

Further submission by
The National Public Health Service
Health New Zealand

on the
Proposed Invercargill District Plan Change 2
pursuant to Clause 6 of Schedule 1, Resource Management Act 1991

To: Invercargill City Council
101 Esk Street
Invercargill 9810
planning@icc.govt.nz

Further Submission From: The National Public Health Service (NPHS)
Health New Zealand

Further Submission on: Proposed Invercargill District Plan Change 2 notified on 14 January 2026

Provisions the submission relates to: The topics of submission, the NPHS support or oppose and any relief sought are contained in detail on the following pages.

Status as Further Submitter: We consider that we represent a relevant aspect of the public interest, have an interest greater than the interest that the general public has, and may therefore make further submissions in accordance with clause 8, Schedule 1, RMA.

NPHS recognises its responsibilities to improve, promote and protect the health of people and communities of Aotearoa New Zealand under the Pae Ora (Healthy Futures) Act 2022 and the Health Act 1956. Pae Ora requires the health sector to protect and promote healthy communities and health equity across different population groups by working together with multiple sectors to address the determinants of health.

NPHS is focused on the achievement of equitable health outcomes. We use the Ministry of Health's definition of equity:

In Aotearoa New Zealand people have differences in health that are not only avoidable, but unfair and unjust. Equity recognises different people with different levels of advantage require different approaches and resources to get equitable health outcomes.

Hearing:

We wish to be heard in support of my further submission; and will consider presenting a joint case at any hearing with other parties presenting on similar matters.

Signed by:

Vince Barry



Regional Director
National Public Health Service
Te Waipounamu

Professor John Eastwood



Medical Officer of Health
National Public Health Service
Te Waipounamu

Date: 13/3/2026

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Provision Reference	Submission point ID	Submitter and Submitter ID	Relief sought	Support/ Opposition	Reason	Decision sought
Whole Plan Change	01.01	Southland Community Housing Group 01.01	Accept all the proposed changes to the District Plan	Support in part	Support insofar as it incorporates the changes requested by the National Public Health Service, Te Waipounamu Submission	We seek that this submission point be allowed.
Whole Plan Change	12.01	Southland District Council 12.01	Accept all the proposed changes to the District Plan	Support in part	Support insofar as it incorporates the changes requested by the National Public Health Service, Te Waipounamu Submission	We seek that this submission point be allowed.
Whole Plan Change	11.01	Environment Southland 11.01	Accept all the proposed changes to the District Plan	Support in part	Support insofar as it incorporates the changes requested by the National Public Health Service, Te Waipounamu Submission	We seek that this submission point be allowed.

Provision Reference	Submission point ID	Submitter and Submitter ID	Relief sought	Support/ Opposition	Reason	Decision sought
General - actions, rules and policies of the PC2 to enhance efficient energy usage	11.03	Environment Southland 11.03	Encourage appropriate site and building orientation that supports energy efficiency and solar energy gain.	Support	By designating access to acceptable levels of daylight and sunlight in outdoor spaces and habitable spaces. Energy efficiency improvements can reduce household energy costs and reduce greenhouse gas emissions. Co-benefits of efficient natural energy use include improved health in insulated homes, and increased comfort.	We seek that this submission point be allowed.
Zones	11.06	Environment Southland 11.06	Changes are requested to remove areas between Tay and Tweed Street from PC2 as they are identified as potentially floodable by the Otepunī Creek.	Support in part	Intensification of residential dwellings should not occur within an identified natural hazard location as it is contrary to the Southland Regional Policy Statement.	We seek this submission point be allowed or alternatively any new development specifies a minimum ground floor level in this location.

Provision Reference	Submission point ID	Submitter and Submitter ID	Relief sought	Support/ Opposition	Reason	Decision sought
Residential 1A Zone Rules	16.24 related to RES1AZ-R5	Kāinga Ora - Homes and Communities 16.24	A number of suggested amendments to the text under RES1AZ-R5 including the suggested addition of additional rules.	Support in Part	Supports using the number of units as a method of managing the effects of medium density development. Considers that the words 'units' and 'residential units' are easier for plan-users to understand and more commonly used in district plans than 'residences'. Opposes universal design and acoustic privacy as these matters are best addressed under the Building Act.	We seek this submission point be allowed except for the deletion of "and consideration of universal design" in proposed amendment RES1AZ7 3.c.