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I seek the following decision from the local authority: *[Give precise details as this is the only part of your submission that will be summarised in the summary of decisions requested]*

Please see details in attached document.

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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.

.....
Signature of submitter (or person authorised to sign on behalf of submitter)

[A signature is not required if you make your submission by electronic means]

Date 14 December 2022

Electronic address for service of submitter: Tina@bidwillhospital.co.nz

Telephone: (03) 6871230

Postal address (or alternative method of service under s352 of the Act): 53 Elizabeth Street, Timaru

.....
Contact person: *[name and designation, if applicable]* Gemma Conlon, Director - Planner, Perspective Consulting Ltd; Email: gemma@perspective.net.nz; Ph: 0212374038

Note to person making submission

1. If you are making a submission to the Environmental Protection Authority, you should use form 16B. If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.
2. Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):
 - 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 specialist knowledge or skill to give expert advice on the matter.

SUBMISSION ON THE TIMARU PROPOSED DISTRICT PLAN

**Bidwill Trust Hospital
53 Elizabeth Street, Timaru**



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Submission on the Timaru Proposed District Plan prepared for:

Bidwill Trust Hospital

In relation to land at:

53 Elizabeth Street, Timaru

Address for Service:

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Quality Control

Report for	Bidwill Trust Hospital
By	Perspective Consulting Ltd
Author	Gemma Conlon, Director - Planner
Final issued date	14 December 2022
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1.0 Introduction

1.1 General Overview

Bidwill Trust Hospital (BTH) is located at 53 Elizabeth Street, Timaru, occupying a large corner site with frontage to York, Elizabeth and Bidwill Streets. It was first established in 1912, rebuilt in 2001, with extensions added in 2011, 2016 and 2022. BTH is a registered Charitable Trust for the benefit of health across the South Canterbury area. The complex now consists of a hospital, associated private surgery clinic, and day-care radiology facilities. Significant investment has been made in the hospital building and medical facilities in recent years and it now provides state of the art medical facilities. These new and expanded buildings and facilities provide essential services for both inpatients and outpatients and also for community and private health care services. These facilities play a major role in the health and wellbeing of the district and wider region, as well providing employment and economic activity. BTH provide the majority (80+%) of ACC non-acute surgery for the South Canterbury area and many contracts to assist Te Whatu Ora to provide non-acute surgery.

The hospital is strategically located on the western side of State Highway 1, close to the town centre. BTH is the most significant private medical facility within the South Canterbury region. BTH is unique in that it does not provide 24-hour or emergency care facilities, and therefore there are no emergency services or helicopter services that need to access the site at any time, resulting in lighting and noise emissions similar to other residential and urban areas.

BTH want to continue to provide the expected level of service now and into the future, with a high level of certainty that the significant economic investment they have made and will continue to make, will be secured by their continued use of the site and services.

The purpose of the following submission is to ensure that these activities which have high community value continue to operate, develop and upgrade and are sustained and managed in a way that avoids or mitigates adverse effects on the environment. The relief sought is as follows:

- a. A new special purpose Hospital Zone (HOSZ) be included in the PDP, encompassing the BTH lands and facilities.

Should this relief not be favourable with the hearings panel, the secondary relief sought is:

- b. The inclusion of a new rule and policy in the Medium Density Residential Zone to include hospitals and their associated buildings, facilities and activities.

While the same aims are sought through options a. and b., it is considered that the second option does not provide sufficient certainty for BTH in its continued or future operational objectives.

2.0 Submission Point 1 – Special Purpose Hospital Zone

2.1 Submission

It is submitted that a special purpose Hospital Zone (HOSZ) be included in the PDP, which recognises the regional significance of the facilities at the BTH site, and its importance to the Timaru District and to South Canterbury. The HOSZ would be applied to the existing facilities and infrastructure associated with the hospital and could also be applied to Timaru Hospital.

The purpose of the zone would be to enable the existing facilities to develop in a manner which is compatible with the surrounding zone environment. The special purpose zone would facilitate the further development of the hospital site and associated health care complex, including the provision of associated activities and support services appropriate to the primary health care function of the site.

The existing BTH has a relatively modest site area and small-scale buildings, considerate of its location and environmental context. It is proposed that any activities permitted in the hospital zone are subject to performance standards. By rezoning the land, the continued development of the site would be secured while achieving the following:

- a. Building setbacks and landscaping along street frontages, consistent with adjoining residential zone boundaries are retained. The site has already been developed in a manner which is compatible with the character and amenities of the residential zone.
- b. Maintenance of the standards of residential amenity in the adjoining area, particularly in respect to sunlight admission, visual qualities and effects of vehicle movement. The buildings and activities associated with the BTH provide adequate separation from neighbours and reduce the impacts of greater intensity and scale of building development and protect the outlook on street frontages and property boundaries.
- c. Continued development of ancillary activities associated with the hospital facilities, in a manner which does not unduly erode residential coherence.
- d. Management of traffic impacts through onsite parking provision and direction of traffic to identified access points.
- e. Providing scope for further growth, while protecting the integrity of the surrounding residential zone.

2.2 Relief Sought

BTH seek the rezoning of the site to Hospital Zone (HOSZ). This would include a set of objectives that achieve the following:

- a. Address the zone's purpose,
- b. Provide for the evolving demands, services and technological changes associated with the hospital facilities, and
- c. Seek to manage adverse effects.

It would also include a suite of Policies that:

- a. seek to enable hospital activities,
- b. only allow compatible activities,
- c. support the future growth of the zone, and
- d. require high quality urban form and development.

A supporting Rule framework that manages land use and building and structure activities, such that:

- a. Hospital activities are permitted, all other activities are discretionary,
- b. The maintenance and repair of buildings and structures is permitted,
- c. The demolition or removal of buildings and structures is permitted,
- d. Additions and alterations to buildings and structures are permitted if compliant with the associated standards, and

- e. Construction of new buildings and structures are permitted if compliant with the associated standards.

In addition to the rules outlined above, a complementary set of standards is proposed that address:

- Maximum height of buildings and structures
- Height in relation to boundary
- Building setbacks
- Building coverage

3.0 Submission Point 2 – Medium Density Residential Zone

3.1 Submission - Rules

The site is located in the MRZ of the PDP. In the MRZ Rule MRZ-R13 provides for Community Facilities as Restricted Discretionary activities. Community Facilities are defined as,

'means land and buildings used by members of the community for recreational, sporting, cultural, safety, health, welfare, or worship purposes. It includes provision for any ancillary activity that assists with the operation of the community facility.' [emphasis added]

The inclusion of the word 'health' provides some inference that hospitals may be included as a community facility. Equally however, 'health' could be interpreted as a 'health care facility', the definition of which does not include hospitals. This creates uncertainty for BTH in terms of their future operational capability at this site. As the inclusion of hospital services is not implicit, it also creates doubt for the end users of the Plan when implementing.

3.2 Relief Sought

BTH seek the inclusion of a new rule providing for existing hospitals as a permitted activity in the MRZ. The inclusion of existing hospitals as a permitted activity is appropriate for the following reasons:

- a. BTH is long established and has good relationships with the neighbours.
- b. operates without any complaint from the adjoining residential areas.
- c. Hospitals and residential activities are recognised as being 'sensitive activities', requiring high levels of amenity in terms of nuisance effects, and seeking synergistic environmental outcomes.
- d. There are no emergency service facilities associated with BTH.
- e. Activities generally occur during normal working hours.
- f. There are no obtrusive activities, emissions or nuisance effects created by the operation of BTH.

As a permitted activity, it is suggested that compliance with the Standards of the MRZ be met. If compliance is not met, then the activity status could default to Controlled, with control restricted to:

1. *scale, form and design of buildings; and*
2. *the scale of activity; and*
3. *site layout; and*
4. *landscaping; and*

5. *traffic generation and impact on the transport network; and*
6. *the location and design of any proposed car parking and loading areas and access; and*
7. *design and layout of on-site pedestrian connections; and*
8. *noise, disturbance and loss of privacy of neighbours; and*
9. *hours of operation; and*
10. *location, size and numbers of signs*

3.3 Submission – Objectives and Policies

It is submitted that the activities are in general compliance with the objectives and policies of the MRZ. Notwithstanding, a specific policy acknowledging the significance of the facilities and to provide for its ongoing operation, and its future development and redevelopment is proposed.

3.4 Relief Sought

BTH seek the inclusion of a new policies in the MRZ, as follows:

MRZ-P8 Hospitals

Recognise the benefits of, and provide for the continued use and development of existing hospitals where the scale, form and design of the hospital maintains the character, qualities and amenity values of the surrounding residential area.

MRZ-O9 Future growth

Support the future expansion of the hospital within this zone where it will enable the continues use and development of the hospital while maintaining the character of the residential area.

4.0 Submission Point 3 – Definitions

4.1 Submission

It is submitted that a definition for ‘hospital’ be included in the definitions chapter to support the implementation of the proposed new HOSZ and / or the proposed new rule and policy in the MRZ.

4.2 Relief Sought

The following new definition is sought to be included in the definitions chapter,

Hospital means areas used predominantly for the operation and development of locally or regionally important medical, surgical or psychiatric care facilities, as well as health care services and facilities, administrative and commercial activities associated with these facilities.

5.0 Summary of Relief Sought

In summary, the rezoning of the subject site to HOSZ is sought requiring:

- a suite of objectives, policies, rules and standards that support the on-going operations and development of the hospital

- a new rules and policy in the Medium Density Residential Zone providing for hospital buildings and activities
- a new definition for 'hospital'

6.0 Conclusion

BTH seeks a special purpose Hospital Zone (HOSZ) be included in the PDP to cover the area of their site located at 53 Elizabeth Street, Timaru. The HOSZ would enable a range of healthcare related and supporting activities to continue to be provided to cater for the diverse requirements of the users, employees and visitors to the hospital and healthcare facilities.

BTH need to secure and maintain the sustainable management of their facilities, infrastructure, and investment. It is submitted that the rezoning of the land will:

- provide for the effective and efficient use of the land and provide more certainty in the continued investment of these community assets,
- protect the significant community investment made in the existing facilities,
- provide certainty regarding continued operation and development, and
- ensure protection of amenity for the adjoining residential environment.