

15 December 2025

Kaipara District Council
Private Bag 1001
Dargaville 0340
New Zealand

Delivered by email: districtplanreview@kaipara.govt.nz

Attention: District Plan Team

Tēnā koutou,

Health New Zealand Further Submission – Kaipara DC Proposed District Plan

This is Health New Zealand Te Whatu Ora's (Health NZ) further submission on Kaipara District Council's Proposed District Plan (PDP).

Health NZ has an interest greater than the general public has, as:

1. It is the Crown Entity (established by the Pae Ora (Healthy Futures) Act 2022) with responsibilities that include provisioning for the public health system. To support the delivery of nationally and regionally significant health services (utilising a range of operating models) Health NZ owns and operates a nationwide network of landholdings and facilities – including hospitals and other clinical and non-clinical facilities. In the Kaipara District – this includes the Dargaville Hospital Campus located at Awakino Road¹;

and

2. Health NZ submitted on the PDP (submission #269)

The specific submission points, position, relief sought and reasons that this further submission relates to are set out in the **attached table**. Collectively this letter and the attached table form Health NZ's further submission and Form 6 requirements.

¹ The property that constitutes the Dargaville Hospital Campus is made up of two parcels – the larger of the two (Lot 2 DP 189062) is owned by Health New Zealand while the smaller parcel that contains the main hospital buildings (Lot 1 DP 189062) is owned by Health NZ and Kaipara Community Health Trust.

Health NZ confirms that it is not a trade competitor and wishes to be heard in support of this further submission. If other parties make similar submissions, Health NZ is willing to assist the Panel by making joint submissions.

Please direct all enquiries to the undersigned or Helen Hamilton at land-planning@tewhatauora.govt.nz.

Ngā mihi nui,



Paulette Sorensen

**Group Manager - Land
Infrastructure and Investment**

Attachment 1: Tabulated Health NZ Further Submission

Sub Point #	Submitter Name	Plan Reference	Support / Oppose	Reasons	Relief Sought
PART 1 – INTRODUCTION AND GENERAL PROVISIONS					
DEFINITIONS					
FS53.1 284.26	New Zealand Defence Force	Helicopter Landing (new)	Support in part	<p>The submitter proposes this new definition as an alternative - if the relief sought at NOISE-R6 is not granted.</p> <p>Health NZ supports in part the introduction of the definition – to the extent that it does not in any way undermine the public health system (namely, medical emergency transport).</p> <p>Unfortunately, medical emergency transport (including helicopter flights and associated infrastructure) is a necessary part of the public health system. Specifically, medical emergency helicopter flights must be able to operate without resource consent (like emergency road transport by ambulance).</p> <p>Medical emergency evacuations are clinical decisions. Health NZ utilises emergency transport criteria as part of broader clinical risk assessments.</p>	If the submitter’s alternative is required, allow this submission to the extent that it does not in any way undermine the operation of medical emergency helicopter flights in the public health system as a permitted activity.
FS53.2 147.4	Helicopter Association	Helicopter movement (new)	Support in part	<p>Health NZ’s primary submission identified that in relation to the non-emergency provisions at NOISE-R6(1)(c), there is a definition of helicopter movements that is both buried within provisions (following NOISE-R6(1)(c)(iii)) and unreasonably defined.</p> <ul style="list-style-type: none"> - As drafted, the definition appears as an ‘*’ to a provision where it could be missed. - The definition also appears to confuse helicopter trips and movements – defining what would ordinarily be considered a single helicopter trip as a movement. In effect this definition halves the proposed helicopter trip provisions. <p>Therefore, Health NZ supports in part the introduction of a well drafted definition. Health NZ supports the submitter’s definition to the extent that it does not in any way undermine the public health system (namely, medical emergency transport).</p> <p>Unfortunately, medical emergency transport (including helicopter flights and associated infrastructure) is a necessary part of the public health system. Specifically, medical emergency helicopter flights must be able to operate without resource consent (like emergency road transport by ambulance).</p> <p>Medical emergency evacuations are clinical decisions. Health NZ utilises emergency transport criteria as part of broader clinical risk assessments.</p>	Allow this submission to the extent that it does not in any way undermine the operation of medical emergency helicopter flights in the public health system as a permitted activity.
FS53.3 147.5	Helicopter Association	Heliport (new)	Support in part	<p>Health NZ supports in part the introduction of the definition – to the extent that it does not in any way undermine the public health system (namely, medical emergency transport).</p> <p>Unfortunately, medical emergency transport (including helicopter flights and associated infrastructure) is a necessary part of the public health system. Specifically, medical emergency helicopter flights must be able to operate without resource consent (like emergency road transport by ambulance).</p> <p>Medical emergency evacuations are clinical decisions. Health NZ utilises emergency transport criteria as part of broader clinical risk assessments.</p>	Allow this submission to the extent that it does not in any way undermine the operation of medical emergency helicopter flights in the public health system as a permitted activity.
FS53.4 292.8	Transpower	Infrastructure	Oppose	<p>Health NZ’s primary submission sets out the reasons why the use of the s.2 RMA definition is problematic in relation to the exclusion of health infrastructure, and therefore how it undermines the intent and function of the proposed Special Purpose Hospital Zone and related Infrastructure provisions – thereby putting the PDP at odds with the RPS and recently resolved PRP in relation to</p>	Disallow this submission point.

				Regionally Significant Infrastructure. The proposed definition should not be retained without amendment to resolve these deficiencies.		
FS53.5	284.5	New Zealand Defence Force	Infrastructure	Support	In addition to the reasons above, Health NZ supports amendments to the definition to include all types of infrastructure.	Allow the submission
FS53.6	292.15	Transpower	Regionally Significant Infrastructure	Oppose in part	Health NZ's primary submission sets out the reasons why the proposed definition is incomplete and does not include Dargaville Hospital <u>and</u> is inconsistent with higher order regional planning documents that recognise hospitals as RSI. Health NZ's submission also identifies potential implementation issues with the definition drafting. The proposed definition should not be retained without amendment to resolve these deficiencies.	Disallow this submission to the extent that it may inhibit the amendments sought by Health NZ to the definition of RSI
FS53.7	284.8	New Zealand Defence Force	Regionally Significant Infrastructure	Support	In addition to the reasons above, Health NZ supports amendments to the definition to include all types of RSI.	Allow the submission
FS53.8	284.7	New Zealand Defence Force	Reverse Sensitivity (new)	Support	Health NZ agrees that a new reverse sensitivity definition is required provide clarity for plan users. The submitter's proposed wording is similar to relief proposed by other submitters.	Allow, with potential modification for clarity / workability and reflecting caselaw. Where it assists the Panel, Health NZ is willing to work with other submitters of jointly draft agreeable wording.
FS53.9	292.19	Transpower	Reverse Sensitivity (new)	Support	Health NZ agrees that a new reverse sensitivity definition is required provide clarity for plan users. The submitter's proposed wording is similar to relief proposed by other submitters.	Allow, with potential modification for clarity / workability and reflecting caselaw. Where it assists the Panel, Health NZ is willing to work with other submitters of jointly draft agreeable wording.
FS53.10	147.6	Helicopter Association	Reverse Sensitivity (new)	Support	Health NZ agrees that a new reverse sensitivity definition is required provide clarity for plan users. The submitter's proposed wording is similar to relief proposed by other submitters.	Allow, with potential modification for clarity / workability and reflecting caselaw. Where it assists the Panel, Health NZ is willing to work with other submitters of jointly draft agreeable wording.
PART 2 – DISTRICT WIDE MATTERS						
STRATEGIC DIRECTIONS						
FS53.11 FS53.12	292.23 292.24	Transpower New Zealand Limited	Strategic Directions (new)	Support	Health NZ's primary submission identifies the gaps / inconsistencies between the Strategic Directions and the Infrastructure Provisions, as well as the SPHZ – that recognises Dargaville Hospital as RSI. Furthermore, Health NZ's primary submission identifies the inconsistencies and conflict between the RSI definition and the s32 evidence supporting the proposal of the SPHZ for the Dargaville Hospital. Accordingly, Health NZ supports the introduction of new Strategic Directions that are appropriately drafted to address <i>all</i> RSI in the district.	Allow these submission points with all necessary alternative or consequential amendments to enable the recognition and enablement of Dargaville Hospital as RSI

ENERGY, INFRASTRUCTURE AND TRANSPORT						
INFRASTRUCTURE						
FS53.13 to FS53.18	284.10 – 284.15	New Zealand Defence Force	Infrastructure	Support	<p>Health NZ's primary submission sets out clearly the issues related to Infrastructure Chapter, including:</p> <ul style="list-style-type: none"> - Noting the draft NPS Infrastructure (that, among other things, addressed social infrastructure like hospitals) that was the subject of public engagement - The gaps / lack of context in the Strategic Directions in relation to infrastructure - Inconsistencies across the PDP in relation to RSI, Infrastructure, functional operation of SPHZ and Infrastructure provisions etc <p>At these submission points the Submitter identifies a variety of inconsistencies and gaps in provisions and seeks relief that include addressing gaps in the infrastructure provisions. Health NZ supports the relief sought to the extent that it addresses these fundamental drafting errors / implementation issues – to the extent that they do not undermine Health NZ's interests in relation to the Dargaville Hospital and SPHZ.</p>	Allow these submission points to the extent that they do not in any way undermine the operation of Dargaville Hospital.
FS53.19 to FS53.24	292.29 292.30 292.35 - 38	Transpower New Zealand Limited	Infrastructure	Support	The relief sought by the submitter at these submission points seek to address aspects of the deficiencies identified in Health NZ's primary submission and reflect relief sought earlier in Strategic Directions.	Allow these submission points to the extent that they do not undermine the operation of the Dargaville Hospital.
GENERAL DISTRICT WIDE MATTERS						
NOISE						
FS53.25	284.26	New Zealand Defence Force	Noise	Support in part	<p>Health NZ's primary submission identified the inconsistency, potential conflict and unreasonable control within the noise provisions and relevant definitions as they apply to activities within the SPHZ. Health NZ opposes all aspects of the noise provisions and related definitions that unreasonably control, restrict and/or impose unjustified requirements on public health service activity.</p> <p>Health NZ seeks all necessary modifications to the noise provisions and related definitions that provide appropriate enablement of and protections for public Hospital and Hospital Related Activity in the SPHZ (including medical emergency helicopter flights).</p> <p>Health NZ is supportive of the submission point to the extent that it does not undermine the delivery of public health services in the SPHZ – particularly redrafting provisions that recognise that medical emergency evacuation flights should not be controlled by District Plan provisions.</p>	Allow this submission to the extent that it does not in any way undermine the operation of Dargaville Hospital (including medical emergency helicopter flights as a permitted activity).
FS53.26	284.28	New Zealand Defence Force	Noise	Support in part	For the reasons specified at submission point 284.26	Allow this submission to the extent that it does not in any way undermine the operation of Dargaville Hospital (including medical emergency helicopter flights as a permitted activity).
FS53.27	284.29	New Zealand Defence Force	Noise	Support in part	For the reasons specified at submission point 284.26	Allow this submission to the extent that it does not in any way undermine the operation of Dargaville Hospital (including medical emergency helicopter flights as a permitted activity).