Wellington City District Plan - Omnibus Plan Change

Hospital Activities and Healthcare Facilities in the Commercial and Mixed Use Zones

Scope of Proposed Change

To amend the Commercial and Mixed Use Zones policies and add new Permitted Activity rules within these zones to enable hospital activities and healthcare facilities.

Background

The Commercial and Mixed Use Zones (CMUZ) enable a wide range of activities. This is achieved by providing a comprehensive list of activities enabled within the 'Enabled activities' policy for the respective zone (CCZ-P1, MCZ-P2, LCZ-P2, NCZ-P2 and MUZ-P2), and the underlying rule frameworks. For the most part, activities enabled in the policies have a corresponding Permitted Activity rule pathway. Any activity without a specific rule falls under the umbrella of 'All other land use activities' and will require resource consent as a Discretionary Activity.

The District Planning Team has reviewed the activities enabled in the CMUZ and has identified that there is no Permitted Activity pathway for hospital activities or healthcare facilities, despite these being suitable for location within these zones.

Hospital activities and healthcare facilities include a wide range of activities associated with providing healthcare services, as defined here.

For further context and relevant statutory and 2024 District Plan information refer to the CMUZ Regulatory and Policy Direction Assessment.

Note that hospital activities and healthcare facilities activities are also Permitted Activities within the Special Purpose Hospital Zone that applies to the following established hospitals:

- Wellington Regional Hospital | Ngā Puna Wai Ora, Newtown
- Southern Cross Hospital, Newtown
- Wakefield Hospital, Newtown
- Bowen Hospital, Crofton Downs.

Issue

That hospital activities and healthcare facilities are not provided for as Permitted Activities within the CMUZ.

Assessment of Options

The following assessment sets out whether amendments to the provisions are necessary for improved Plan implementation and consistency.

Relevant Options

For the purposes of this evaluation, the following options have been considered:

- **Option 1:** Retain the status quo, with all hospital activities and healthcare facilities in the CMUZ requiring resource consent for a Discretionary Activity.
- **Option 2:** To amend the suite of 'Enabled activities' policies and add new Permitted Activities rules to permit hospital activities and healthcare facilities within the CMUZ.

Cost/Benefit Assessment

The costs and benefits of the two options are assessed in the table below.

Option 1: Retain the status quo

Costs

Environmental

- Requirement to travel further to reach hospital activities and healthcare facilities will have environmental costs associated with this travel.
- There will be increased potential for these activities to be located in the residential zones adjoining a CMUZ, when they would be more appropriate within the centre.

Economic

- Loss of development opportunities for these activities through a restrictive policy approach in the CMUZ.
- Increased resource consent costs.

Social

 Potential to restrict centres from becoming well-functioning urban environments where people and communities can provide for their social needs. Healthcare facilities are considered social infrastructure in the NPS-UD.

Cultural

• None identified.

Effectiveness and efficiency

Retaining the status quo is not considered to be an effective or efficient method of resolving the issue as it contributes to reduced development potential (for developers) and access to hospital activities and healthcare facilities (for residents).

Overall evaluation of Option 1

For these reasons, Option 1 is not recommended.

Option 2: Amend the CMUZ 'Enabled activities' (CCZ-P1, MCZ-P2, LCZ-P2, NCZ-P2 and MUZ-P2) and add new Permitted Activities rules to permit hospital activities and healthcare facilities

Costs

Environmental

There are no environmental costs.

Economic

• There are no economic costs.

Benefits

Environmental

• No environment benefits have been identified.

Economic

No economic benefits have been identified.

Social

• No social benefits have been identified.

Cultural

• No cultural benefits have been identified.

Benefits

Environmental

- Increased opportunities in the CMUZ to meet the needs of landowners/developers.
- Ability to co-locate different healthcare related services so these.

Social

• There are no social costs.

Social

There are no cultural costs.

 CMUZ are located on public transport routes and accommodate a wide range of activities that generate similar effects to hospital activities and healthcare facilities (such as transport safety and efficiency and carbon reduction effects).

Economic

 Reduced barriers to developers with respect to maximising the development of CMUZ sites.

Social

 Improved potential for people and communities to have a one-stop shop centre where they access all their needs.

Cultural

No cultural benefits have been identified.

Effectiveness and Efficiency

The recommended change aligns with the policy direction and supports the effective implementation of NPS-UD objective 1 by assisting with the development of well-functioning urban environments. The effects of locating hospital activities and healthcare facilities within CMUZ are expected to be comparable with the effects generated by other Permitted Activities and reduce resource consenting barriers to efficient land use. Hence Option 2 is considered an effective and efficient way of addressing the issue.

Overall evaluation of Option 2

The recommended changes to the CMUZ 'Enabled activities' policies and inclusion of new Permitted Activities rules are considered to achieve the intent of the NPS-UD and strategic direction of the 2024 District Plan (for example, CKEP-O2, SCA-O1 to SCA-O3, SSRC-O1, UFD-O1 and UFD-O7).

Overall, it is evident that the proposed amendments will benefit both developers and the public in general. Therefore, Option 2 is recommended.

Risk of acting/not acting

There is sufficient information to assess the risk of acting or not acting.

Not acting will create inherent barriers to the effective development of CMUZ sites, and the ability to locate (and co-locate) hospital activities and healthcare facilities within these zones. This has economic implications for landowners and creates an unnecessary barrier to the development of these activities close to where people work and live.

The change gives effect to Objective 1 of the NPS-UD as hospital activities and healthcare facilities contribute to well-functioning urban environments.

Conversely, enabling hospital activities and healthcare facilities within the CMUZ improves the opportunities available to landowners/developers, improves access to these facilities and has negligible effects. The recommended changes are considered to be minor in nature, with no associated risk.

Overall evaluation of issue

As demonstrated in the assessment above, for the most part there are limited benefits associated with retaining the status quo and various benefits associated with the recommended amendments. The proposed amendments remove an unnecessary restriction on land development and provide clarity for developers, resource consent planners and the public in general.

Consultation

No consultation has been undertaken.

Recommendation

For the reasons set out in this assessment, Option 2 is the recommended option.

Recommended Changes

1. Amend CCZ-P1, MCZ-P2, LCZ-P2, NCZ-P2 and MUZ-P2

CCZ-P1 - Enabled activities

Enable a range and diversity of activities that support the purpose of the City Centre Zone and enhances its vibrancy and amenity, including:

- 1. Commercial activities;
- 2. Residential activities, located;
 - a. Above ground level; or
 - b. At ground level along any street not subject to active frontage and/or verandah coverage requirements.
- 3. Community facilities;
- 4. Educational facilities;
- 5. Arts, culture and entertainment activities;
- 6. Emergency service facilities;
- 7. Marae activities;
- 8. Community corrections activities;
- 9. Public transport activities;
- 10. Visitor accommodation;
- 11. Repair and maintenance service activities;
- 12. Recreation activities;
- 13. Parliamentary activities;
- 14. Government activities; and
- 15. Civic activities-; and
- 16. Hospital activities and healthcare facilities.

MCZ-P2 - Enabled activities

Enable a range of activities that contribute positively to the purpose of the zone and meet sub-regional needs including:

- 1. Commercial activities;
- 2. Residential activities;
- 3. Community facilities;
- 4. Educational facilities;
- 5. Arts, culture, and entertainment activities;
- 6. Marae activities;
- 7. Emergency service facilities;
- 8. Community corrections activities;

- 9. Visitor accommodation;
- 10. Recreation activities;
- 11. Repair and maintenance service activities;
- 12. Industrial activities; and
- 13. Public transport activities-; and
- 14. Hospital activities and healthcare facilities.

LCZ-P2 - Enabled activities

Enable a range of activities that contribute positively to the role and function of the Zone and meet the needs of the residential catchment and surrounding suburbs including:

- 1. Commercial activities;
- 2. Residential activities;
- 3. Community facilities;
- 4. Educational facilities;
- 5. Arts, culture, and entertainment activities;
- 6. Emergency service facilities;
- 7. Community corrections activities;
- 8. Visitor accommodation;
- 9. Recreation activities;
- 10. Public transport activities; and
- 11. Industrial activities-; and
- 12. Hospital activities and healthcare facilities.

NCZ-P2 - Enabled activities

Enable a range of activities that contribute positively to the role and function of the Zone and meet the needs of the residential catchment and surrounding suburbs including:

- 1. Commercial activities;
- 2. Residential activities;
- 3. Community facilities;
- 4. Educational facilities;
- 5. Arts, culture, and entertainment activities;
- 6. Emergency service facilities;
- 7. Community corrections activities;
- 8. Visitor accommodation;
- 9. Recreation activities;
- 10. Public transport activities; and
- 11. Industrial activities: and
- 12. Hospital activities and healthcare facilities.

MUZ-P2 - Enabled activities

Enable a range of activities that contribute positively to the role and function of the Zone and meet the needs of the residential catchment and surrounding suburbs including:

- 1. Commercial activities;
- 2. Residential activities;
- 3. Community facilities;
- 4. Educational facilities;
- 5. Arts, culture, and entertainment activities;
- 6. Emergency service facilities;
- 7. Community corrections activities;
- 8. Visitor accommodation;
- 9. Recreation activities;
- 10. Public transport activities; and
- 11. Industrial activities-; and
- 12. Hospital activities and healthcare facilities.

1. Add new Permitted Activities Rules

CCZ-Rx, MCZ-Rx, LCZ-Rx, NCZ-Rx and MUZ-Rx – Hospital activities and healthcare facilities

1. Activity Status: Permitted

Consequential Amendments

No consequential amendments are required.