

Before the Independent Hearings Panel  
Kāpiti Coast District Council

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*under:* the Resource Management Act 1991

*in the matter of:* Submissions and further submissions in relation to Plan Change 2 to the Kāpiti Coast District Plan under the Resource Management Act 1991, Schedule 1 Subpart 6.

*and:* **Ryman Healthcare Limited**

*Submitter 197*

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

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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.
- 6 I am familiar with Plan Change 2 to the Kāpiti Coast District Plan (*PC2*) as it relates to the submissions lodged by Ryman and the Retirement Villages Association of New Zealand (*RVA*). I also note that I have read the Council Officers’ planning evidence as far as they relate to the RVA’s and Ryman’s submissions, in particular section 4.6.2 on Retirement Villages.

### **SCOPE OF EVIDENCE**

- 7 My statement includes an overview of Ryman and our villages and residents. I also highlight our experiences with consenting processes, including in the Wellington region, and address Ryman’s key submissions on PC2.

### **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, including the 460 residents living at our Charles Fleming Village in Waikanae. We offer a comprehensive ‘continuum of care’

model that allows people to stay in one place as their health care needs change.

- 9 Ryman's existing and expected villages in the Wellington region combined will provide homes for over 1,920 of the region's ageing residents. Ryman is committed to continuing to provide the highest quality housing and care for Wellington's older residents. We expect continued growth and investment in the region, including in Kāpiti Coast District (*District*). Ryman therefore has a significant interest in how PC2 provides for retirement villages and aged care in the Kāpiti Coast 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 Wellington region and Kāpiti Coast District are 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. These aspects lead to specific functional, operational and locational requirements. Our villages tend to be medium to high density as a result.
- 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 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 without impacting our neighbours.
- 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 two 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.
- 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 In terms of PC2, there appear to be some significant misunderstandings by the Council Officer regarding the nature and features of retirement villages. I note that I disagree with the Officer’s categorisation of a retirement village as a ‘bundle of activities’ that need to be considered separately at the consent stage. I also strongly disagree that our retirement villages contain commercial or retail activities. The villages we build contain a range of ancillary services, but these are for the residents and their guests. Ultimately, our residents view the villages they live in as their homes.
- 18 These sorts of basic misunderstandings emphasise the need to ensure that planning frameworks clearly provide for retirement villages using consistent, clear and efficient provisions. Ultimately, the changes sought by Ryman and the RVA are intended to improve and streamline consent processes to ensure the speedy delivery of housing, without taking out the necessary safeguards to manage potential effects.
- 19 I note in that regard that the current PC2 planning regime would result in our villages requiring consent as either discretionary or non-complying activities. These statuses would be a significant disincentive to future development in the District, given the risks and complexities of obtaining consent. A restricted discretionary activity status would give us much more certainty and confidence in investment.
- 20 Overall, Ryman supports the relief sought by the RVA.

### **RYMAN, ITS RESIDENTS AND THE VILLAGES**

- 21 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 five villages in the Wellington region, with two more in the construction or pre-

construction phases.

- 22 Our villages provide homes for more than 13,200 older residents and employ over 6,700 people. In Wellington, our villages combined will provide a home for over 1,920 people, including 460 residents at our Charles Fleming Village in Waikanae. We have 95 Kāpiti Coast District residents on our waitlists.
- 23 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.
- 24 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 Ms Margaret Owens 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, ranging from those who are independent to those requiring a high level of 24 hour specialist care, such as that provided in our dementia units.
- 25 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.
- 26 The layout and environment of Ryman's villages are therefore designed to meet the specific physical and social needs of older people.
- 27 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.

- 28 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.
- 29 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. 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.
- 30 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.
- 31 In addition, Ryman provides extensive on-site community amenities including entertainment activities, recreational activities, a bar and restaurant, communal sitting areas, and large, attractive landscaped areas.
- 32 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.
- 33 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.
- 34 We are also committed to the Wellington region's prosperity, and providing the highest wellbeing we can for the region's older

population. We expect continued growth and investment in the greater Wellington area, including Kāpiti Coast District.

- 35 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. On average, there are 150-200 Ryman staff and contractors working on our construction sites, depending on the stage of construction. At peak stage there could be anywhere from 300-400 people onsite and many of these roles are filled by locals. 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**

- 36 Retirement villages are urgently needed in the region, as well as across the country. As outlined by Ms Owens and Professor Kerse, Wellington, including Kāpiti Coast District, (and New Zealand overall) is facing a retirement village crisis. Ryman's key interest in PC2 is therefore to ensure that the District Plan enables and provides a fit for purpose framework for retirement village development and related activities in all appropriate locations. This is critical to accelerate much needed housing in the Wellington region, including Kāpiti Coast District, as directed by the Enabling Housing Act.
- 37 Ms Owens sets out the facts and figures evidencing the growing demand for retirement villages in New Zealand and in the region, including Kāpiti Coast District.
- 38 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 nearby 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. It came from local word of mouth that we had acquired the site. Ryman also experienced a similar level of interest for its other villages in Kilbirnie, Khandallah, Waikanae Petone, and Lower Hutt. At our Waikanae Village (Charles Fleming), we currently have a waiting list of 276 people.
- 39 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.

- 40 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 Kāpiti Coast District to meet the needs of an ageing population needs to be expressly recognised in all appropriate zones.
- 41 As outlined by Ms Owens, the government has expressly recognised that housing and caring for the ageing population is a key housing challenge. Specific recognition in the 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.<sup>1</sup>
- 42 I also note that as Ryman residents move into a village, they sell 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, and will contribute to alleviating housing affordability issues in the district.
- 43 Ryman has a large pipeline of units for development in the Wellington region over the next 4-5 years. This development pipeline will go some way to alleviate the short-term anticipated shortfall in the supply of quality aged care and living options in the Kāpiti Coast District. However, further development of new villages, beyond the current pipeline and within Kāpiti Coast District, 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**

- 44 Ryman currently owns and operates the Charles Fleming retirement village within the Kāpiti Coast District, and four other retirement villages in Wellington and Lower Hutt. We recently consented a further new village in Karori, located at the western edge of Wellington City, and are planning another village in Newtown.

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<sup>1</sup> Policy 14.2.1.8 of the Christchurch District Plan focuses on the “provision of housing for an aging population”.



- 45 Ryman therefore has a breadth of experience in planning processes in the Wellington region, as well as across New Zealand. We have faced an array of consenting challenges that we consider are instructive for the Panel.
- 46 Key challenges particularly relevant to PC2 are the lack of understanding of the unique characteristics of retirement villages, the lack of suitable sites, and lengthy and unnecessarily complex consent processes. The approach of seeking to break up retirement villages, into separate uses as is proposed here, is particularly problematic. These matters are addressed in more detail below.

**Retirement villages are residential activities**

- 47 As outlined by Ms Owens, retirement villages are clearly residential in nature. They provide permanent living accommodation to residents. Our residents describe the villages as their homes.
- 48 The failure to explicitly recognise that retirement villages are a residential activity is a key issue with many district plans. This issue has been raised once again, with the Council Officer's Planning Evidence considering that retirement villages should be considered as a 'bundle of activities'.<sup>2</sup> With respect, I strongly disagree.
- 49 As noted, retirement villages provide a range of ancillary activities, but these are primarily for residents and their visitors. Ryman's retirement villages, for example, often include a wider range of amenities and services for resident needs and convenience. 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.
- 50 However, Ryman has faced challenges in consent processes where retirement villages are viewed as a mixed residential and commercial or hospital use – which also appears to be the view of the Council Officer. This confusion has led to lengthy debates about activity status intensification and assessment requirements and has generally increased the risk of Ryman obtaining consents.
- 51 By way of example, when consenting our retirement village in Northwood, Christchurch, early discussions with Council were required to confirm and agree that the retirement activity was in fact a residential use and could be assessed under the relevant residential provisions. We also spent considerable time and effort during our recent Park Terrace resource consent process addressing submitter allegations that a retirement village was not a residential use. In both cases, the Council and the relevant decision-maker agreed that our villages are a residential activity, but getting there was hugely inefficient. In the Wellington context, our Petone village

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<sup>2</sup> Council Officer's Planning Evidence, Paragraph 337.

faced multiple submissions from neighbouring residents that the village was a commercial activity. 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.

- 52 To avoid these lengthy and unnecessary debates, Ryman considers it is of utmost importance that the District Plan expressly recognises that retirement villages are residential activities and that the activity is treated as a whole, rather than being broken up into different activities.

**Retirement villages are residential, but different to typical dwellings**

- 53 Retirement villages are residential activities, but because of their unique functional and operational needs, they do not necessarily fit in with typical urban design rules for residential development.
- 54 As noted, Ryman’s retirement villages, for example, are usually medium to high density in order to properly cater for resident needs. 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.
- 55 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.
- 56 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.
- 57 However, 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 that zoning provisions allow for. 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.

- 59 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.
- 60 However, despite those features, many submitters still argued that there should be even greater setbacks and height reductions, 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.
- 61 These issues emphasise the need for fit for purpose retirement village provisions that recognise the unique features of retirement villages. 'Standard' design guidance documents for residential developments are wholly unsuited to the assessment of retirement villages that also incorporate facilities for residents and assisted care units.
- 62 I also record that I do not agree with the Council Officer's assessment that the residential features of retirement villages could be contrary to the purpose of a Centre and Mixed zone,<sup>3</sup> yet ancillary aspects of retirement villages could be contrary to policy direction in residential zones.<sup>4</sup> It is my experience, that the opposite is true. The unique features of retirement villages as a comprehensive residential development means that retirement villages fit well and can work in a variety of urban environments.
- 63 It would also be a mistake to assume there is only one 'form' of retirement village. As explained above, Ryman works hard to ensure its villages respond to, and work with, the surrounding environment. Overly prescriptive standards, or reference to residential design guides, can significantly restrict innovative and appealing design solutions.
- 64 I also do not agree that the nature and scale of a retirement village could lead to large parts of a Centre or Mixed Use zone being 'subsumed' to the extent the zone is unable to function as a centre.<sup>5</sup> It is my experience that Ryman's villages are good neighbours and fit in well with the planned character of the area. Further, many of our residents prefer to not travel long distances, so the presence of a retirement village is likely to improve the use and vitality of nearby centres.

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<sup>3</sup> Council Officer's Planning Evidence, Paragraph 346(a).

<sup>4</sup> Paragraph 342.

<sup>5</sup> Paragraph 347.

### **Lack of suitable sites**

- 65 I note that the Council does not agree it is appropriate to provide policy guidance to recognise the intensification opportunities provided by larger sites.<sup>6</sup>
- 66 The relief sought is in part due to the lack of suitable sites to provide for retirement villages. 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 Ms Owens notes, they want to remain close to their families, familiar amenities and other support networks and want to "age in place".
- 67 However, sites that are appropriate for retirement villages are rare due to size and locational requirements. Within the Wellington 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.
- 68 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, meaning we can use larger sites much more efficiently.
- 69 It is thus important that the District Plan expressly recognises the intensification opportunities provided by larger sites. As noted in the RVA's submission, this approach was adopted in the Auckland Unitary Plan, which includes a policy to enable more efficient use of larger sites.<sup>7</sup> Retirement villages must also be encouraged and enabled across all appropriate zones, including commercial and mixed use zones.

### **Time to consent and build retirement villages**

- 70 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.

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<sup>6</sup> Council Officer's Planning Evidence, Paragraph 353.

<sup>7</sup> Auckland Unitary Plan, H3.3(8), H4.3(8), H5.3(9).

- 71 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, where a decision was made almost three years after the application.
- 72 In Ryman's experience, delays often occur during resource consent processes due to unclear or ill-fitting plan provisions for retirement villages. These delays are frustrating and costly for all involved, not least for those older community members who are living in unsuitable or inappropriate accommodation while they wait for a retirement village to be completed.

**Consenting pathways vary hugely across planning frameworks**

- 73 Another key challenge for Ryman is the inconsistent retirement village planning frameworks across New Zealand. This issue is discussed by Ms Owens in more detail, and her evidence is supported by Ryman's experience with consenting processes across the country.
- 74 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.

**Financial contributions**

- 75 I note the Council Officers do not consider any further changes are required to the proposed financial contributions provisions.<sup>8</sup> It is Ryman's experience that the dual financial contributions / development contributions regimes unfortunately provide large scope for overlap and confusion. Any increased clarity that can be provided to ensure there is no overlap, or scope for 'double dipping' between the two regimes would provide improved certainty for developers.
- 76 Ryman also frequently faces issues engaging with Council staff who seek to apply 'standard' calculations to determine financial 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 due to lower occupancy levels and reduced activity levels of the residents. The very low demand of our villages was

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<sup>8</sup> Council Officer's Planning Evidence, Appendix B14 / section 4.17: financial contributions.

confirmed in a development contribution objection case in Auckland.<sup>9</sup>

- 77 The inclusion of retirement-village specific provisions in the District Plan that allows for this lower demand profile would substantially ease the calculation of financial contributions, and reduce the need for Ryman to provide the same supporting information on demand profiles to councils multiple times.

#### **RYMAN'S SUBMISSIONS ON PLAN CHANGE 2**

- 78 Overall, Ryman's submissions focus on the need for PC2 to adequately address the critical need for appropriate housing for the rapidly increasing ageing population. Ultimately, Ryman considers that the District Plan must provide a clear and consistent regime for retirement villages.
- 79 To that extent, Ryman supports in full the relief sought by the RVA. Ryman agrees that amendments to PC2 are required to provide appropriate recognition of the importance of, and need for, retirement villages. The specific changes sought by the RVA and Ryman are addressed in Dr Mitchell's statement of evidence.

**Matthew Brown**  
**10 March 2023**

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<sup>9</sup> Decision by the Development Contributions Commissioners on an objection made by Ryman Healthcare to Auckland Council (dated 10 August 2018), paragraphs 74-79.