

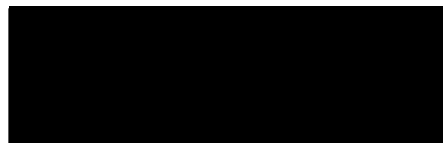


**SUBMISSION ON DRAFT NATIONAL PLANNING STANDARDS**

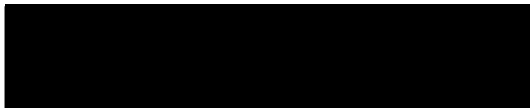
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**Our Reference:** 18Jun09

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**Introduction**

Southern District Health Board (Southern DHB) presents this submission through its public health service, Public Health South. This Service is the principal source of expert advice within Southern DHB regarding matters concerning Public Health. Southern DHB has responsibility under the New Zealand Public Health and Disability Act 2000 to improve, promote and protect the health of people and communities. Additionally there is a responsibility to promote the reduction of adverse social and environmental effects on the health of people and communities. With 4,250 staff, we are located in the lower South Island (South of the Waitaki River) and deliver health services to a population of 319,200.

Public health services are offered to populations rather than individuals and are considered a “public good”. They fall into two broad categories – health protection and health promotion. They aim to create or advocate for healthy social, physical and cultural environments.

This submission is on the proposed draft first set of National Planning Standards and has been based on the consultation document and the draft standards.

## **General Comments**

We are in agreement with the principles to create National Planning Standards with more consistent and concise plans that are easily accessible will make it easier for users. As the users include the general public, consultants and professional planners in local and regional government as well as the health sector (including DHBs) these changes are welcome.

The easier and more consistent these plans are to follow then the less opportunity there will be for misinterpretation. For those in the more remote parts of our district, having plans available in the ePlan format (for RMA Plans and policy statements) will assist in reducing any inequalities created through geographic isolation.

While we understand that this first phase of the review is only covering the plan structure, format, definitions and metrics (including mapping and e-delivery), it also provides an opportunity to develop a sense of national direction. Plans currently have significant duplication in parts across the country, and consistent approaches will reduce any misunderstandings that take place (e.g. standardising the approach to identifying natural features and landscapes) as well as reducing the administration resources required to produce the plans.

Consistency with reference to noise and vibration standards is also very welcome and will reduce the work of public health and the Ministry of Health's acoustics advisors in planning work.

We particularly interested in the area of developing a consistent approach towards utilities provisions in plans (we understand that this is under development) as this will fit in well with meeting the needs for future development.

In relation to zone purpose statements we support the inclusion of a Hospital zone but recommend that the purpose of this definition be altered slightly to the following:

"The purpose of the Hospital zone is to provide primarily for the ongoing operation of a locally or regionally important ~~primary~~-medical, surgical or psychiatric care facility, and associated health care services and healthcare facilities".

The term *primary* in this sentence refers to the hospital being the main medical facility. However, within the health sector, the term *primary* is used to describe health services that occur in the community outside of the hospital setting (e.g. general practice). Therefore we submit that it is appropriate to remove the word *primary* from the sentence to avoid any potential confusion. In addition, the term medical can be seen to be exclusive of surgical procedures or psychiatric care within the health sector.

In any case the definition of hospital or healthcare facilities is missing, and should in our view include a purpose and be broad enough to encompass all likely activities that may take place on a hospital site.

## **Summary**

We support the development of National Planning Standards that will create the ability to navigate through plans in a more effective way. We are supportive of the ability to incorporate consistent national direction in plans and for them to follow a similar format. The development of ePlans will increase the accessibility for most people and in particular those who are more geographically isolated.

The development of a consistent approach towards utilities in planning documents will be of assistance to us for planning purposes and to determine if future needs will be met.

Finally, we recommend changes to the zone purpose definition for the Hospital zone to broaden the purpose to include all likely services that are part of, or closely associated with hospital services and healthcare facilities.



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