plan provisions.</p> <p>Health NZ seeks that the overview is modified (along with the cascading transport provisions) to reflect:</p> <ol style="list-style-type: none"> <li>The critical importance and role of Hutt Hospital as part of the nationwide Health Estate and as RSI and in service of the community in the Hutt Valley (and region);</li> <li>Recognition that demand for public health services – including Hospital and Health Care Activities in the SPHZ is complex and not controlled by Health NZ</li> <li>That transport provisions as they relate to Hospital and Health Care Activities in the SPHZ are managed by additional (new) provisions that exclude unnecessarily onerous transport provisions – particularly the imposition of high trip generating activities provisions</li> </ol> <p>Health NZ is willing to work with Council on developing workable provisions.</p>	<p>As drafted the provisions impose control over transport matters that Health NZ does not control.</p> <p>Health NZ has recently filed and presented evidence in relation to similar matters in Hearing Topic 11 of FNDC's PDP.</p>
All - Objectives and Policies	[As specified]	<p>Health NZ seeks changes to reflect the context about the Hutt Hospital as described at the Strategic Directions chapter – following that recognition and enablement through the cascading framework to the transport policy framework. Amendments are necessary in the objectives and policies to:</p> <ol style="list-style-type: none"> <li>Recognise the benefits of all infrastructure and regionally significant infrastructure – not just the road network. For example, the Hutt Hospital is a life-saving public health service that is also a lifeline that must operate during an emergency and it is</li> </ol>	<p>As drafted the provisions impose controls over transport matters that Health NZ does not control.</p> <p>Health NZ has recently filed and presented evidence in relation to similar matters in Hearing Topic 11 of FNDC's PDP.</p>



		<p>fundamentally reliant on a well-functioning road network it is appropriate that the policy framework afford it a level of priority that reflects its management within a SPHZ</p> <ul style="list-style-type: none"> <li>b. Relate to definitions that appropriately include the Hutt Hospital</li> <li>c. Include recognition that the public health system is both a critical service and is nationally and regionally significant – it relies heavily on the road network (and helicopter flights) and reverse sensitivity provisions may extend to affording protections from an unacceptably compromised roading network</li> <li>d. Provide an appropriately permissive framework for infrastructure – particularly regionally significant infrastructure that operates in a Special Purpose Zone e.g. Hutt Hospital</li> </ul>	
Rules	[All rules]	<p>Health NZ opposes the current drafting of the transport rule provisions as set out in detail in submission points on the “overview” (above). In summary, the transport provisions as they relate to the SPHZ contain requirements that are onerous, unnecessary and/or impose control over matters that Health NZ does not control.</p> <p>Health NZ seeks all necessary amendments to the rule set to achieve Transport provisions for Hospital and Health Care Activities in the SPHZ that exclude unnecessarily onerous transport provisions – particularly the imposition of high trip generating activities provisions e.g. TR-R3.</p> <p>Health NZ is willing to work with Council on jointly drafting provisions that achieve the relief sought.</p>	<p>As drafted the provisions impose control over transport matters that Health NZ does not control.</p> <p>Health NZ has recently filed and presented evidence in relation to similar matters in Hearing Topic 11 of FNDC’s PDP.</p>
All – Standards (including Table 8)	All standards as they relate to the Hutt Hospital – particularly Table 8: High Trip Generating Activity Thresholds	<p>As drafted the proposed Trip Generation provisions at TR-R3 (and therefore Table 8) may not apply in the SPHZ.</p> <p>For reasons set out earlier in this submission, Health NZ seeks contemporaneous relief in the related rules to ensure that unreasonable traffic provisions do not apply to the Hutt Hospital. Health NZ does not control the complex reasons why community demand for the health system exist – therefore High Trip Generating Activity Thresholds should not apply to Hospital and Health Care Activities related activity at the Hutt Hospital.</p> <p>Health NZ seeks necessary changes to exclude these provisions from applying to Hospital and Health Care Activities at the Hutt Hospital Campus.</p>	<p>As drafted the provisions impose control over transport matters that Health NZ does not control. This is unreasonable and unjustified.</p> <p>Health NZ has recently filed and presented evidence in relation to similar matters in Hearing Topic 11 of FNDC’s PDP.</p>
Table 8: High Trip Generating Activity Thresholds	[As specified]	<p>Health NZ opposes the imposition of the high traffic generation provisions applying to Hospital and Health Care Activities at the Hutt Hospital for the reasons listed earlier in this submission (above).</p> <p>Health NZ seeks relief that excludes these provisions from Hospital and Health Care Activities at the Hutt Hospital. Depending on the outcome of relief in relation to the related rule, relief may be required at this provision. However, Health NZ is of the view that the appropriate relief is managed most effectively earlier in the policy framework – at the transport overview, objectives and policies and rules (enabling this provision to potentially remain unaltered).</p> <p>For the avoidance of doubt, if this provision were to remain Health NZ’s position remains that the imposition of high traffic generation activity provisions on public Hospital and Health Care Activities is unreasonable and unjustified as the public health system does not control the complex socio-economic drivers (source) of demand (need) for services.</p>	<p>As drafted the provisions impose control over transport matters that Health NZ does not control. This is unreasonable and unjustified. The provisions are not supported in evidence in the Council’s s32.</p> <p>Health NZ has recently filed and presented evidence in relation to similar matters in Hearing Topic 11 of FNDC’s PDP.</p>
<b>HISTORIC HERITAGE</b>			
All Provisions (including Part 4, Schedule 1 Heritage)	[As specified]	<p>Health NZ submits in <b>opposition</b> to the proposed scheduling of the Clock Tower Building (H147) and the consequential definitions at Part 1 and associated Historic Heritage provisions at Part 2 of the PDP.</p> <p>Health NZ opposes the proposed Historic Heritage Scheduling of the Clock Tower Building in its entirety. Relief sought is the removal of the proposed scheduling.</p>	<p>Health NZ position is to exclude the Clock Tower Building from the historic heritage schedule for the following primary reasons:</p>

Buildings and Structures)			<p>1. Our statutory function requires the delivery of public health services. While heritage values are important - the ability for Health NZ to deliver cost effective public health services is matter of critical national priority</p> <p>2. Health NZ funding allocations make no provision for the diversion of public health system funding for ‘other’ aspirations such as historic heritage protection</p> <p>3. Health NZ operations are governed by a range of other statutes and associated obligations - including the requirement to operate and maintain infrastructure in the Health Estate in accordance with the Building Code’s Importance Levels (<a href="#">refer here</a>). As is directly relevant to the consideration of the heritage scheduling of Health NZ buildings, Health NZ is required to maintain and operate buildings (generally to) Importance Level 3 and 4 of the Building Code that, amongst other things, can involve substantially invasive building maintenance, repair and strengthening to meet our statutory obligations under the Building Act. It is common for older building stock to require highly invasive physical works that are at odds with heritage protections. It is an operational service delivery necessity and safety requirement that Health NZ be able to operate, maintain and redevelop its building stock and landholdings to meet the priority needs of the public health service before all other considerations</p>
<b>OTHER PART 2 – DISTRICT WIDE MATTERS</b>			
All remaining	[as specified]	Health NZ reserves its position in relation to the remaining District Wide Matters provisions – to the extent that they do not undermine the operation of the SPHZ provisions and/or they seek to unreasonably control or constrain Hospital and Hospital Related Activity in the SPHZ.	
<b>GENERAL DISTRICT WIDE MATTERS</b>			
<b>EARTHWORKS</b>			
All provisions	[as specified]	Health NZ reserves its position in relation to the remaining lighting provisions – to the extent that they do not undermine the operation of the SPHZ provisions and/or they seek to unreasonably control or constrain Hospital and Health Care Activities at the Hutt Hospital.	Without careful further consideration of the mechanics and interrelationship between the light, SPHZ and relevant definitions, PDP provisions intended to protect and enable Regionally Significant Infrastructure like Hutt Hospital will be weakened (if not undermined).

LIGHT			
All provisions	[as specified]	Health NZ reserves its position in relation to the remaining lighting provisions – to the extent that they do not undermine the operation of the SPHZ provisions and/or they seek to unreasonably control or constrain Hospital and Health Care Activities at the Hutt Hospital.	Without careful further consideration of the mechanics and interrelationship between the light, SPHZ and relevant definitions, PDP provisions intended to protect and enable Regionally Significant Infrastructure like Hutt Hospital will be weakened (if not undermined).
NOISE			
All provisions	[as specified]	Health NZ reserves its position in relation to the remaining noise provisions – to the extent that they do not undermine the operation of the SPHZ provisions and/or they seek to unreasonably control or constrain Hospital and Health Care Activities at the Hutt Hospital.	Without careful further consideration of the mechanics and interrelationship between the noise, SPHZ and relevant definitions, PDP provisions intended to protect and enable Regionally Significant Infrastructure like Hutt Hospital will be weakened (if not undermined).
PART 3 – AREA SPECIFIC MATTERS			
SPECIAL PURPOSE – HOSPITAL ZONE			
Whole section	[as described below]	<p>Given the critical role that the Hutt Hospital plays in the regional and national public health system Health NZ submits that the purpose of the SPHZ must be to appropriately protective, flexible, and enabling of Hospital Activity (including ancillary activity) above all other uses.</p> <p>As set out below – a protecting, flexible and enabling SPHZ for the Hutt Hospital Campus is the appropriate policy approach. Health NZ supports this. However, as drafted (particularly without distinction between Hospital Activity and Healthcare Activities) there are gaps, inconsistency and potential conflict within the SPHZ provisions, and other parts of the PDP (as identified earlier in this submission) that weaken (if not undermine) the SPHZ. In some cases, plan mechanics and plan implementation could be clarified or improved.</p> <p>Subject to the relief sought (or further, alternative, and/or consequential relief, as is necessary), Health NZ <b>supports</b> the application of an SPHZ to the Hutt Hospital Campus landholdings at High Street, Boulcott. Health NZ is <b>neutral</b> in relation to the zoning of landholdings owned by other entities SPHZ.</p> <p>However, Health NZ <b>opposes</b> all aspects of the SPHZ and related definitions (and other inter-related parts of the plan) that unreasonably control, restrict and/or impose unjustified requirements on the Hutt Hospital Campus landholdings.</p> <p>Earlier in this submission Health NZ has provided information regarding:</p> <ol style="list-style-type: none"> <li>1. what constitutes the Health Estate, its component parts and the requirement for flexibility to meet evolving community needs</li> <li>2. the complex demographic, socio-economic and geographic factors that influence public healthcare service needs that Health NZ does not control</li> <li>3. the role that Hutt Hospital Campus plays as part of the network of sites that exist, change and respond to meet (supply) the evolving community public health needs (demand)</li> <li>4. how Hutt Hospital is both Nationally and Regionally Significant Infrastructure (regardless of the regional planning policy environment)</li> <li>5. how the proposed Infrastructure and Regionally Significant Infrastructure definitions are problematic (excluding Hutt Hospital)</li> <li>6. the reliance that hospitals like Hutt Hospital have on well-functioning roading networks to enable staff, patients and their whanau to access public healthcare services</li> </ol>	<p>Without this modification, the proposed SPHZ (and inter-related definitions and district-wide) provisions are weakened (if not undermined) by not providing a cohesive framework within which the Hutt Hospital (whether considered Infrastructure or RSI or not) is appropriately recognised, protected and enabled for the benefit of the community.</p> <p>If implemented as drafted the SPHZ provisions will not provide the necessary level of protection and enablement that is appropriate for the Hutt Hospital.</p>

		<p>7. the operational management of hospitals – including Hutt Hospital – necessarily include adequate site access, loading and carparking provision because staff, patients, their whanau, emergency services and suppliers rely on these to access public health services safely and efficiently</p> <p>Health NZ seeks all necessary modifications (or further, alternative and/or consequential relief) to these (and inter-related) provisions to provide an appropriately protective and enabling framework to manage the use and development of SPHZ land for the benefit of the public health system.</p>	
Introductory Text	[as set out in the PDP]	<p>Health NZ seeks to work with Council officers to jointly modify these provisions.</p> <p>Health NZ proposes modifications to achieve the following (or further, alternative and/or consequential) relief (including inter-related provisions):</p> <ol style="list-style-type: none"> <li>explicitly identify Hutt Hospital and the critical role it plays in the lives of the Hutt Valley (and regional) community – which involves specific operational and functional requirements</li> <li>expand proposed text to: <ol style="list-style-type: none"> <li>clarify the intent and scope of the SPHZ provisions – including it is purposely enabling – including adaptive use and development for Hospital and Hospital Activity / Health Care Activities</li> <li>reflect that flexibility for the hospital to evolve with community needs is ‘critical’</li> </ol> </li> </ol>	<p>Refer as above.</p> <p>Amendments are necessary to provide an appropriately protective and enabling framework to manage the use and development of SPHZ land for the benefit of the public health system.</p>
Objectives and Policies	[As specified – 4 objectives and 7 policies]	<p>Health NZ seeks to work with Council officers to jointly modify these provisions.</p> <p>Health NZ proposes modifications to achieve the following (or further, alternative and/or consequential) relief (including inter-related provisions):</p> <ol style="list-style-type: none"> <li>Explicitly identifying Hutt Hospital as critical part of the public health system and for the wellbeing of the Hutt Valley (and regional) community (whether recognised as Infrastructure / RSI, or not)</li> <li>Explicitly identifying the ongoing and prioritised role that Hutt Hospital plays in the well-functioning urban environment of Lower Hutt, and enabling it</li> <li>Consistency of defined terminology in the policy framework, SPHZ provisions and elsewhere in the PDP e.g. Infrastructure and Health Care Activities</li> <li>Delineation in the SPHZ framework to appropriately prioritise Hospital Activity from other Health Care Activities (or resolve plan mechanics to ensure that Hospitals are prioritised before all other activities)</li> <li>Matching the intent of the policy framework to the cascading provisions e.g. not just ‘contributing to’ and ‘providing for’ health outcomes but the protection and enablement. <ol style="list-style-type: none"> <li>This extends to the reverse sensitivity protections being <i>for the benefit of the Hutt Hospital and community</i>; and</li> <li>accepting that some adverse effects are a reality of regionally significant facility like the Hutt Hospital (whether considered Infrastructure / RSI or not) therefore it is appropriate to limit management of effects from activity within the SPHZ to only significant adverse effects</li> </ol> </li> <li>Cascading amendments in the Objectives and Policies to: <ol style="list-style-type: none"> <li>Identify the operational characteristics and effects (including benefits) that are a necessity for the public health system, and they will also change over time with community needs</li> <li>Prioritisation of function and operational needs</li> <li>Only significant adverse effects will be managed where practical</li> <li>Remove urban design considerations in relation to Hospital and Health Care Activities at the Hutt Hospital</li> </ol> </li> <li>Reflect changes made elsewhere in definitions – that may extend to some delineation (potentially by new definitions) between ‘Hospital’ and ‘Hospital Related Activity’ / Health Care Activities</li> </ol>	<p>Refer as above.</p> <p>Amendments are necessary to provide an appropriately protective and enabling framework to manage the use and development of SPHZ land for the benefit of Hospitals, the public health system and the community they serve.</p>

		8. Reflect the reality of age of building stock and change as well as car-parking and infrastructure at Hutt Hospital	
Rules	[As set out]	<p>Health NZ seeks to work with Council officers to jointly modify these provisions.</p> <p>Health NZ proposes modifications to achieve the following (or further, alternative and/or consequential) relief (including inter-related provisions):</p> <ol style="list-style-type: none"> <li>1. Improve the functional mechanics of the SPHZ rules and how they relate to other plan provisions - particularly where the protective and enabling intent of the SPHZ provisions is undermined or encumbered with unreasonable / unjustified requirements. For example: <ol style="list-style-type: none"> <li>a. Noise</li> <li>b. Infrastructure</li> <li>c. Transport</li> <li>d. Heritage</li> </ol> </li> <li>2. Specifically enable some buildings and structures as permitted activities (without having to satisfy the SPHZ standards). <ol style="list-style-type: none"> <li>a. Ensure that the rule framework sets appropriate and simple provision for ancillary structures that may meet the PDP definitions of buildings and structures but where control or very limited control is necessary such as fences, security structures, ancillary minor footprint building / storage structures. Such features are appropriately managed by way of clear exemption of control</li> </ol> </li> <li>3. Subject activities that are controlled by the rule framework to reasonable permitted activity standards</li> <li>4. Explicitly delineable and enable Hospital (as well as Health Care Activities) Activities in an appropriately permissive framework. <ol style="list-style-type: none"> <li>a. Including addressing necessary definitions and consistency of defined terminology in the rule framework and elsewhere in the PDP i.e. relationship between the Health Care Activities and Hospital to ensure there are no unintended consequences</li> </ol> </li> </ol>	<p>Refer as above.</p> <p>Amendments are necessary to provide an appropriately protective and enabling framework to manage the use and development of SPHZ land for the benefit of the Hutt Hospital and public health system.</p>
Standards	[As set out]	<p>Health NZ seeks to work with Council officers to jointly modify these provisions.</p> <p>Health NZ proposes modifications to achieve the following (or further, alternative and/or consequential) relief (including inter-related provisions):</p> <ol style="list-style-type: none"> <li>1. the appropriate settings in the standards as it relates to Hospital and Health Care Activities v other activities</li> </ol>	<p>Refer as above.</p> <p>Amendments are necessary to provide an appropriately protective and enabling framework to manage the use and development of SPHZ land for the benefit of the Hutt Hospital and the public health system.</p>