

Before the Independent Hearings Panel
Western Bay of Plenty District Council

under: the Resource Management Act 1991

in the matter of: Submissions and further submissions in relation to
Plan Change 92 to the Proposed Western Bay of
Plenty District Plan

and: **Ryman Healthcare Limited**
(Submitter 35)

Statement of Evidence of **Matthew Brown** on behalf of Ryman
Healthcare Limited

Dated: 25 August 2023

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STATEMENT OF EVIDENCE OF MATTHEW BROWN ON BEHALF OF RYMAN HEALTHCARE LIMITED

INTRODUCTION

- 1 My full name is Matthew Glen Brown.
- 2 I hold a New Zealand Certificate in Mechanical Engineering.
- 3 I am the General Manager – Development at Ryman Healthcare Limited (*Ryman*). I manage and oversee the development of Ryman’s retirement villages across New Zealand from land acquisition through to operation of the village. The key development phases include site acquisition, concept design and the resource consent process, followed by construction, commissioning and handover to the Operations Team.
- 4 I am also responsible for general management of the New Zealand development team and consultant inputs into our resource consent applications and plan submissions. I also lead our stakeholder and council engagement, as well as community consultation. I have held this role since March 2020. Prior to joining Ryman, I was the NZ Development Manager for an aged care provider from June 2011.
- 5 Although I do not give evidence as an expert witness, I have considerable knowledge and understanding of the retirement sector and the challenges the industry faces in resource management processes. I have appeared as a witness in district plan and resource consent processes relating to retirement villages, including before various panels on several recent proposed plan changes that respond to the government’s enabling housing legislation.
- 6 I am familiar with Plan Change 92 to the Proposed Western Bay of Plenty District Plan (*PC92*) as it relates to the submissions lodged by Ryman and the Retirement Villages Association of New Zealand Incorporated (*RVA*). I also note that I have read the Council Officers' Report where it addresses the RVA's and Ryman's submissions on PC92.

SCOPE OF EVIDENCE

- 7 My statement includes an overview of Ryman and our villages and residents. I also highlight the key challenges faced in consenting retirement villages, as well as our experiences with consenting processes, including in the neighbouring Waikato region (given we have not been through a consent process in the Bay of Plenty Region for some time). I also address aspects of the Council Officer’s Report, noting that Ms Nicki Williams will address these matters in further detail.

EXECUTIVE SUMMARY

- 8 Ryman is New Zealand's leading provider of comprehensive care retirement villages. We now have 38 operational retirement villages providing homes for more than 13,200 older residents across New Zealand. We offer a comprehensive 'continuum of care' model that allows people to stay in one place as their health care needs change.
- 9 Ryman does not currently have a retirement village in Western Bay of Plenty. We are, however, actively looking to invest in the District so that we can provide the highest quality housing and care for the Western Bay of Plenty's older residents. Ryman therefore has a significant interest in how PC92 provides for retirement villages and aged care in the District.
- 10 Ryman has identified that good quality housing and care for older people is significantly undersupplied in many parts of the country. I would go so far as to say the undersupply issue is at crisis point. The Western Bay of Plenty District is no exception.
- 11 Naturally, people want to "age in place" as their health and lifestyle requirements change over time; that is to remain close to family and friends and familiar amenities. Ryman's retirement villages must also provide for the specialist physical and wellbeing needs of older people. The average age of our retirement unit residents is 82.1 years. The average age of aged care residents is 86.7 years. These residents have complex and sometimes severe mobility and health related constraints affecting many of their daily tasks. We therefore provide many communal amenities and services on site to cater for residents. These features allow people to access the things they need to stay independent for as long as possible, as well as stay socially connected and engaged. Functional and operational requirements are also a key driver for our village locations and their designs. Our villages also tend to be medium to high density as a result of these requirements.
- 12 The size and location requirements of modern retirement villages mean that suitable sites in existing urban areas are rare. Therefore, it is important to Ryman that retirement accommodation on all appropriate sites (including in commercial zones) is encouraged and enabled. I also note that large sites provide significant opportunities to internalise effects. For example, we can provide large setbacks, step building heights away from neighbouring boundaries and put service functions in areas that ensure any external effects are appropriately managed. These design options allow us to achieve medium to high density and make efficient use of large sites without materially impacting our neighbours. I discuss later in this evidence the design strategies we employed for our Cambridge retirement village to enable us to fit into the neighbourhood.

- 13 However, despite the best designs and proactive consultation with the community and council before and after lodging consent applications, our projects are often opposed by neighbours and related resident groups or misunderstood by council officers. The needs of our residents, the social and economic benefits of our villages, and the functional and operational requirements for the layouts of our villages are not given sufficient attention. Instead, the focus of consent processes has tended to be on neighbouring resident amenity interests and concerns.
- 14 We have also found that district plans around New Zealand are inconsistent and often poorly provide for retirement villages.
- 15 These factors have led to major delays in providing much needed housing and care. Projects that are notified cause substantial delays – sometimes in the order of 2-3 years (for example, our Karori village in Wellington).
- 16 Ryman is therefore very encouraged by the new direction in the government’s enabling housing legislation. We are hopeful that this process will allow the balance of considerations in consenting processes to be reset appropriately and for unnecessary complexity to be removed. These outcomes will enable us to move more quickly on our housing projects and invest with greater certainty.
- 17 The council officers agree that retirement housing is an important component of the District’s communities, and should be provided for in the District Plan.¹ I strongly agree with this statement.
- 18 Despite that, the council officers recommend rejecting the majority of the RVA and Ryman’s submission points. Reasons include that the plan already addresses retirement villages sufficiently, and that retirement villages need to be assessed on a case-by-case basis given they are large and complex. The officers also appear to misunderstand the nature of our villages and resident needs, and the unique layouts of the village and the different unit types as well as the complementary services we offer.
- 19 This is a disappointing position to take in the context of a clear policy directive from central government to enable housing intensification for all parts of the community through the present process. There is a significant need and demand for more retirement village accommodation in the Western Bay of Plenty District. Clarity and efficient consent processes in districts plans are hugely important for us when it comes to purchasing and then consenting new villages sites. At the very least, we were expecting retirement villages to have access to similar planning treatment as

¹ Page 17 – Section 42A Report, Plan Change 92 - Ōmokoroa and Te Puke Part 2 (Definitions, Activity Lists and Standards), dated 11 August 2023.

for other multi-unit ('4 or more') residential developments.

- 20 I support Ms William's view that that the key difference between the provisions in the notified PC92 and in the regime put forward by the RVA and Ryman is that the latter is more targeted and better suited to assess the effects (positive and negative) of retirement village developments. Our expert team have developed these provisions with many years of combined experience working in planning and consenting processes. I also note that Ryman is certainly not seeking to shift away from an 'effects management' approach. The retirement village provisions sought by Ryman and the RVA in their primary submissions are intended to improve and streamline consent processes to ensure efficient delivery of housing for older people, without taking out the necessary safeguards to manage potential effects.
- 21 Overall, Ryman supports the relief sought by the RVA. Ms Nicki Williams will address the key issues with PC92 in more detail in her planning evidence.

RYMAN, ITS RESIDENTS AND THE VILLAGES

- 22 Ryman is New Zealand's leading retirement village operator. Ryman was established in Christchurch in 1984 and now operates 38 retirement villages across New Zealand, including one village in the Bay of Plenty region.
- 23 Nationwide, our villages provide homes for more than 13,200 older residents and employ over 6,700 people. We currently only have one village in the Bay of Plenty region (Bob Owens in Tauranga). However we are actively looking for new sites across the region.
- 24 Ryman is considered to be a pioneer in many aspects of the healthcare industry – including retirement village design, standards of care, and staff education. Ryman considers that our residents deserve a high quality, safe and warm environment, where people can go about their day to day activities comfortably and to a standard they choose to live in.
- 25 All of Ryman's residents are less active and mobile than the 65+ population generally as well as the wider population. Ryman's independent unit residents are early 80s on move-in and our aged care residents are mid-late 80s on move-in. As noted by Mr Collyns and Professor Ngaire Kerse, this demographic has many complex health conditions that require specialist amenities and care assistance. Our residents are generally more vulnerable than the general population and have different levels of need. Needs range from those who are independent to those requiring a high level of 24 hour specialist care, such as that provided in our dementia units.

- 26 When residents move into a village, they are of an older age, may be frail, many have on-going chronic conditions, and they are beginning to experience reduced mobility and age-related memory impairment. Many will be widows or widowers. Most hospital residents are not independently mobile. Dementia residents are in a secure environment and need to be accompanied when outside. Safety, security and ease of access to village amenities are highly important. It is also important that communal areas are not too hot, too cold or too bright, as some older people find such extremes difficult.
- 27 The layout and environment of Ryman's villages are therefore designed to meet the specific physical and social needs of older people.
- 28 Ryman also has programmes in place to encourage all of our residents to be as active as their health permits, and as independent as possible for as long as possible. For example, we designed an age-specific low impact cardio programme called Triple A. We also have swimming pools, indoor and outdoor bowls, accessible walkways and high quality landscaped areas. We employ an activities manager to run comprehensive programmes and encourage our residents to engage in as much daily group and social activities as possible.
- 29 For our residents who are no longer capable of independent living and who have limited mobility, we have a philosophy of "*bringing the world to your window*". We strive to have activity happening across the village and especially within and around the buildings. While you and I may not necessarily find it interesting, watching people arriving and leaving the village is enjoyed by many of our residents.
- 30 Ryman also ensures that its villages are blended into established, good-quality residential communities. This is vitally important so that the residents continue to function as an integral part of the community that they have been part of for many years.
- 31 By being located in or close to residential or mixed use commercial areas, residents are also able to access the services and amenities that these areas provide.
- 32 Accordingly, Ryman's villages include a range of retirement living and care options, including townhouses, independent apartments, serviced apartments, rest home care, hospital care and dementia living care. Ryman provides a 'continuum of care' from independent lifestyles through to 24-hour nursing care. The ability to provide this continuum of care within the same site is very important as it means that our residents only need to make one move. It also allows couples to remain close to each other despite any differences in the level of care that they need individually.

- 33 In addition, Ryman provides extensive on-site village amenities including entertainment activities, recreational activities, a bar and restaurant, communal sitting areas, and large, attractive landscaped areas.
- 34 Because of the comprehensive care nature of Ryman’s villages, all of the communal amenities and care rooms need to be located in a central village centre building to allow for safe and convenient access between these areas. This operational requirement results in a density and layout that differs from a typical residential development. However, Ryman’s retirement villages are integrated developments, which often creates opportunities to achieve higher quality residential outcomes compared to typical residential developments (which I discuss later in this evidence).
- 35 I also note that Ryman does not consider itself a developer, as it is responsible for the whole-of-life of its retirement villages. This timeframe spans the acquisition of land, through the design and consenting processes, to construction, through to all aspects of operation and maintenance of the accommodation, care and amenities within villages. As both a constructor and operator of retirement villages, Ryman has a long-term interest in its villages, its residents and the communities its villages are located in.
- 36 We are also committed to the Western Bay of Plenty region’s prosperity, and providing the highest wellbeing we can for the region’s older population. We expect growth and investment in the greater Bay of Plenty area, including the Western Bay of Plenty District.
- 37 Our villages will also provide ongoing benefits during construction and operation, with staff being employed to manage and operate the villages, and local suppliers being used to provide goods and services. For example, at our Cambridge site, there are, on average, 150-200 Ryman staff and contractors working on construction, depending on the stage of construction. At peak stage there could be anywhere from 300-400 people onsite. Many of these roles are filled by locals. The total investment of construction costs for our Cambridge village is approximately \$200 million. The village will also allow around 300-400 homes to be released back to the market. Ryman also invests in the local economy by supporting local organisations and projects, such as sponsoring the sports clubs and the Residents Association activities.

INCREASING DEMAND FOR RETIREMENT VILLAGES

- 38 Retirement villages are urgently needed in the region, as well as across the country. As outlined by Mr Collyns and Professor Kerse, Bay of Plenty, including the Western Bay of Plenty District, (and New Zealand overall) is facing a retirement village crisis. Ryman’s key interest in PC92 is therefore to ensure that the Plan enables and

provides fit for purpose provisions for retirement village development and related activities in all appropriate locations. This is critical to accelerate much needed housing in the Bay of Plenty region, including the Western Bay of Plenty District, as directed by the Enabling Housing Act.

- 39 Mr Collyns sets out the facts and figures evidencing the growing demand for retirement villages in New Zealand and in the region, including the Western Bay of Plenty District.
- 40 Ryman supports this evidence, noting that we have long waiting lists of people wanting to live at our villages. By way of example, Ryman was recently granted consent for a new comprehensive care retirement village at a site in Karori, Wellington City. At the time of the consent hearing, Ryman already had a list of over 440 people who had expressed an interest in living in the village. This number has since risen to 706 people. This interest was without any official marketing. Ryman also experienced a similar level of interest for its recent village to begin construction in Cambridge, with 126 people on the waitlist without any official marketing.
- 41 This strong interest shows the desperate need for comprehensive care retirement villages. I would go so far as to say the current under-provision of care across the region is at a crisis point and needs to be urgently addressed. This crisis has been exacerbated by the closure of a number of older care homes in the region, as well as the COVID-19 pandemic, placing further demand on the remaining providers and emphasising the need for new facilities. The existing supply of care is also decreasing due to closures of small, poor quality, aged care homes of the past, which are usually conversions of old houses that simply are not up to standard.
- 42 Providing accommodation and care for the ageing population is a critical social issue. In my opinion, society has an obligation to provide housing for all members of society and to ensure that older people are adequately provided for. The importance of providing more retirement accommodation and care in the Western Bay of Plenty District to meet the needs of an ageing population needs to be expressly recognised in all appropriate zones.
- 43 As outlined by Mr Collyns, the government has expressly recognised that housing and caring for the ageing population is a key housing challenge. Specific recognition in the Western Bay of Plenty District Plan will ensure that more high quality retirement living options are available to house the ageing population. Further, this policy approach has already been successfully adopted in other districts, such as Christchurch.²
- 44 I also note that as Ryman residents move into a village, they sell

² Policy 14.2.1.8 of the Christchurch District Plan focuses on the “provision of housing for an aging population”.

their family home. Every new Ryman village will release approximately 300 to 400 family homes back onto the market to be more efficiently used again by families desperate for homes. This outcome will assist with the housing crisis. It will also contribute to alleviating housing affordability issues in the Western Bay of Plenty District.

- 45 Ryman does not have any active construction underway in the Western Bay of Plenty District. However, we think further development of new villages is needed to meet the longer-term predicted shortfall. In the meantime, the crisis is worsening and the supply gap is widening. I know from the many enquiries we receive that many older people are being deprived of appropriate care and companionship at a stage of their lives when they are most in need.

KEY CHALLENGES FACED IN RETIREMENT VILLAGE DEVELOPMENT AS RELEVANT TO PC92

- 46 Ryman has a breadth of experience in planning processes across New Zealand. We have faced an array of consenting challenges that we consider are instructive in the present process.
- 47 The Council Officer's Report considers PC92 contains adequate provisions for retirement villages within the Ōmokoroa and Te Puke Medium Density Residential Zone that reflect the scale and complexity often associated with them.³
- 48 In response, I wish to highlight some of the consenting challenges that we face, which lead to lengthy and unnecessarily complex consent processes. These include:
- 48.1 Lack of recognition that retirement villages are a fully residential activity;
 - 48.2 Overly restrictive/complex urban design controls;
 - 48.3 The lack of provision for the day-to-day needs of older residents;
 - 48.4 The lack of enablement and efficient use of suitable sites;
 - 48.5 Notification issues with village consent applications; and
 - 48.6 Inconsistent provisions across the country;
 - 48.7 Unfair financial contributions
- 49 These matters are addressed in more detail below.

³ Page 17 – Section 42A Report, Plan Change 92 - Ōmokoroa and Te Puke Part 2 (Definitions, Activity Lists and Standards), dated 11 August 2023.

Retirement villages are residential activities, including services and amenities

- 50 As outlined by Mr Collyns, retirement villages are clearly residential in nature. They provide permanent living accommodation to residents. Our residents describe the villages as their homes, including those people living in higher care accommodation, such as hospital areas or serviced apartments.
- 51 Retirement villages provide a range of ancillary activities, but these are primarily for residents and their visitors. These are important amenities and services as many residents are frail or have mobility restrictions (making it more difficult for them to travel to access amenities and services). These services are not available to the general public.
- 52 However, Ryman has faced challenges in consent processes where retirement villages are viewed as a mixed residential and commercial or hospital use. This confusion has led to lengthy debates about activity status and assessment requirements and has generally increased the risk of Ryman obtaining consents.
- 53 Because of the poor provision for our villages, council officers often seek to find that the application warrants treatments as a special circumstance for notification purposes even where all of our effects have been mitigated to very low levels.
- 54 Based on Ms William's evidence I am concerned that the existing definitions in PC92 and lack of clarity in the policies will cause similar issues.
- Urban design controls**
- 55 Ryman has a long and positive track record and understanding of what works for our residents. Over many years we have provided high quality environments for residents, developing sites to be sympathetic to the amenity of surrounding neighbourhoods.
- 56 By way of example, Ryman's recent Cambridge village required careful consideration of the relevant planning standards applicable at the time, and involved significant setbacks with heights ranging from mostly single storey to some two storey elevations. Ryman ensured a high quality design at the edges of the site to interact and blend in with neighbouring properties. I have included in **Appendix A** the site plan for our Cambridge village, and in **Appendix B**, some virtual images of the site. These plans and images highlight Ryman's village layouts, general design features used, and our compliance with the development standards applicable at the time. In my view, this village would be significantly underdeveloped in the context of the MDRS.
- 57 Despite Ryman's careful design approach, communities (particularly

neighbouring landowners) and council officers can have an expectation as to how vacant sites are going to be used. Typically, that expectation is not for medium or higher density retirement accommodation. In some cases, council officers may even attempt to redesign the village layout and focus on internal amenity issues which are best left to us as the specialist operator.

- 58 In part, this is because, traditionally, planning provisions have ignored the unique features of retirement villages. As a result, consenting of retirement villages has been unnecessarily complex and time consuming. Using the recent Karori experience, I note that Ryman made a significant effort to produce a high quality architectural design which made a positive contribution to the surrounding neighbourhood. We provided generous setbacks, and building forms which complied with height in relation to boundary controls, and which were thoughtfully stepped up in height on sensitive neighbouring boundaries.
- 59 Despite those design features, many submitters still argued that there should be even greater setbacks and height reductions. Submitters opposed to our Karori Village sought greater setbacks and building heights well below the permitted thresholds of the relevant building standards. Some submitters were seeking setbacks 10 times greater than the Plan setback standards. These requests were thankfully rejected by the decision-maker, but took up considerable hearing time and caused major delays overall.
- 60 These issues emphasise the need for fit for purpose retirement village provisions that recognise the unique features of retirement villages. 'Standard' assessment criteria for residential developments or overly restrictive design controls are often unsuited to the assessment of retirement villages that also incorporate amenities for residents and assisted care units.
- 61 That said, we acknowledge that urban design control is still needed in the consent process to achieve quality development outcomes, provided it is sufficiently clear and proportionate. Ms Williams addresses the District Plan controls in more detail.

Day to day needs of residents in retirement villages

- 62 Retirement villages have unique functional and operational needs due to the day to day living needs of residents. Planning for retirement villages therefore does not necessarily align with all of the typical internal amenity controls for residential development. This is why we seek a definition of "retirement units".
- 63 A retirement village layout is influenced by a broad range of complex factors. For example, accessible and often undercover pathways between car parking areas and buildings enable residents to safely and comfortably manoeuvre around the village. Some areas of a village need to be secure and separate from other parts of the village, such as areas catering to residents with dementia.

Village layouts also need to practically accommodate the care requirements of residents (including distances that allow for staff assistance and access to medical facilities).

- 64 Our retirement villages often require longer building lengths than standard multi-unit developments. This is because areas that provide aged care need to be connected to allow healthcare workers and residents to move between different aged care rooms. Separate buildings for aged care units are therefore not appropriate.
- 65 We also ensure our villages provide visual interest that residents can enjoy no matter where they are located. Typical internal amenity controls can conflict with the functional and operational requirements that are unique to retirement villages.
- 66 Further, residents in retirement villages have a range of care needs. Therefore, while independent living townhouses and apartments will include full kitchens, bathrooms, lounges and other household amenities, care suites and rooms will not always have these amenities. These factors may be a key driver for the layout and amenities within a unit. In addition, as noted above, the villages often include a wider range of communal amenities and services for resident needs and convenience.
- 67 Because of resident vulnerability, we also prioritise our residents' safety and security, meaning there are strict controls over access to our villages. For similar reasons, we also do not design in public roads through our sites, unless absolutely necessary.
- 68 The special needs of residents and the fact that residents generally spend most of their time indoors, also means that Ryman provides a much higher level of indoor communal living areas than typical developments. The provision for these areas, which are much better suited to the wants and needs of the residents, should be accounted for in the Plan, instead of focussing only on outdoor living areas.
- 69 In terms of outlook space, this is very dependent on unit type. For example higher care units will not have the same outlook space as independent units. That said, we provide all the amenities that residents need onsite and have their wellbeing front and centre when designing different units.

Lack of suitable sites

- 70 The Council Officer Report considers that the intent of the Ryman and the RVA's proposed larger sites policy is unclear and also seeks to limit access to sites in commercial zones for retirement villages.⁴⁴ I disagree with this approach.

⁴ Page 31 - Section 42A Report, Section 14A – Ōmokoroa and Te Puke, Part 1 (Section Labelling, Statement, Objectives, Policies), dated 11 August 2023.

- 71 As noted, retirement villages are a residential use, and are generally located in residential and mixed use commercial areas where there is demand generated by the residents living in or near those areas. Ryman’s experience is that, in their retirement, older people want to stay in or close to the communities where they currently live and where they have already significantly contributed throughout their lives as part of the local community. As Mr Collyns notes, they want to remain close to their families, familiar amenities and other support networks and want to “age in place”.
- 72 However, sites that are appropriate for retirement villages are rare due to size and locational requirements. Within the Bay of Plenty region in particular there is a general lack of suitable sites for comprehensive care retirement villages. This is particularly the case in existing residential areas. As such, other sites outside of residential zones, such as commercial and mixed used zones, that provide good amenity and access to services will also be considered by Ryman.
- 73 For reasons already noted, we are also able to use a variety of design techniques to increase height and density in parts of our sites that will not impact the external environment. This flexibility means we can use larger sites much more efficiently.
- 74 A ‘piecemeal’ approach where larger sites are divided up for smaller developments would represent a missed opportunity for a more comprehensive and integrated development. As noted in the RVA’s submission, the Auckland Unitary Plan includes a policy to enable more efficient use of larger sites and we have used this effectively in subsequent consent processes.⁵
- 75 Further, if retirement villages are encouraged and enabled across all appropriate zones, including commercial and mixed use zones, we will have access to many more potentially suitable sites for further intensification.
- Notification**
- 76 I understand that the District Plan does not directly address the notification of applications for retirement villages. However, it acknowledges that the construction of four or more residential units that comply with the density standards cannot be publicly or limited notified.
- 77 As noted, retirement villages are residential in nature. I therefore consider that retirement villages should be dealt with in the same manner as other multi-unit residential developments (i.e. four or more residential units).

⁵ Auckland Unitary Plan, H3.3(8), H4.3(8), H5.3(9).

- 78 Ryman also works hard to ensure its villages respond to, and work with, the surrounding environment and meet planning expectations. Because retirement villages are a comprehensive style of residential development, they can fit well and can work in a variety of urban environments.
- 79 I note that notification processes create significant consent hurdles. They create a disincentive to development and add delays, costs and uncertainties. There is currently a significant time lag between early planning and construction stages of Ryman's developments. A fully developed comprehensive care retirement village is around a six to eight year project; provided that the timeframes and resource consent process go smoothly. We estimate the resource consent process takes on average 12-18 months for notified consents and around 6 months for non-notified consents. Our Linda Jones village in Hamilton (which was notified) took over 18 months from lodgment to consent whereas our unnotified consent for our new Cambridge village took only approximately 6 months.
- 80 If there is significant opposition to a development proposal, or other unforeseen delays in the consenting process, a development proposal can take even longer to reach fruition. This situation occurred for our Karori village in Wellington, where a decision was made almost three years after the application was lodged. As noted, the notification process enabled arguments to be made that were not material or relevant to the consent process.
- 81 To avoid these lengthy and unnecessary debates, Ryman considers it is of utmost importance that PC92 treats retirement villages in the same ways as other multi-unit residential activities for notification purposes. We acknowledge that if development standards are breached, then limited notification should be considered if the adverse effects are sufficiently material.

Consenting pathways vary hugely across planning frameworks

- 82 Another key challenge for Ryman is the inconsistent retirement village planning frameworks across New Zealand. This issue is discussed by Mr Collyns in more detail, and his evidence is supported by Ryman's experience with consenting processes across the country.
- 83 This inconsistency ultimately leads to delays and costs during consent processes, which does not enable the speedy and efficient delivery of housing. As a result, Ryman, in support of the RVA, has been and is heavily involved in plan changes, including the intensification planning instruments, across the country to seek consistency across district plans.

Financial contributions – need to ensure contributions are proportionate to demand

- 84 Ryman has no issue paying Council contributions for the impacts of its villages on Council services. However, these charges need to be fair and robustly justified.
- 85 Ryman frequently faces issues engaging with Council staff who seek to apply 'standard' calculations to determine financial contributions (and development contributions) for our villages. These standard calculations do not recognise that retirement villages place substantially lower demands on community infrastructure and facilities than standard residential developments. This feature is due to both lower occupancy levels and reduced activity levels of the residents. The very low demand of our villages was confirmed in a development contribution objection case in Auckland.⁶
- 86 There are retirement-village specific provisions in the District Plan that allows for lower occupancy levels, but not for the lower demand profile. However, in my experience, the charges significantly overstate our impact on and use of council services. A fairer and clearer regime will enable us to more accurately assess development feasibility when planning our villages and ensure we are paying a reasonable amount. Mr Akehurst addresses these matters in more detail.

RYMAN'S SUBMISSIONS ON VARIATION 3

- 87 Overall, Ryman's submissions focus on the need for PC92 to adequately address the critical need for appropriate housing for the rapidly increasing ageing population. Ultimately, Ryman considers that PC92 must provide a clear and consistent enabling regime for retirement villages.
- 88 To that extent, Ryman supports in full the relief sought by the RVA. Ryman agrees that amendments to PC92 are required to provide appropriate recognition of the importance of, and need for, retirement villages. The specific changes sought by the RVA and Ryman will be addressed in Ms Williams' statement of evidence.

Matthew Brown
25 August 2023

⁶ Decision by the Development Contributions Commissioners on an objection made by Ryman Healthcare to Auckland Council (dated 10 August 2018), paragraphs 74-79.

A
NORTH



LOCATION PLAN

SITE INFORMATION

SITE AREA: 8.5973ha(85,973m²) APPROX.
SITE ADDRESS: 1881 CAMBRIDGE ROAD, CAMBRIDGE



SITE LEGEND

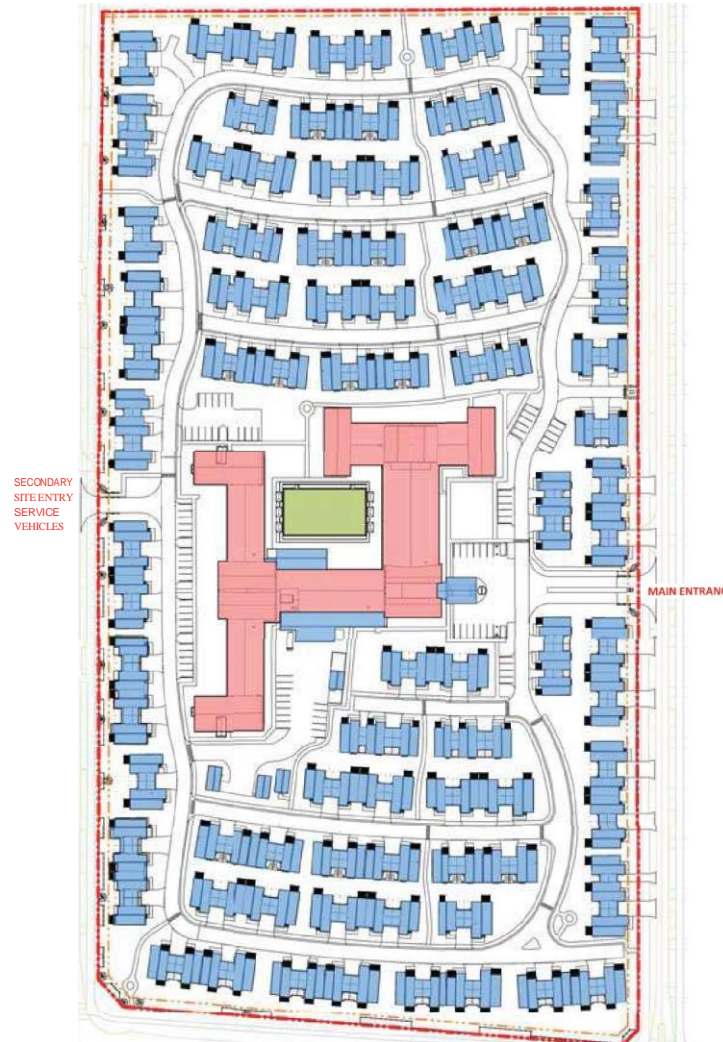
LEGAL BOUNDARIES
BOUNDARY SETBACKS

SITE NOTES

1. THIS SHEET IS TO BE READ IN CONJUNCTION WITH THE PROPOSED BUILDINGS TYPE SITE PLAN
2. LOCATIONS OF NEW CONNECTOR ROAD/S + CIVIL WORKS OUTSIDE THE SITE IS SUBJECT TO THE RELEVANT LA APPROVALS BY OTHERS
3. LANDSCAPING - TREES SHOWN ARE INDICATIVE ONLY, REFER TO LANDSCAPE DESIGN PLANS + DETAILS

LEVELS LEGEND

1 LEVEL 
2 LEVELS 



C) SITE PLAN + ROOF + BUILDING LEVELS PLAN
A18000000 - 1 ICCI

AMENDMENTS
A 01.10.21 RESOURCE CONSENT ISSUE

LOCATION
1881 CAMBRIDGE ROAD - CAMBRIDGE

BLOCK NO S01 AMENDMENT A

PROJECT NO 048 STAGE 0

PDF NAME 048 - RCT S01

SCALE As indicated DRAWING NO.

DRAWING STATUS
RC09 **A0-055**

DRAWING TITLE
PROPOSED ROOF PLANS + BUILDING LEVELS



92 RUSSELL ROAD, CHRISTCHURCH, NEW ZEALAND
PH: 64-3-3664009

PROPOSED COMPREHENSIVE CARE RETIREMENT VILLAGE - CAMBRIDGE



Apposity





