

**SUBMISSION ON PLAN CHANGE 2 TO THE KAPITI COAST DISTRICT PLAN
UNDER CLAUSE 6 OF THE FIRST SCHEDULE TO THE RESOURCE
MANAGEMENT ACT 1991**

To: district.planning@kapiticoast.govt.nz

Name of Submitter: Metlifecare Limited

Address: c/- MinterEllisonRuddWatts
PO Box 105249
Auckland 1143
Attention: Bianca Tree

Telephone No: (09) 353 9700

Email: bianca.tree@minterellison.co.nz

For office use only

Submission No:

207



INTRODUCTION

1. This is a submission on Proposed Plan Change 2 to the Operative Kapiti Coast District Plan 2021 (**Plan Change**) on behalf of Metlifecare Limited (**Metlifecare**). The Plan Change was notified by the Kapiti Coast District Council on 18 August 2022.
2. This submission relates to the provisions in the Plan Change relating to the use and development of retirement villages and associated infrastructure in the district.
3. Metlifecare could not gain an advantage in trade competition through this submission.

BACKGROUND TO METLIFECARE

4. Metlifecare was established in 1984 and is a leading owner and operator of 33 retirement villages and 18 care homes in New Zealand. Metlifecare focuses on providing outstanding care and ensuring the comfort, happiness and wellbeing of its residents by developing and maintaining high quality housing and creating dynamic, vibrant and diverse social communities for older people throughout New Zealand.
5. Metlifecare operates using a range of different development models which generally include a variety of residential unit layouts ranging from apartments and townhouses for independent living, through to assisted living apartments and residential care homes with rest home to hospital level care for residents who need additional assistance.

6. Metlifecare is actively providing feedback to all councils on their district plans to recognise and provide for retirement villages in appropriate locations based on their broad experience across New Zealand.
7. Most relevantly to this submission, Metlifecare owns and operates Coastal Villas at Spencer Russell Drive, Raumati Beach Paraparaumu and Kapiti Village at 1 Henley Way, Paraparaumu.
8. Both sites are located in the General Residential zone. Under the Plan Change:
 - (a) Residential Intensification Precinct A would apply to the Coastal Villas site; and
 - (b) An existing qualifying matter, relating to flood hazards (ponding and stream corridor or storage areas), would apply to parts of the sites.

SUMMARY OF SUBMISSION

9. Retirement villages are communities specifically designed to cater to the needs and lifestyles of older people who are some of the most vulnerable members of the community. As New Zealand's population grows and ages, and life expectancy increases, the continued supply of retirement village housing will be crucial to ensure that the elderly population have suitable housing and a level of care that meets their needs.
10. The wider community also benefits from the provision of retirement villages. For example, they release pressure on social and health services and contribute to employment in New Zealand, both in the construction sector and day-to-day operations. They also have a crucial role in the general housing market because the supply of retirement village housing releases existing housing stock back into the market.
11. Metlifecare considers that amendments are required to the Council's Intensification Planning Instrument (**IPI**) to ensure it better integrates with the Operative Plan and better recognises the concerns around a lack of housing supply which lead to the development of the National Policy Statement on Urban Development 2020 (**NPS-UD**) and Resource Management (Enabling Housing and Other Matters) Amendment Act 2021 (**Amendment Act**).

12. In particular:
- (a) Metlifecare does not consider that the IPI has sufficiently recognised the value of retirement villages and their role in providing housing for older persons. It therefore seeks that specific provisions are incorporated into the IPI which align with the Amendment Act and better enable retirement village development;
 - (b) Metlifecare supports the application of the Medium Density Residential Standards to the General Residential zone and the application of Residential Intensification Precincts to certain sites across Kapiti; and
 - (c) Metlifecare seeks to ensure that the policies and rules applicable to retirement village development recognise and provide for the functional and operational needs of this type of development.
13. Metlifecare also suggests that further consideration is given to the language used in the Plan Change to ensure it aligns with this particular plan – for example, using the phrase “relevant residential zones” is unnecessary when the General Residential zone is the only relevant residential zone.
14. The specific provisions that are supported or opposed, and the amendments sought to the Plan Change are set out in the table attached as **Appendix 1**.

REASONS FOR RELIEF SOUGHT

15. The reasons for the relief sought is set out in **Appendix 1**. In addition to those specific reasons, the amendments sought are to ensure that the Plan Change:
- (a) will give effect to the objectives and policies of the NPS UD;
 - (b) will contribute to well-functioning urban environments;
 - (c) is consistent with the sustainable management of physical resources and the purpose and principles of the RMA;
 - (d) will meet the requirements to satisfy the criteria of section 32 of the RMA;
 - (e) will meet the reasonably foreseeable needs of future generations; and
 - (f) is consistent with sound resource management practice.

DECISION SOUGHT AND HEARING

16. The relief sought by Metlifecare is set out in **Appendix 1**. In addition to that specific relief, Metlifecare seeks such other additional or consequential relief to give effect to the matters raised in this submission.
17. Metlifecare wishes to be heard in support of its submission. If others wish to make a similar submission, Metlifecare will consider presenting a joint case with them at the hearing.

DATED this 27th day of September 2022

Metlifecare Limited by its solicitors and duly
authorised agents MinterEllisonRuddWatts



Bianca Tree

Address for service

Metlifecare Limited
c/- MinterEllisonRuddWatts
PO Box 105 249
AUCKLAND 1143
Attention: Bianca Tree

Telephone No: (09) 353 9700
Fax No. (09) 353 9701
Email: bianca.tree@minterellison.co.nz

APPENDIX 1: Metlifecare's submission on Plan Change 2 to the Kapiti Coast District Plan

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decisions requested / relief sought
District Objectives Chapter	New DO-Ox3 – Residential Intensification Precincts	Support	Metlifecare supports the provision of residential intensification precincts which provide for increased building height and density within parts of the General Residential Zone that are located within the areas to which policy 3 of the NPS-UD applies.	Retain DO-Ox2 as notified.
	DO-O11 – Character and Amenity Values	Support	Metlifecare supports the amendment to DO-O11 to recognise that character and amenity values change over time.	Retain DO-O11 as notified.
Strategic Direction - Urban Form and Development	UFD-Px - Urban Built Form	Support in part	<p>Metlifecare generally supports this new strategic direction. However:</p> <ul style="list-style-type: none"> The purpose of this strategic direction is to clarify where development is enabled. It should be made clear that development should be enabled on larger sites because they provide intensification opportunities and provide for more efficient use of those sites. the comments made about the nature of qualifying matter areas does not align with the Amendment Act and are otherwise not appropriate. Qualifying matter areas are used to identify areas where a specified territorial authority <i>may</i> make the MDRS and relevant building height or density requirements less enabling to the extent necessary to accommodate a qualifying matter. They are not necessarily applied to areas where development should be avoided. 	<p>Amend UFD-Px as shown in red below:</p> <p>Provide for heights and densities of urban built form that enable more people to live in, and more businesses and community services to be located in, the District's urban environments, by:</p> <ol style="list-style-type: none"> enabling the greatest <i>building</i> heights and densities in the <i>Metropolitan Centre Zone</i>, including <i>buildings</i> up to 12-storeys; enabling greater <i>building</i> heights and densities within a walkable catchment of the <i>Metropolitan Centre Zone</i> and the train stations at Paekākāriki, Paraparaumu and Waikanae, including <i>buildings</i> up to 6-storeys; enabling greater <i>building</i> heights and densities in the <i>Town Centre Zone</i>, including <i>buildings</i> up to 6-storeys; enabling increased <i>building</i> heights and densities in the <i>Local Centre Zone</i>, including <i>buildings</i> up to 4-storeys; enabling increased <i>building</i> heights and densities adjacent to the <i>Town Centre Zone</i> and <i>Local Centre Zone</i>, including <i>buildings</i> up to 4-storeys; and enabling a variety of <i>building</i> heights and densities in the General Residential Zone, including <i>buildings</i> up to 3-storeys; <u>enabling more intensive development on larger sites to provide for the efficient use of those sites.</u> <p>while <u>recognising it may be appropriate to be less enabling of development to accommodate an identified avoiding inappropriate buildings, activities, heights and densities within qualifying matter areas.</u></p>
	UFD-P2 – Housing Choice	Support	Amendments are proposed to be made to clarify that the intention is to encourage high amenity values rather than maintain high amenity values. Metlifecare supports this amendment as it is consistent with policy 6(b) of the NPS UD.	Retain UFD-P2 as notified.
	UFD-P3 – Managing Intensification	Support	Metlifecare supports the amendments made to this provision as it provides flexibility for character and amenity values to be considered, where provided for in the District Plan. However, to be consistent and give effect to this, further amendments are required to policies relating to amenity in the General Residential zone provisions (explained below).	Retain UFD-P4 as notified.
	UFD-P4 – Residential Density	Oppose	<p>The detail provided in UFD-P4 unnecessarily restricts future development in Kapiti by potentially limiting areas identified for higher density development.</p> <p>Metlifecare seeks that the strategic direction be broad and that the particular details (including defined areas of growth) are applied through relevant zone provisions in the District Plan.</p>	<p>Amend UFD-P4 as shown in red below:</p> <p>The density of subdivision and development will be managed through an area-specific <u>provisions approach</u> to achieve an appropriate range of housing types, <u>density and form</u> across the District., as set out below:</p> <ol style="list-style-type: none"> the highest densities, including apartments as part of mixed use developments, will be located within and in immediate proximity to centres;


Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decisions requested / relief sought
				<p>2. medium density housing will be limited to specific precinct areas within walking distance of centres higher density development, including multi-storey apartments, will be provided for within a walkable catchment of the Metropolitan Centre Zone, train stations at Paekākāriki, Paraparaumu and Waikanae, and adjacent to the Town Centre Zone and Local Centre Zone;</p> <p>3. focused infill will be encouraged in specific areas where there is good access to shops and services a variety of densities will be provided for in the General Residential Zone;</p> <p>4. within the Neighbourhood Development Areas identified in the Ngārara Development Area Structure Plan in Appendix 7, the provision of affordable housing will be encouraged at appropriate locations with good access to shops and services; and</p> <p>5. traditional low density residential subdivision will be allowed within the general residential area;</p> <p>6. overall existing low densities will be maintained in special character areas identified in GRZP3;</p> <p>7. especially low densities will be applied in Low Density Housing Precinct areas (identified on the District Plan Maps) as transitions between rural and urban environments); and</p> <p>8. in areas where infrastructure constraints exist (such as water, wastewater or roading), densities will reflect those constraints residential densities will reflect be integrated with existing or planned infrastructure capacity.</p>
	UFD-PX	Support	<p>The Strategic Direction Chapter does not explicitly recognise the crucial role that retirement and aged care facilities have in providing for the health and wellbeing of the New Zealand community and the provision of housing for elderly residents.</p> <p>This fails to recognise that the local community benefits from the provision of retirement villages. For example, they release pressure on social and health services and contribute to employment opportunities, both in the construction sector and day-to-day operations. They also allow residents to live in familiar suburbs where they often have family and friends in close proximity. Further, Retirement Villages have a crucial role in the general housing market because the supply of retirement village housing releases existing housing stock into the market and reduces pressure on existing infrastructure.</p> <p>Metlifecare seeks that a new strategic policy is incorporated as UDF-PX to recognise the growing role that retirement villages will have in providing healthy, safe, affordable homes that meet the needs of older people in the community and to meet demand for this type of housing. This should then filter down into other objectives and policies in the Proposed Plan.</p>	<p>Include as UDF-PX (or words to similar effect):</p> <p><u>The housing and care needs of the ageing population are recognised and provided for across the District to meet demand.</u></p>
GRZ – General Residential Zone	Introductory text to the General Residential Zone chapter	Oppose in part	<p>The Amendment Act recognises the need for a range of different housing typologies to meet the day to day needs of the population. In Metlifecare's view, the introduction should not list a fulsome range of housing types but not all potential housing types.</p>	<p>Amend the introduction as follows (or words to similar effect):</p> <p><u>A mix of housing densities are provided for throughout the Zone, with higher densities enabled in areas that are well served by public transport or are close to a range of commercial activities and community services. Housing types anticipated in the Zone include detached housing, semi-detached housing, terrace housing, low-rise apartments, retirement villages and in some areas mid-rise apartments. The development of papakāinga is also provided for within the Zone. The Zone does not promote one form of housing over another but instead provides flexibility to meet the community's diverse housing needs and should reflect the demand for certain types of housing, including retirement villages which provide a range of facilities, housing options, activities, and social and health benefits to suit the needs of older people in the community.</u></p>

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decisions requested / relief sought
	GRZ-PX1 - x5	Support	Metlifecare supports these policies on the basis they are consistent with the Amendment Act.	Retain as notified.
	New policy after GRZ-PX1 - x5	Oppose in part	<p>As further explained below, the matters contained in a Residential Design Guide do not make reference to all types of residential development. It makes no specific reference to retirement villages and fails to recognise or provide for the differing functional and operational needs of retirement villages.</p> <p>The design guide does not provide guidelines relating to retirement village development and should not be applied to this type of development. Any design guide should also not sit within the plan as a matter to be addressed in a policy but sit outside the plan as a guidance tool only.</p>	<p>Amend GRZ-Px6 with the amendments shown in red:</p> <p><u>Provide for higher-density housing within Residential Intensification Precincts, including:</u></p> <p><u>1. within Residential Intensification Precinct A, residential buildings up to 6-storeys;</u> <u>and</u> <u>2. within Residential Intensification Precinct B, residential buildings up to 4-storeys.</u></p> <p><u>where development meets the requirements of the Residential Design Guide in Appendix x1.</u></p>
	GRZ-P1	Support	Metlifecare supports deleting existing policy GRZ-P1 on the basis it is inconsistent with the Amendment Act.	Delete GRZ-P1.
	GRZ-P9 – Residential activities (excluding visitor accommodation other than temporary residential rental accommodation)	Oppose in part	<p>Seeking to limit the number of residential units per allotment is not consistent with the purpose or provisions of the Amendment Act.</p> <p>The functional and operational requirements of different housing typologies enabled by the Amendment Act also need to be recognised. There is opportunity to do that by amending this policy.</p> <p>It is also considered that a 'limited number of accessory buildings' is unduly restrictive when it applies to the broad range of residential activities, including retirement villages which can have a number of accessory and ancillary buildings for the use and enjoyment of residents. It is considered that the policy wording can be enabling and the rules provide appropriate restrictions based on the specific type of use.</p> <p>Metlifecare otherwise supports the amendments proposed to this policy.</p>	<p>Amend GRZ-P9 as shown in red (or words to similar effect):</p> <p><i>Residential activities</i> will be recognised and provided for as the principal use in the <i>Residential Zones</i>, while ensuring that the <i>effects of subdivision</i>, use and <i>development</i> is in accordance with the following principles:</p> <ol style="list-style-type: none"> adverse <i>effects</i> on natural systems will be avoided, remedied or mitigated; new built <i>development</i> will relate to local built identity, character values and the density of the surrounding residential environment <u>be compatible with the planned built character of the Zone</u>; transport choice and efficiency will be maximised; housing types which meet the need of households will be provided for; <u>the functional and operational requirements of different types of housing solutions are recognised; and</u> a limited number of <u>accessory buildings</u> and <i>buildings</i> which are <i>ancillary</i> to <i>residential activities</i> will be provided for.
	GRZ-P10 – Residential amenity	Oppose	<p>As noted above, Strategic Direction UFD-P2 – Housing Choice seeks to encourage high amenity, not achieve high amenity.</p> <p>In addition, the provision as drafted has not been sufficiently updated to recognise the Density Standards in the MDRS. Instead, it imposes additional considerations which are not consistent with the Amendment Act and do not give effect to the NPS UD.</p>	<p>Amend GRZ-P10 as shown in red below (or words to similar effect):</p> <p>Subdivision, use and development in the Residential Zones will be required to achieve a high level of on-site amenity for residents and neighbours in accordance with the following principles:</p> <ol style="list-style-type: none"> building size and footprint will be proportional to the size of the allotment; usable and easily accessible private outdoor living spaces will be provided; buildings and structures will be designed and located to maximise sunlight access, privacy and amenity for the site and adjoining allotments; buildings and structures will be designed and located to minimise visual impact and to ensure they are of a scale which is consistent with the area's urban form compatible with the planned built character of the Zone; appropriate separation distances will be maintained between buildings; yards will be provided to achieve appropriate building setbacks from neighbouring areas, the street and the coast;

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decisions requested / relief sought
				<p>7. hard and impermeable surfaces will be offset by permeable areas on individual allotments;</p> <p>8. unreasonable and excessive noise, odour, smoke, dust, light, glare and vibration will be avoided;</p> <p>9. non-residential buildings will be of a form and scale which is compatible with the surrounding residential environment; and</p> <p>10. service areas for non-residential activities will be screened, and planting and landscaping will be provided.</p>
	GRZ-P12 – Landscaping	Oppose	<p>This policy indicates that landscaping is required for residential development to enhance residential amenity and sets out a set of principles regulating the location and design of landscaping.</p> <p>The detail of the policy is also better provided for in the rules.</p> <p>This policy is inconsistent with the landscaping standard in the Amendment Act.</p>	<p>Delete GRZ-P12 or amend it as shown in red below (or words to similar effect):</p> <p>Landscaping will be required for non-residential activities and intensive residential development in the Residential Zones to <u>maintain and</u> enhance <u>the built environment residential amenity.</u>, while promoting water conservation and biodiversity and allowing for the natural infiltration of surface waters through permeable treatments.</p> <p>Landscaping will be located and designed in accordance with the following principles:</p> <ol style="list-style-type: none"> 1. the visual impact of large buildings will be reduced by appropriate screening and planting; 2. service areas, loading areas and outdoor storage areas will be screened; 3. on-site outdoor living spaces will be defined and enhanced by landscaping; 4. sunlight access and passive surveillance to adjoining areas will not be unreasonably restricted; 5. public infrastructure and services will not be damaged or blocked; 6. planting of locally indigenous vegetation will be encouraged; and 7. permeable surfaces will be provided for the natural infiltration of surface waters.
	GRZ-P16	Oppose	<p>Metlifecare seeks amendments to GRZ-P16 to be consistent with the Amendment Act and give effect to the NPS UD. For example, GRZ-P16 applies a number of principles that will constrain development which is not in keeping with the changes required in the Amendment Act and NPS UD. It is important that this policy recognises and provides for diverse housing needs.</p> <p>In addition, the Plan provides for a definition of retirement village but this is not used in this policy. Supported living accommodation and retirement villages have different functional and operational needs, and it is appropriate that they have different rules applying to them. This policy should be clear that they are different activities, consistent with the changes sought below to provide separate rules for retirement villages.</p>	<p>Amend GRZ-P16 as shown in red below (or words to similar effect):</p> <p>The <i>development of supported living accommodation and retirement villages</i> will be provided for in a range of forms, including units, <i>minor residential units</i>, complexes, <u>and</u> shared accommodation, rest homes and retirement accommodation, where it is located within the <i>Residential Zones</i> and integrated with the surrounding <i>environment</i>. Supported living accommodation includes accommodation specifically designed for older persons.</p> <p>Supported living accommodation will be undertaken in accordance with the following principles:</p> <p>-</p> <ol style="list-style-type: none"> 1. on-site pedestrian movement and use of open space by residents will not be unduly restricted by the slope of the land; 2. design and development to promote interaction with surrounding communities, without compromising privacy and safety; 3. the scale and design of development will reflect the residential nature and character of the location, and ensure access through the subject site by the public and residents, including the provision of public legal roads and pedestrian accessways consistent with residential scale blocks; and 4. where practicable, the development will be located within walking distance of essential facilities such as local shops, health and community services and public transport networks.

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decisions requested / relief sought
	GRZ- R4 - Shared and group accommodation and supported living accommodation	Oppose	<p>The Plan provides that share and group accommodation and supporting living accommodation (which is defined as accommodation where live-in health or pastoral care/support) is a permitted activity provided that there are no more than 6 residents accommodated at any time and no more than one residential unit is provided. It also requires that any building used for these purposes must comply with the standards in GRZ-R6 excluding Rx1, x2 or x3.</p> <p>This restrictive rule is not appropriate to apply to retirement villages which will typically provide for more than 6 residents.</p> <p>Activities which do not comply are discretionary activities under the Plan, under rule GRZ-R19.</p> <p>It is appropriate that retirement village use is separately provided for and enabled.</p>	<p>Provide a new rule for retirement villages as a permitted activity without any standards applying.</p> <p>We also note that the reference in GRZ-R4(3) to “GRZ-R6” needs to be updated to reference “GRZ-RX1”.</p>
	GRZ-Rx1 – New buildings and structures, and any minor works, additions or alternations to any building or structure	<p>Oppose in part</p> <p>Support in part</p>	<p>The construction of retirement village buildings or any additions or alterations in the General Residential zone or in a Residential Intensification Precinct will be a restricted discretionary activity as the relevant standards will be infringed.</p> <p>It is onerous for any additions or alterations to existing retirement villages to be a restricted discretionary activity. There should be a new rule for additions and alterations to retirement villages to be permitted subject to compliance with appropriate standards.</p> <p>Metlifecare supports new retirement villages being considered as restricted discretionary activities, however this activity also needs to be provided as a separate rule because:</p> <p>(a) A number of the standards do not apply to retirement village developments e.g. outlook space per unit.</p> <p>(b) Matters of discretion that are proposed to apply in Rx5 include consideration of the Residential Design Guide and Council’s Land Development Minimum Requirements (design and construction requirements). These documents do not discuss retirement villages, particular design intentions in relation to these villages. or take into account their functional and operational needs. It is therefore difficult to determine how these can be applied or how the criteria could be satisfied. It is not appropriate for retirement village developments to be required to align with design goals that apply to residential development more generally because it fails to recognise the differing functional and operational needs of retirement villages.</p> <p>(c) Residential development (broadly defined) was sought to be enabled under the Amendment Act. However, the approach taken, prevents that from happening in relation to retirement villages.</p>	<p>Amend GRZ-Rx1 to provide that the following are excluded from this rule:</p> <ul style="list-style-type: none"> <u>Buildings and structures for a retirement village.</u> <p>Amend GRZ-Rx1 Standards Landscaped Area to read as follows (or words to similar effect):</p> <p><u>10. A residential unit at ground floor level must have a landscaped area of a A minimum of 20% of a developed site must be landscaped with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.</u></p> <p><u>11. The landscaped area may be located on any part of the development site, and does not need to be associated with each residential unit.</u></p> <p>Provide a new rule for “<u>Any minor works, additions or alternations to any retirement village within the General Residential Zone</u>” as a permitted activity subject to compliance with:</p> <p><u>GRZ-Rx1 Standards 2 (height), 3 (height to boundary), 4 (setbacks), 5 (building coverage), and 10 and 11 (landscaping).</u></p> <p>Provide a new rule for “<u>Any minor works, additions or alternations to any retirement village within the Residential Intensification Precinct</u>” as a permitted activity subject to compliance with:</p> <p><u>GRZ-Rx1 Standards 4 (setbacks), 5 (building coverage), and 10 and 12 (landscaping); and GRZ-Rx2 Standards 2 (Height – 20m for Precinct A and 14m for Precinct B).</u></p> <p>When compliance with these standards is not achieved any minor works, additions or alternations to any retirement village will require resource consent as a restricted discretionary activity. Discretion will be limited to the extent and effect of non-compliance with any of the standards listed above.</p>

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decisions requested / relief sought
			<p>Metlifecare therefore seeks that new rules are added which provide for additions and alternations to existing retirement villages as permitted (subject to standards), and the construction of new retirement villages as a restricted discretionary activity.</p> <p>The standard relating to landscaping is also unclear in terms of its application where there are a number of units, and also it should not only apply where there are ground floor units. The standard should just apply on a site basis, and be clear that the landscaped area does not need to be associated with each unit.</p>	<p>Provide a new rule for “<u>New retirement village buildings within the General Residential Zone</u>” as a restricted discretionary activity.</p> <p>Provide that the matters of discretion are restricted to:</p> <ol style="list-style-type: none"> <u>The extent and effect of non-compliance with any of the following standards as specified in the associated assessment criteria for any infringed standard:</u> <ol style="list-style-type: none"> <u>GRZ-Px1 – PX5</u> <u>GRX-Px2</u> <u>GRZ-P9 (Residential Activities)</u> <u>GRZ-P16 (Supporting Living and Older Persons Accommodation)</u> <u>The matters in GRZ-Rx1.2 (height), 1.3 (HIRB), 1.4 (setbacks), 1.5 (building coverage), and 1.10 and 1.11 (landscaping).</u> <u>The functional and operational needs of retirement villages.</u>
	GRZ-Rx2 - New buildings and structures, and any minor works, additions or alterations to any building or structure within a Residential Intensification Precinct.	<p>Oppose in part</p> <p>Support in part</p>		<p>Provide for “<u>New retirement village buildings within the Residential Intensification Precinct</u>” as a restricted discretionary activity.</p> <p>Provide that the matters of discretion are restricted to:</p> <ol style="list-style-type: none"> <u>The extent and effect of non-compliance with any of the following standards as specified in the associated assessment criteria for any infringed standard:</u> <ol style="list-style-type: none"> <u>GRZ-Px1 – PX5</u> <u>GRX-Px2</u> <u>GRZ-P9 (Residential Activities)</u> <u>GRZ-P16 (Supporting Living and Older Persons Accommodation)</u> <u>The matters in GRZ-Rx1 1.4 (setbacks), 1.5 (building coverage), 1.10 and 1.11 (landscaping), and GRZ-Rx2.2 (height).</u> <u>The functional and operational needs of retirement villages.</u> <p>Retain permitted activity standard Height 2(a) as notified to provide for 20m in height for Residential Intensification Precinct A.</p>
	<p>GRZ-Rx5 - New buildings and structures, and any minor works, additions or alterations to any building or structure, that do not comply with one or more of the standards under rules GRZ-Rx1 or GRZ-Rx2, except for standard GRZ-Rx1.1.</p> <p>GRZ-Rx6 - New buildings and structures, and any minor works, additions or alterations to any building or structure, that do not comply with</p>	Oppose	As above.	<p>Amend GRZ-Rx5 and GRZ-Rx6 to provide that the following are excluded from this rule:</p> <ul style="list-style-type: none"> <u>Buildings and structures for a retirement village.</u>

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decisions requested / relief sought
	one or more of the standards under rules GRZ-Rx1 or GRZ-Rx2, except for standard GRZ-Rx1.1.			
Planning maps	Paraparaumu	Support	Metlifecare supports the application of the General Residential provisions (which include the MDRS) to the site at 1 Henley Way, as they include the minimum requirements in the Amendment Act.	Provided that Metlifecare's relief above is provided, no further relief is sought.
		Support	<p>Part of the site adjacent to 56 Te Roto Drive is located within the General Residential zone and part of the site is located in the General Industrial zone.</p> <p>For the purpose of giving effect to policy 3 of the NPS-UD and creating a contiguous zoning pattern with the adjacent land, Metlifecare supports part of the site being located in the General Residential zone.</p>	<p>Ensure part of the site adjacent to 56 Te Roto Drive remains located within the General Residential zone.</p> 

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decisions requested / relief sought
		Support	Metlifecare supports the application of the Residential Intensification Precinct A provisions to the site at Coastal Villa Spencer Russell Drive, Paraparaumu.	Retain the residential intensification precinct provisions in relation to the Metlifecare Coastal Villa site, subject to the amendments proposed above.
NH-FLOOD-R3, NH-FLOOD-R8 & NH-FLOOD-R11	Flooding Hazards	Support	Metlifecare supports the consideration of flood risks as a permitted, controlled or restricted discretionary activity. This recognises that additional considerations must be taken into account, but does not unnecessarily limit the development potential of sites in the district because of this “qualifying matter”.	Retain NH-Flood-R8 AND R11 as notified.
Residential Design Guide		Oppose	<p>As explained above, the Guide does not discuss retirement villages, particular design intentions in relation to these villages, or take into account their functional and operational needs.</p> <p>It is not appropriate for retirement village developments to be required to align with design goals that apply to residential development more generally as described in the Guide.</p>	<p>Amend the Residential Design Guide to make it clear that it does not apply to retirement village development.</p> <p>Provide for the Residential Design Guide as a guidance tool only that sits outside of the Plans.</p>

From: [Holly-Marie Noone](#)
To: [Mailbox - District Planning](#)
Cc: [Bianca Tree](#)
Subject: Submission on Plan Change 2 [MERWNZ-MERWLIB.FID681766]
Date: Tuesday, 27 September 2022 4:47:47 pm
Attachments: [Kapiti - submission on behalf of Metlifecare 27_09_22\(900615929.1\) \(002\).pdf](#)

Good afternoon

Please find **attached** a submission on Plan Change 2 on behalf of Metlifecare Ltd.

Kind regards

Holly-Marie Noone

Senior Solicitor

T +64 9 353 9807 M +64212011113

holly-marie.noone@minterellison.co.nz

MinterEllisonRuddWatts

minterellison.co.nz | [LinkedIn](#)



Important information

This email and any attachments are confidential and may be legally privileged (in which case neither is waived or lost by mistaken delivery). Please notify us if you have received this message in error, and remove both emails from your system. Any unauthorised use is expressly prohibited. MinterEllisonRuddWatts collects personal information to provide and market our services (see our privacy policy at minterellison.co.nz for more information about use, disclosure and access). MinterEllisonRuddWatts' liability in connection with transmitting, unauthorised access to, or viruses in this message and its attachments, is limited to re-supplying this message and its attachments.

Lawyers are required to seek verification of their client's identity. [Learn more.](#)
