

# Submission on notified proposal for plan change



## About preparing a submission on a proposed plan change

### You must use the prescribed form

- [Clause 6](#), Schedule 1 of the Resource Management Act 1991 (RMA) requires submissions to be on the prescribed form.
- The prescribed form is set out in [Form 5](#), Schedule 1 of the Resource Management (Forms, Fees, and Procedure) Regulations 2003.
- This template is based on Form 5. While you do not have to use this template, your submission must be in accordance with Form 5.

### Your submission and contact details will be made publicly available

- In accordance with [clause 7](#) of Schedule 1 of the RMA, the Council will make a summary of your submission publicly available. The contact details you provide will also be made publicly available, because under [clause 8A](#) of Schedule 1 of the RMA any further submission supporting or opposing your submission must be forwarded to you by the submitter (as well as being sent to Council).
- [Section 352](#) of the RMA allows you to choose your email to be your address for service. If you select this option, you can also request your postal address be withheld from being publicly available. To choose this option please tick the relevant boxes below.

### Reasons why a submission may be struck out

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious
- it discloses no reasonable or relevant case
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- it contains offensive language
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

## To Kāpiti Coast District Council

Submission on Proposed Plan Change 2 to the Operative Kapiti Coast District Plan 2021

### Submitter details

**Full name of submitter:** Luke Hinchey on behalf of the Retirement Villages Association of New Zealand

**Contact person (name and designation, if applicable):**

**Postal address (or alternative method of service under section 352 of the RMA):**  
c/o Chapman Tripp, Level 34 PwC Tower, Auckland CBD, PO Box 2206

**Telephone:** +64 9 357 2709

**Electronic address for service of submitter (i.e. email):** luke.hinchey@chapmantripp.com

**I would like my address for service to be my email** *[select box if applicable]*

☐

**I have selected email as my address for service, and I would also like my postal address withheld from being publicly available** *[select box if applicable]*

☐

**Scope of submission**

**The specific provisions of the proposed plan change that my submission relates to are:**  
*[give details]*

See attached submission.

*Continue on a separate sheet if necessary*

## **Submission**

**My submission is:** *[include whether you support or oppose the specific provisions or wish to have them amended; and reasons for your views]*

See attached submission.

*Continue on a separate sheet if necessary*

**I seek the following decision from the Kāpiti Coast District Council:** *[give precise details]*

See attached submission.

*Continue on a separate sheet if necessary*

**Hearing Submissions [select appropriate box]**

I wish to be heard in support of my submission.	<input type="checkbox"/>
I do not wish to be heard in support of my submission.	<input type="checkbox"/>
If others make a similar submission, I will consider presenting a joint case with them at a hearing.	<input checked="" type="checkbox"/>
If others make a similar submission, I will not consider presenting a joint case with them at a hearing.	<input type="checkbox"/>

27/9/22

\_\_\_\_\_  
Signature of Submitter  
(or person authorised to sign on behalf of submitter)

\_\_\_\_\_  
Date

*A signature is not required if you make your submission by electronic means.*

**Trade Competition [select the appropriate wording]**

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by [clause 6\(4\)](#) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could ☐ / I could not ☒ gain an advantage in trade competition through this submission.

***If you could gain an advantage in trade competition through this submission, please complete the following:***

I am ☐ / I am not ☐ directly affected by an effect of the subject matter of the submission that—

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

Email your submission to [district.planning@kapiticoast.govt.nz](mailto:district.planning@kapiticoast.govt.nz) or post/deliver to:

Attn: District Planning Team  
Kāpiti Coast District Council  
175 Rimu Road  
Paraparaumu 5032

For office use only

Submission No:

197





**Form 5**

**SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR  
PLAN, CHANGE OR VARIATION**

*Clause 6 of Schedule 1, Resource Management Act 1991*

**To** Kāpiti Coast District Council (*Council*)

Name of submitter: Retirement Villages Association of New Zealand Incorporated (RVA)

- 1 This is a submission on the Council's proposed amendments to the Kāpiti Coast District Plan (*District Plan*): Proposed Plan Change 2: Intensification (PC2).
- 2 The RVA could not gain an advantage in trade competition through this submission.

**INTRODUCTION**

- 3 The RVA welcomes this opportunity to provide feedback on PC2. The RVA and its members have a significant interest in how PC2 provides for retirement villages in the Kāpiti District (*District*).
- 4 New Zealand, including the Kāpiti District, has a rapidly increasing ageing population and longer life expectancy and there is a growing trend of people wishing to live in retirement villages.
- 5 The under-provision of retirement living and aged care in New Zealand is at crisis point, with the growing ageing population facing a significant shortage in appropriate accommodation and care options. This problem is immediate, and demographic changes mean that the demand for retirement accommodation and aged care will continue to grow.
- 6 The Government recently recognised the ageing population as one of the key housing and urban development challenges facing New Zealand in its overarching direction for housing and urban development – the Government Policy on Housing and Urban Development (*GPS-HUD*).<sup>1</sup> The GPS-HUD records that "[s]ecure, functional housing choices for older people will be increasingly fundamental to wellbeing".<sup>2</sup> The government strategy *Better later life – He Oranga Kaumatua 2019 to 2034* recognises that "[m]any people want to age in the communities they already live in, while others wish to move closer to family and whānau, or to move to retirement villages or locations that offer the lifestyle and security they want".<sup>3</sup>
- 7 The RVA considers PC2 needs to adequately address the critical need for retirement accommodation and aged care in the District. It must also provide a clear and

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<sup>1</sup> The GPS-HUD was issued in September 2021 (available [online](#)).

<sup>2</sup> GPS-HUD, page 10.

<sup>3</sup> *Better Later Life – He Oranga Kaumatua 2019 to 2034* (available [online](#)), page 32.

consistent regime for retirement villages. It is also important that potential effects from retirement villages are managed proportionately and efficiently with the least regulation and prescription necessary. The significant benefits of retirement villages also need to be given appropriate weight.

- 8 The RVA is also seeking national consistency in the planning regimes for retirement villages through the intensification planning instruments required under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (*Enabling Housing Act*). National consistency will greatly assist with streamlining and making more efficient, the delivery of retirement villages across New Zealand.

- 9 This submission is set out as follows:

- 9.1 **Background:** This section introduces the RVA, retirement villages and the regulatory regime applying to retirement villages. It then sets out New Zealand's ageing population demographics and outlines the retirement housing and care crisis and the wellbeing and health issues arising from that crisis. Finally, it sets out the role of retirement villages in addressing that crisis and the other benefits of retirement villages.

- 9.2 **What PC2 must deliver for retirement villages:** This section sets out the outcomes the RVA considers PC2 must deliver for retirement villages. The key outcomes sought by the RVA are: the appropriate translation of the Medium Density Residential Standards (*MDRS*) from the Enabling Housing Act into the District Plan, amendments to the District Plan to address inconsistencies with the MDRS and a retirement village-specific planning framework that adopts the key features of the MDRS as appropriately modified.

- 9.3 **Relief sought:** This section sets out the relief sought by the RVA to address the key outcomes it seeks in relation to PC2. The RVA's specific submission points and relief sought on PC2 are set out in **Appendix 1**.

## **BACKGROUND**

### **RVA**

- 10 The RVA is a voluntary industry organisation that represents the interests of the owners, developers and managers of registered retirement villages throughout New Zealand. The RVA was incorporated in 1989 to represent the interests of retirement village owners, developers and managers, to government, develop operating standards for the day-to-day management of retirement villages, and protect their residents' wellbeing.
- 11 Today, the RVA has 407 member villages throughout New Zealand, with approximately 38,520 units that are home to around 50,000 older New Zealanders. This figure is 96% of the registered retirement village units in New Zealand.<sup>4</sup> The RVA's members include all five publicly-listed companies (Ryman Healthcare, Summerset Group, Arvida Group, Oceania Healthcare, and Radius Residential Care Ltd), other corporate groups (such as Metlifecare and Bupa Healthcare) independent

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<sup>4</sup> There are also almost 6,000 Occupation Right Agreements for care suites as part of the aged care system.

operators, and not-for profit operators (such as community trusts, and religious and welfare organisations).

### **Retirement villages**

- 12 'Retirement village' is an umbrella term given to all types of retirement living. There are two main types of retirement villages - 'comprehensive care villages' and 'lifestyle villages':

12.1 Comprehensive care retirement villages provide a full range of living and care options to residents from independent living, through to serviced care, rest home, hospital and dementia level care.

12.2 Lifestyle retirement villages focus mostly on independent living units with a small amount of serviced care provided on a largely temporary basis.

- 13 Approximately 65% of registered retirement villages have some level of aged residential care within the village. Approximately 19,300 aged care beds are part of a retirement village, which is 50% of all age care beds in the country.<sup>5</sup>

- 14 'Retirement village' is defined in section 6 of the Retirement Villages Act 2003 (*RV Act*) as:

... the part of any property, building, or other premises that contains 2 or more residential units that provide, or are intended to provide, residential accommodation together with services or facilities, or both, predominantly for persons in their retirement, or persons in their retirement and their spouses or partners, or both, and for which the residents pay, or agree to pay, a capital sum as consideration and regardless of [various factors relating to the type of right of occupation, consideration, etc]...

### **A regulated industry**

- 15 The retirement village industry is regulated by the Retirement Villages Act 2003 (*RV Act*), as well as associated regulations and codes of practice established through the RV Act. The regulatory regime is focussed on consumer protection via a comprehensive disclosure regime, so that residents make an informed decision to move to a village.

- 16 This regulatory regime includes the following:

16.1 Registration of retirement villages with the "Registrar of Retirement Villages". The Registrar places a memorial on the land title. The memorial means that the village can only be sold as a retirement village and that the residents' tenure is ranked above all other creditors to the village. The residents have absolute rights to live in their units and have access to the village amenities.

16.2 Retirement village operators are required to appoint a "Statutory Supervisor" whose job is to protect residents' interests and report to the Registrar and the Financial Markets Authority that the village is being operated in a financially prudent manner.

16.3 Operators are required to provide intending residents with a disclosure statement that sets out the village's ownership, financial position, status, and a range of other important information. This statement provides

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<sup>5</sup> Jones Lang LaSalle, NZ Retirement Villages and Aged Care Whitepaper, July 2022, page 4.



comprehensive guidance to ensure that a resident's decision to move into a retirement village is an informed one.

- 16.4 Before signing a contract (an "Occupation Right Agreement" or "ORA"), an intending resident must consult a solicitor who must explain the details of the contract and sign an affirmation that they have provided that advice.
- 17 The codes of practice that regulate the industry include a code of practice and a code of residents' rights.<sup>6</sup> The Code of Practice is administered by the Ministry of Business, Innovation and Employment, and it governs the day-to-day management of the villages. The Code sets out the minimum standards for the operation of retirement villages. These standards address a wide variety of matters, including documents that operators must provide to intending residents, staffing policies and procedures, safety and security policies, fire and emergency procedures, the frequency and conduct of meetings between residents and operators, complaint procedures, as well as communications with residents.
- 18 The Code of Residents' Rights is set out in the RV Act.<sup>7</sup> The Code is a summary of the minimum rights conferred on retirement village residents. It ensures that residents are respected and consulted on material matters that affect their contracts.<sup>8</sup>

### **New Zealand's ageing population**

- 19 The proportion of older people in our communities compared to the rest of the population is increasing. Soon, there will be more people aged 65+ than children aged under 14 years.<sup>9</sup> By 2034, it is expected that New Zealand will be home to around 1.2 million people aged 65 and over, just over a fifth of the total population.<sup>10</sup>
- 20 The growth in the 75+ age bracket is also increasing exponentially (as illustrated by the graph below). It is estimated that 364,100 people in New Zealand were aged over 75 in 2022. By 2048, the population aged 75+ is forecasted to more than double to 804,600 people nationally.<sup>11</sup>
- 21 In Kāpiti, the growth in the 75+ age bracket is even greater than the national average. Statistics New Zealand estimates that in 2018, 6,930 people were aged over 75. By 2048, this number is forecasted to more than double to 14,000.<sup>12</sup>

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<sup>6</sup> Both codes are available online ([Code of Practice](#) and [Code of Residents Rights](#)).

<sup>7</sup> Schedule 4.

<sup>8</sup> The Code sets out a residents' rights to services, information, and consultation, the right to complain, the right to a speedy and efficient process for resolving disputes, the right to use a support person or representative in dealings with the operator or other residents at the village, the right to be treated with courtesy, and the right not to be exploited by the operator.

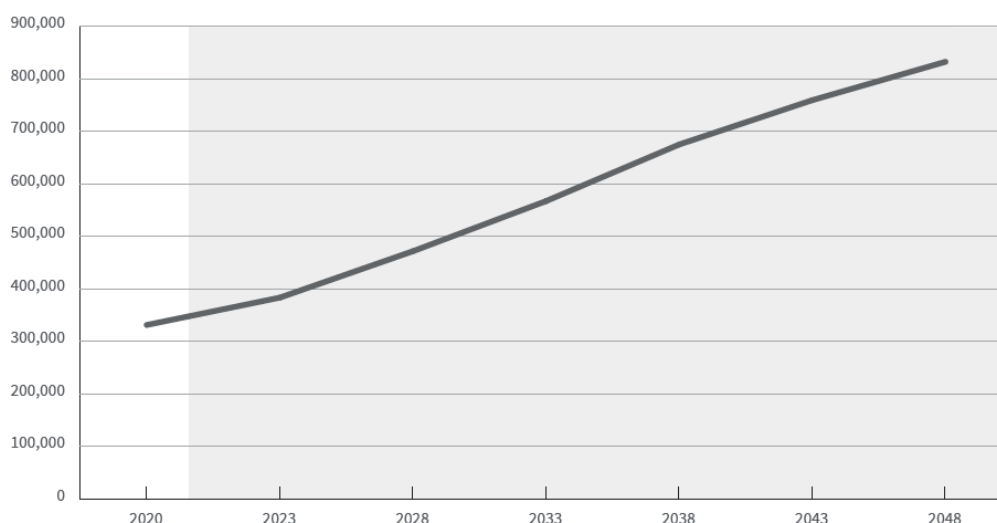
<sup>9</sup> Better Later Life – He Oranga Kaumatua 2019 to 2034, page 6.

<sup>10</sup> Ibid.

<sup>11</sup> Statistics New Zealand, Population Projections.

<sup>12</sup> Statistics New Zealand, Subnational Population Estimates at 30 June 2021 (provisional).

**Figure 1** 75+ years population 2020 - 2048



Source: JLL Research and Consultancy; Statistics New Zealand (medium forecast scenario)

- 22 Older people aged 85+ comprise the most rapidly increasing age group in the country, with the numbers projected to almost triple from 93,500 in 2022 to 227,600 in 2048. Given around 45% of this age group require aged care beds, this growth will create a need for a minimum of an additional 84,700 aged care beds to be provided by 2048.
- 23 The ageing population of New Zealand reflects the combined impact of:
  - 23.1 Lower fertility;
  - 23.2 Increasing longevity (due to advances in medical technology and increased survival rates from life-threatening diseases); and
  - 23.3 The movement of the large number of people born during the 1950s to early 1970s into the older age groups.
- 24 The largest increases in the 65+ age group will occur in the 2020s and 2030s, when the large birth cohorts of the 1950s and 1960s (the "baby boomers") move into this age group.

### **The retirement housing and care crisis**

- 25 The under-provision of retirement living and aged care in New Zealand is at crisis point, with the growing ageing population facing a significant shortage in appropriate accommodation and care options. This problem is immediate, and projected to worsen in the coming decades as older age groups continue to grow.<sup>13</sup>
- 26 The demand for quality living options is significantly higher than the current supply. The supply is decreasing due to closures of older style small and poor quality aged care homes, which are usually conversions of old houses. These usually do not offer

<sup>13</sup> See, for example, Stats NZ (2020). Housing in Aotearoa: 2020, which outlines the need for changing size and suitability of housing, acknowledging the ageing population. For further detail on the question of 'what is the ideal place to grow older', see Janine Wiles, Kirsty Wild, Ngaire Kerse, Mere Kēpa, Carmel Peteru (2011). Resilient Ageing in Place Project Recommendations and Report. The University of Auckland, Auckland.

the living standard that residents deserve. At the same time, demand for retirement housing and care is increasing.

- 27 This crisis is evidenced by the increasing number of RVA members' villages that have waiting lists (including existing villages and those under construction). Many RVA member villages have waiting lists of 2 or more years. These lists are comprised of people who have expressed an interest in living in a retirement village. The waitlists show the desperate need in New Zealand for more retirement living and care options.
- 28 The ageing population and longer life expectancy, coupled with a trend towards people wishing to live in retirement villages that provide purpose-built accommodation, means that demand is continuing to grow. This is creating a severe and growing shortage of retirement villages, as supply cannot match demand. The national penetration rate for retirement villages (i.e. the percentage of the population aged 75+ who choose to live in a village) is 14.3%. If the existing penetration rate continues, we can expect an increase of approximately 34,000 residents, and a national demand for an additional 26,000 retirement village units by 2033.<sup>14</sup> In reality, the demand will be higher as the penetration rate continues to grow.
- 29 This increasing demand is reflected in the development pipeline.<sup>15</sup> In 2022, there was a total of 216 villages in the development pipeline.<sup>16</sup> This development pipeline, if realised, will help ease the short-term anticipated shortfall in supply of quality retirement living and aged care options in New Zealand. However, further development of new villages, beyond the current pipeline, is needed to meet the longer-term predicted shortfall. It is anticipated that at least 10 new large scale villages each year are going to be required across New Zealand, just to keep up with demand over the next 20 years.
- 30 Further, the COVID-19 pandemic has exacerbated this issue. Overall, retirement villages performed remarkably well in protecting the most vulnerable by providing safe communities and companionship during the tough periods of lockdown. This performance has resulted in an even stronger demand to access retirement villages and further limited stock available.<sup>17</sup>
- 31 As discussed in more detail in subsequent sections of this paper, a key barrier to meeting the increasing demand is the significant delay between the consenting and construction stages of developments. Even if the resource consent process goes smoothly, the development of a retirement village is around a 10 year project for most new villages. But, many retirement villages face years of delays during the consenting process. Delays are frustrating and costly for all involved, and are especially prejudicial to the wellbeing of older persons who are living in unsuitable accommodation while waiting for a retirement village to be completed.

#### **Social issues arising from the shortage of housing and care for older people**

- 32 Providing appropriate accommodation and care for older persons is a critical social issue facing New Zealand. A failure to recognise and provide for appropriate housing and care for the ageing population in future planning will impact on the

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<sup>14</sup> Jones Lang LaSalle, NZ Retirement Villages and Aged Care Whitepaper, July 2022, page 18.

<sup>15</sup> The 'development pipeline' refers to the development of new villages (both actual and planned).

<sup>16</sup> Jones Lang LaSalle, NZ Retirement Villages and Aged Care Whitepaper, June 2021, page 17.

<sup>17</sup> Ibid, pages 5 and 25.

mental and physical health and wellbeing of some of society's most vulnerable members, and have flow on effects that will impact the wider community as a whole.

### ***Suitability of accommodation***

- 33 Many of New Zealand's older residents are currently living in unsuitable accommodation. "Unsuitable accommodation" in this context can mean a couple or a single person living in a large house that is expensive and difficult to maintain and heat properly, has barriers to mobility such as stairs, or is built on a hill, or has a garden that they cannot maintain. Unsuitable accommodation could also include housing that is of such a distance from key services and amenities that it limits their access to their community and care needs.
- 34 In this context, it is important to note that retirement villages have a very different new-build pattern than the rest of the country's new-build housing stock.<sup>18</sup> New Zealand's general housing stock is dominated by three or more bedroom dwellings, with the average size of new builds increasing from around 115 m<sup>2</sup> in 1976 (33 m<sup>2</sup> per person) to 200 m<sup>2</sup> in 2013 (71 m<sup>2</sup> per person).
- 35 In contrast, the retirement village industry is building units that match the needs of smaller households, with approximately 90% of retirement village units providing one or two bedrooms.<sup>19</sup>
- 36 Retirement units are also purpose-built for older people. They are accessible for those with mobility restrictions, are modern, warm and comfortable, and responsibility for their upkeep and maintenance falls on the village operator rather than the resident.
- 37 Further, retirement villages generally offer extensive on-site amenities, such as pools, gyms, theatres, libraries, bars and restaurants, communal sitting areas, activity rooms, bowling greens, and landscaped grounds. These amenities are provided to meet the specific needs of retirement village residents, leading to significant positive benefits for residents.

### ***Mental wellbeing***

- 38 Mental wellbeing issues are also growing, including isolation, loneliness, and related depression due to many older people living alone, and often also being separated from family and friends due to their increasing mobility restrictions.
- 39 This presents a serious social issue for New Zealand. There is little doubt that older people are particularly vulnerable to social isolation or loneliness because friends and family have either died or moved away, or they have restricted mobility or income. This isolation impacts on the individual's quality of life and wellbeing, adversely affecting their health and increasing their use of health and social care services. In exploring the prevalence of this issue, one study estimates that between 5 and 16% of people aged 65+ report loneliness, while 12% feel socially isolated.<sup>20</sup>

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<sup>18</sup> CRESA, Retirement Village Housing Resilience Survey (June 2014), and Equity Release – Realities for Older People (August 2016).

<sup>19</sup> CRESA, Equity Release – Realities for Older People, August 2016.

<sup>20</sup> Social Care Institute for Excellence, Research Briefing number 39, Preventing loneliness and social isolation: Intervention and Outcomes, October 2011.

- 40 Based on recent data collected by UMR Research New Zealand,<sup>21</sup> the most important factors for people when deciding to move into a retirement village are 'security and safety', 'peace of mind' and 'hassle-free lifestyle'. Importantly, the data also shows that retirement villages deliver on these important factors. The changing structure of society, resulting in families living far apart and older people living on their own, has resulted in many older people feeling isolated and lonely. Villages provide safe, warm, appropriate housing and a community of interest for their residents with the opportunity for socialisation should they choose to take it up. Villages therefore directly combat isolation and loneliness felt by so many older people.
- 41 Longitudinal studies into recorded lifespans show that older people who are part of a social group have a better chance of living longer than those who are not. Australian studies suggest that retirement village residents live longer and happier lives than the same cohort who live elsewhere.<sup>22</sup>
- 42 Retirement villages are an important way to fight social isolation and loneliness. Facilitating the development of appropriate accommodation and care for the ageing population and enabling older people to move into purpose built, comfortable and secure dwellings not only improves the quality of life of these older people, but also has wider benefits for the community as a whole. The improved social and health support provided in retirement villages alleviates pressure placed on health and social care services freeing up these resources for other community members. The movement of older people into retirement villages also releases existing housing stock for other people, as addressed in more detail below.

### **The role of retirement villages**

#### ***Addressing the retirement housing and care crisis***

- 43 Retirement villages already play a significant part in housing and caring for older people in New Zealand. As previously noted, currently 14.3% of the 75+ age group population live in retirement villages, a penetration rate that has risen from around 9.0% of the 75+ age population at the end of 2012.<sup>23</sup> It is likely that this rate will continue to increase over time.
- 44 In Kāpiti, retirement villages play an even more significant role than elsewhere in New Zealand, with 23.1% of the 75+ age group population living in a retirement village.
- 45 As previously mentioned, RVA's members have 407 villages across the country, providing homes for around 50,000 residents. Over the next 5 to 10 years, that is anticipated to grow significantly with 86 new villages and 130 expansions to existing villages, providing 22,200 homes for approximately additional 28,900 residents. Retirement villages therefore will play a growing role in addressing the retirement housing and care crisis.
- 46 In Kāpiti, there are currently 9 existing villages that are home to around 1,588 residents. Two villages are also in development that will provide homes for around

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<sup>21</sup> UMR Research New Zealand, 'Residents Survey – Retirement Villages Association', January 2021. The results were based on questions asked in an online survey distributed to 100 retirement villages across New Zealand.

<sup>22</sup> For example, studies undertaken by the Illawarra Retirement Trust, a retirement village operator based in Wollongong, NSW.

<sup>23</sup> Ibid, page 15.

390 residents. A number of additional villages will therefore be needed in the District to meet the growth in the 75+ demographic.

- 47 The RVA's members have established reputations for building high quality villages to address the needs of residents and employing professional and caring staff. Through this experience, retirement village operators have developed in depth and specialist knowledge and expertise in the development of purpose built retirement villages. Importantly, retirement village operators are not developers, and have a long term interest in their villages and residents.
- 48 Retirement villages also cater to a wide range of residents with differing levels of health and independence, offering a range of housing options and care to meet the specific needs of the residents. These are features that often distinguish retirement village operators from typical residential developers who generally do not deliver purpose built environments for the ageing population.
- 49 Retirement village operators are therefore well placed to help to address the retirement housing and care crisis. To do so, it is critical that the construction, operation and maintenance of retirement villages are appropriately provided for in planning regimes.

***Providing a range of accommodation options to suit different needs***

- 50 Retirement villages provide appropriate accommodation and care for a vulnerable sector of our community with different housing and care needs compared to the rest of the population.
- 51 Retirement villages allow older people to continue living in their established community, while down-sizing to a more manageable property (i.e. without stairs or large gardens). Retirement village living provides security, companionship and peace of mind for residents.<sup>24</sup> Residents will also, in most cases, have easy access to care and other support services.
- 52 The RVA has seen a marked change in retirement accommodation over the last 20 years. In the past, lifestyle villages without care were relatively common. As the population ages, the retirement village industry is seeing a greater demand for a 'continuum of care' in one location - from independent units through to hospital and dementia care. Today, many villages are being developed with some degree of residential care in their campus. Some villages are committed to a full continuum of care, while others focus on providing a smaller number of rest home beds that are available for residents if they are needed.
- 53 Another important trend is for operators to build serviced apartments, where a resident moves in and out of care as required but without having to physically move from their apartment. These developments are a direct response to market demands. The sector is focused on providing a mix of independent living units and care options to meet the range of financial, social and other resources our residents have.

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<sup>24</sup> PWC 'Retirement village contribution to housing, employment, and GDP in New Zealand' (March 2018). Brown, N.J., "Does Living Environment Affect Older Adults Physical Activity Levels?". Grant, Bevan C. (2007) 'Retirement Villages', *Activities, Adaptation and Aging*, 31:2, 37-55.

- 54 A number of operators also focus on providing social housing as part of their villages. This can be a mix of affordable Occupation Right Agreements and rental units.
- 55 'Care only' facilities are increasingly rare. This is because under the current government funding regime for health care provision, it is not possible to justify the capital cost of building stand-alone residential care facilities. As a result, no residential care facilities, apart from extensions to existing facilities, have been built in the last five years or so.
- 56 Ultimately, the retirement village industry provides appropriate accommodation to address the specific needs of the older population, including a range of large and smaller scaled retirement villages and aged care homes with differing services, amenities and care. This variety enables differing price points and options, which are vital to enabling choices for the growing ageing population.

***Retirement villages' role in addressing the general housing crisis***

- 57 Retirement villages also help to ease demand on the residential housing market and assist with the housing supply shortage in New Zealand. That is because growth in retirement village units is faster than growth in the general housing stock. And, the majority of new villages are located in major urban centres. The retirement village sector therefore also contributes significantly to the development of New Zealand's urban areas, and the particular challenges urban areas face.
- 58 New build data from Statistics NZ shows that retirement village units constituted between 5% and 8% of all new dwellings between June 2016 and June 2021.
- 59 The retirement village sector allows older New Zealanders to free up their often large and age-inappropriate family homes and move to comfortable and secure homes in a retirement village. The RVA estimates that around 5,500 family homes are released back into the housing market annually through new retirement village builds. This represents a significant contribution to easing the chronic housing shortage. A large scale village, for example, releases approximately 300 houses back onto the market to be more efficiently used by families desperate for homes. To illustrate, retirement units are generally occupied by an average of 1.3 people per unit, compared to an average of 2.6 people per standard dwelling.

***Other benefits of retirement villages***

- 60 In addition to the important role of retirement villages in addressing the housing crisis and providing the ageing population with housing and care tailored to their needs, the retirement village sector also produces other broader benefits:
- 60.1 The sector employs approximately 19,000 people to support day-to-day operations. Between 2018 and 2026, approximately 9,500 new jobs will have been created from construction of new villages. The sector contributes around \$1.1 billion to New Zealand's GDP from day-to-day operations.<sup>25</sup> More recently, and importantly, the sector has generated jobs in industries that have been impacted by COVID-19 (such as hospitality and accommodation).
- 60.2 The contribution of retirement village construction is also substantial. For example, a large scale new village will cost in the order of \$100-\$200 million

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<sup>25</sup> PWC 'Retirement village contribution to housing, employment, and GDP in New Zealand' (March 2018) page 4.

to construct. Retirement village construction is also expected to employ approximately 5,700 FTEs each year.<sup>26</sup>

- 60.3 Retirement villages also support Te Whatu Ora, Health New Zealand by providing health care support for residents that would otherwise be utilising the public healthcare system thereby reducing “bed blocking” in hospitals.
- 60.4 Due to the lower demand for transport (including because of on-site amenities), retirement villages contribute proportionately less to transport emissions than standard residential developments. Operators also invest in a range of other methods to reduce carbon emissions from the construction and operation of villages.

## **WHAT PC2 MUST DELIVER FOR RETIREMENT VILLAGES**

### **Better enable housing and care for the ageing population**

- 61 As explained above, promoting the wellbeing of older persons within our communities requires district plans to better enable the construction of new retirement villages. In the experience of RVA members, cumbersome, rigid and uncertain resource management processes and practices are a major impediment to delivering necessary retirement housing and care. In particular, resource consent processes take too long, are unnecessarily complex, and often do not provide for retirement living options properly because the relevant plans are not fit for purpose.
- 62 PC2 represents a major opportunity to better enable the provision of a diverse range of retirement housing and care options. If this opportunity is not taken now, the existing consenting challenges facing retirement village operators are likely to be perpetuated for many years.
- 63 In fact, Council must take this step in order to give effect to the NPSUD through PC2. The NPSUD specifically recognises that well-functioning urban environments enable all people and communities to provide for their wellbeing, health and safety (Objective 1). For the reasons explained in detail above, achieving this wellbeing objective in relation to older persons within our community means providing for their specific housing and care needs.
- 64 The NPSUD also states that contributing to well-functioning urban environments means enabling a “*variety of homes*” to meet the “*needs ... of different households*” (Policy 1), and that cannot be achieved in our major centres without enabling significant intensification of our urban environments (Policy 3). These NPSUD policies therefore require Variation 1 to specifically respond to the need to provide suitable and diverse housing choices and options for our ageing population as part of the intensification of urban environments.
- 65 The Enabling Housing Act builds on the NPSUD as part of the Government’s response to reduce barriers to housing supply. The Enabling Housing Act puts in place specific requirements to provide for medium density housing as a minimum in all relevant residential zones (MDRS). Retirement villages will not be permitted activities under the MDRS because of the “*no more than 3 residential units per site*” density standard (clause 10). However, retirement villages require “*the construction and use of 4 or more residential units on a site*”. They will therefore be restricted discretionary activities under the MDRS. Accordingly, the RVA considers PC2 must

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<sup>26</sup> Ibid.



include a restricted discretionary activity rule for retirement villages in all relevant residential zones.

- 66 It is also important to emphasise that the Enabling Housing Act does not only require Tier 1 councils to implement the medium density requirements in relevant residential zones but also to give effect to Policy 3 of the NPSUD regarding intensification of urban environments.<sup>27</sup> Accordingly, PC2 also needs to enable intensification (through building heights and densities) that responds to the location of centres and rapid transit stops. In some cases, that intensification must include "building heights of at least 6 storeys" and must achieve the objective of enabling more people to live in areas where there is a high demand for housing (Objective 3 of the NPSUD).
- 67 In order to meet the Enabling Housing Act requirements, to give effect to the NPSUD, and respond to the significant health and wellbeing issues created by the current retirement housing and care crisis, PC2 must ensure that the Kāpiti Coast District Plan specifically and appropriately provides for and enables retirement villages in all relevant residential and commercial/mixed use zones.
- 68 The RVA considers this outcome can only be achieved by providing for a retirement village-specific objective, policy and rule framework. In the experience of RVA members, without a specific framework, retirement village proposals face material uncertainty and consenting barriers as council officers attempt to apply general residential approaches that are not fit-for-purpose to retirement villages. The retirement village-specific framework sought by the RVA is set out in the following sections of this submission.

**Recognise that retirement villages are a residential activity**

- 69 A key issue with many existing district plans is their failure to explicitly recognise that retirement villages are a residential activity. This issue has resulted in consenting challenges with members of the community, and sometimes even council officers, taking the view that retirement villages are non-residential activities that should only be provided for in non-residential zones or seeking to assess different parts of a village in a different manner (such as a commercial activity).
- 70 Retirement villages are clearly a residential activity<sup>28</sup> as they provide permanent homes for the residents that live there. Retirement villages do provide a range of ancillary services, however those services are provided for residents only and complement the residential function of retirement villages by meeting the particular needs of older residents. The residential nature of retirement villages is reflected in the definition, which recognises the key function of villages as a "*residential complex or facilities*" for the provision of "*residential accommodation for people who are retired*".<sup>29</sup>
- 71 This recognition requires that retirement villages as a land use are a permitted activity. In line with the Enabling Housing Act, the RVA considers the construction of retirement villages (being four or more residential units on a site) can be regulated as a restricted discretionary activity.

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<sup>27</sup> RMA, s77G.

<sup>28</sup> The definition of 'residential activity' as set out in the National Planning Standards is: "*means the use of land and building(s) for people's living accommodation*".

<sup>29</sup> National Planning Standard, page 62.

### **Provide for retirement villages in the MRZ**

- 72 The RVA members' experience is that older people want to stay in the communities in which they currently live, and have lived for many years, during their retirement. This is called 'ageing in place'. It allows residents to remain close to their families, friends, familiar amenities and other support networks. It promotes activities that improve residents' wellbeing, including physical activity, social engagement and intergenerational activity, due to the easily accessible surrounding destinations in a familiar neighbourhood. It allows residents to access public transport to facilitate these activities as independent driving ability declines and climate change impact increases. It allows residents to continue to play an integral part in the communities that they helped establish.
- 73 For these reasons, the majority of retirement village residents come from dwellings located in surrounding suburbs.
- 74 It is noted that the Christchurch Replacement District Plan Independent Hearings Panel (chaired by a former High Court judge, with members including another former High Court judge, an Environment Court judge and experienced independent commissioners) acknowledged the importance of ageing in place:<sup>30</sup>

[332] Dr Humphrey's evidence stressed the clear health and social evidence of people ageing in their own communities. We have also taken particular note of Dr Humphrey's evidence as to the importance of providing choice for ageing in place. That evidence was supported by the evidence of Mr de Roo. We find that ageing in place, whereby older persons have choices to downsize from their family homes yet remain within their familiar neighbourhoods, is important not only for the wellbeing of our older citizens but also for the communities of which they should continue to contribute to and be part of. In addition to providing choice, assisting affordability is also important. Those priorities are also generally reflected in the Statement of Expectations.

- 75 Similar issues were recognised in the Proposed Auckland Unitary Plan section 32 evaluation:<sup>31</sup>

Existing legacy plans do not provide the flexibility required by retirement villages to construct buildings that are 'fit for purpose' in terms of providing for a range of housing and care choices for older people and those requiring care or assisted living. As Auckland's population continues to grow, it is important that a choice of housing is provided for older people, particularly in locations that provide good amenity and access to community services and facilities.

- 76 Both the Auckland Unitary Plan and Christchurch District Plan provide for the construction of retirement villages as a restricted discretionary activity in the key residential zones.
- 77 The RVA members' experience is that sites in existing residential areas that are appropriate for retirement villages are extremely rare. Sites of the required size and in good locations are highly unique and valuable resources in our larger cities. They need to be efficiently used.

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<sup>30</sup> Decision 10 – Residential (part) (and relevant definitions and associated planning maps) (10 December 2015).

<sup>31</sup> Auckland Unitary Plan Section 32 Report, Part 2.50.

- 78 The need to provide for older persons to 'age in place', the inappropriateness of traditional intensification models, and lack of appropriate sites for retirement villages, means that achieving the objective of providing appropriate housing and care for older persons requires a planning framework that enables retirement villages in the MRZ.

**Provide for change to existing urban environments**

- 79 There are key differences between retirement villages and 'typical' residential dwellings. These differences mean that retirement villages do change the existing urban environments that are dominated by 'typical' dwellings, and this has not been acknowledged properly in planning frameworks leading to a range of consenting challenges.
- 80 Because of their functional and operational needs, retirement village and aged care facilities tend to be larger (in height and bulk) than 'typical' residential housing in order to properly cater for resident needs.
- 81 To illustrate, retirement villages contain a range of unit types to cater for the different care and mobility needs of the residents. The accommodation ranges from independent townhouses and apartments, through to serviced apartments, hospital beds and dementia rooms. While independent living villas, townhouses and apartments will include full kitchens, bathrooms, lounges and other household amenities, serviced apartments and care rooms will not always have these amenities. These factors may be a key driver for the layout and amenities within a unit and also within a village. For example, serviced apartments and care rooms need to have quick, accessible, and all weather access to communal living and dining areas. In the experience of RVA members', council officers often attempt to redesign village layouts based on what they think might be suitable, without proper knowledge of villages and residents' needs.
- 82 In addition, retirement villages often include a wide range of amenities and services for resident needs and convenience. Services range from communal indoor and outdoor amenity areas, gardens, pools, gyms, libraries, reflection spaces, hairdressing services and cafés and bars through to welfare and medical facilities. These are important amenities and services as many retirement village residents are frail or have mobility restrictions (making it more difficult for them to travel to access amenities and services). They also provide a better quality of life for residents than could be offered without these communal amenities and services. For example, a townhouse would not have space for a pool or gym.
- 83 Retirement villages also use new, low maintenance building products and design techniques to ensure their efficient operation. These design requirements can result in change when compared to surrounding neighbourhoods that were built many decades in the past.
- 84 The experience of RVA members' is that communities (particularly neighbouring landowners seeking to preserve status quo interests) and council officers often can have an expectation as to how sites are going to be used. Typically, that expectation is not for medium or higher density retirement accommodation. In part, this is because, traditionally, planning provisions have ignored the unique features of retirement villages. Further, the significant positive effects and community benefits of retirement villages are sometimes not given sufficient weight.
- 85 The failure of district plans to recognise the functional and operational needs of retirement villages, and provide for change to the character and amenity of existing

neighbourhoods to enable the benefits of retirement villages, has created significant consenting challenges.

- 86 The NPSUD now requires district plans to provide for this change to existing urban environments. It creates an expectation that *"New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations"* (Objective 4). Further, the NPSUD recognises that amenity values can differ among people and communities, and also recognises that changes can be made via increased and varied housing densities and types, noting that changes are not, of themselves, an adverse effect (Policy 6).
- 87 The importance of this direction is also clearly set out in the Ministry for the Environment's (MfE) and the Ministry of Housing and Urban Development's (HUD) final decisions report on the NPSUD, which provides that:<sup>32</sup>

Urban areas are dynamic and complex, continually changing in response to wider economic and social change. The current planning system can be slow to respond to these changing circumstances and opportunities, which can lead to a mismatch between what is enabled by planning and where development opportunity (or demand) exists. This can lead to delays in supply, or incentivise land banking.

- 88 The Enabling Housing Act further supports this need for change by enabling medium density housing to be developed as a minimum in all relevant residential zones. Although the MDRS generally capture retirement villages under the umbrella of residential activities, the framework fails to recognise the unique operational, functional and locational features of retirement villages. Specific provision is therefore necessary to enable much needed retirement housing and care.
- 89 PC2 also needs to provide for change to existing urban environments in order to achieve the intensification envisaged in Policy 3 of the NPSUD. And, in order to respond to the significant issues created by the retirement housing and care crisis, this provision for change should also explicitly acknowledge that the functional and operational needs of retirement villages are a driver of appropriate and necessary change because of demographic ageing and the increasing housing needs of older people.

#### **Recognise the intensification opportunities provided by larger sites**

- 90 As discussed above, sites in existing residential areas that are appropriate for retirement villages are extremely rare, due to the need for sites to be large enough to accommodate all parts of a village and be located in close proximity to community services and amenities. Given large sites are a rare resource, it is important they are developed efficiently to maximise the benefits from their development. This approach is consistent with the enabling intensification approach of the NPSUD.
- 91 As well as providing intensification opportunities, large sites also provide unique opportunities to internalise potential impacts of intensification on neighbours and the neighbourhood. For example, additional height can be located towards the centre of a site without adverse dominance, shading or privacy effects.

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<sup>32</sup> MfE and HUD, *"Recommendations and decisions report on the National Policy Statement on Urban Development"* (Wellington, 2020), page 59.

- 92 This approach was adopted in the Auckland Unitary Plan, with the residential zones including a policy to enable more efficient use of larger sites.<sup>33</sup>

**Recognise the unique internal amenity needs of retirement villages**

- 93 A key consenting challenge faced by the RVA members is an expectation from council officers that the internal amenity controls used for traditional housing typologies (e.g. outlook, sunlight, privacy, outdoor living spaces, landscaping and the like) are appropriate for retirement villages.
- 94 This approach fails to recognise the unique functional and operational needs of retirement villages (discussed above). For example, residents have access to a wide range of communal spaces as well as their individual homes, so their amenity is provided by the village as a whole rather than an individual space. This means that internal amenity standards, such as outlook space, do not have the same level of relevance to retirement villages as to typical residential housing. Other factors, such as proximity to communal spaces, may be more relevant to the overall level of amenity experienced by residents.
- 95 This approach also fails to recognise that retirement village operators have a long and positive track record and understanding of what works for their residents. Over many years they have provided high quality environments for their residents – significantly better than typical housing typologies have delivered. Retirement village operators rely on their reputation, which would be quickly diminished by bad publicity. The quality of life provided to residents is therefore paramount to the RVA's members.
- 96 These points were accepted by the Christchurch Replacement District Plan Independent Hearing Panel:<sup>34</sup>
- [331] Considering costs, benefits and risks, we have decided against imposing internal amenity controls on retirement villages. On this matter, we accept the position of Ryman and the RVA that there is no evidence at this time that there is a problem requiring intervention. We have also borne in mind the caution expressed by Mr Collyns as to the untested impacts of such regulation on the cost of delivering the affordable housing end of the retirement village market. Having said that, we are also mindful that it is at this “affordable” end of the market where residents have the least market power and hence, greatest vulnerability. However, on the basis of Mr Collyns’ evidence, we have assumed that the RVA’s members would act responsibly. Also, we have noted that the Council did not seek to address this topic in its closing submissions and took from that some concurrence with the retirement village sector position as to the lack of any need for regulatory intervention at this time. However, we record that this is a matter where the Council, as plan administrator, has an ongoing plan monitoring responsibility.
- 97 Similarly, a number of internal amenity standards in the Auckland Unitary Plan apply to dwellings, but not to retirement units.<sup>35</sup>
- 98 There are two internal amenity standards in the Enabling Housing Act that the RVA considers require amendment when applied to retirement villages:

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<sup>33</sup> H3.3(8), H4.3(8), H5.3(9).

<sup>34</sup> Decision 10 – Residential (part) (and relevant definitions and associated planning maps) (10 December 2015).

<sup>35</sup> For example, H4.6.12, H4.6.13 and H4.6.15.

98.1 *Outdoor living space:* Retirement villages provide a range of private and communal outdoor areas that can be enjoyed by residents. All of these areas should be counted towards this amenity standard. In addition, retirement village residents tend to spend a significant amount of their recreational time inside, given their sensitivity to temperature extremes. A proportion of these indoor areas should also be counted towards this amenity standard to reflect the actual usage patterns of village residents.

98.2 *Outlook space:* The standard is not workable for all units across a comprehensive site. Furthermore, such a standard is simply not needed. Residents of a village have a much greater degree of choice of 'living rooms' than residents of typical residential dwellings (including communal sitting areas, dining rooms, a library, activity room and chapel). These communal spaces are typically well orientated for daylight and enjoying an outlook into a large and attractive outdoor space.

### **Provide clear and focused matters of discretion**

99 The RVA's members have faced significant cost and delay in consenting retirement villages in residential zones. Often, the process requirements are significantly out of proportion with the adverse effects of the activity, and do not recognise its substantial benefits.

100 An example of this issue is excessive and extraneous information requests. Over time, the amount of information that is required to support an application for consent has substantially increased. Council officers often request information that is not relevant to the assessment of the effects of a retirement village proposal, such as information regarding electricity supply, internal lighting, hallway width, planter box size, and outdoor furniture. It is not uncommon to receive unsolicited design change requests from council urban designers. These requests add cost and delay, and distract from the key issues. Council officers have too much discretion to require applicants to provide further information, and have the ability to wield the threat of notification if the requested information is not provided. By way of example, one RVA member received seven requests for further information following lodgement of an application, which resulted in a five month delay in the decision being issued. Another application resulted in four further information requests and a four month delay.

101 It is therefore important that matters of discretion for decision-making are clear and focused on the aspects that matter.

### **Provide appropriately focused notification rules**

102 Notification is a significant cause of the cost and delay of consenting processes. RMA processes currently provide multiple opportunities for opposition to projects, which is the reason for significant delays in processing consents, and does not ensure good outcomes. Notification is often a cause of much angst for developers. 'NIMBYism' is rife. Self-interested neighbours can create huge delays and disputes for no material environmental benefit.

103 Although notification has an important role in the RM system, it must be proportional to the issues at hand. It is only beneficial, and should only be required, where notification is likely to uncover information that will assist the decision-making process. The costs of public notification are too high for it to be required simply for persons to 'be heard'.

104 Applications for residential activities that are anticipated in residential zones (i.e. through restricted discretionary activity status) should not be publicly notified.

Rather, the time for public participation is at the plan making stage where residential zones and appropriate/inappropriate activities can be clearly identified. This approach aligns with the Enabling Housing Act which precludes public notification for residential proposals.

- 105 Limited notification may remain available in some cases as it provides for neighbours to participate when they are likely to be impacted by a next-door development. However, given the significant costs associated with notification, it should only be required where it will benefit the decision-making process. Where an application meets the expectations for development in an area (i.e. through compliance with external amenity standards), there should be no need for limited notification. This approach aligns with the Enabling Housing Act which precludes limited notification for residential proposals that comply with relevant standards.

**Use the MDRS as a guideline**

- 106 The Enabling Housing Act sets medium density residential standards that guide when residential activities require closer assessment and when limited notification of proposals can be available. The retirement village-specific framework sought by the RVA takes a similar approach (given that retirement villages are a form of development with four or more residential units) with the standards informing matters of discretion and limited notification presumptions.
- 107 The Enabling Housing Act will result in a level of standardisation that will set expectations for the scale of development across the country. The standards have been deemed to 'cover the ground' in relation to the key matters relevant to residential proposals. With some amendments to reflect the specific nature of retirement villages, the RVA considers the standards also set a relevant baseline for identifying standards relevant for the construction of retirement villages.
- 108 Furthermore, it is important PC2 does not inadvertently make retirement village developments more difficult to consent, construct and use than standard residential development. Such an outcome would significantly exacerbate the retirement housing and care crisis that is already resulting in poor wellbeing outcomes for older people.

**Provide for retirement villages in commercial and mixed use zones**

- 109 The RVA's members generally seek to locate their villages in established, good quality residential areas, as these locations are most suited for residents to 'age in place'. However, due to the lack of suitable sites in existing residential areas and need to respond to the retirement living and care crisis, the RVA's members also operate retirement villages in some commercial and mixed use zones where there is good access to services and amenities.
- 110 It is important to note that the Enabling Housing Act is not limited to residential zones and also requires councils to ensure district plans provide for intensification of urban non-residential zones through the Enabling Housing Supply plan changes. As noted, Policy 3 of the NPSUD requires PC2 to enable intensification (through building heights and densities) that respond to the location of centres and rapid transit stops.
- 111 City centre, metropolitan centre, neighbourhood centre, local centre and town centre zones in particular provide opportunities for retirement villages as these areas serve the surrounding local communities and provide close access for amenities to residents who are often unable to walk long distances. Residents' wellbeing is improved when social engagement and intergenerational activities are easily accessible. Many general business areas are also located between centres and residential areas and are therefore potentially suitable for retirement villages.

## **RETIREMENT VILLAGE-SPECIFIC FRAMEWORK**

- 112 To address the issues outlined above, the RVA seeks that PC2 is amended to provide a retirement-village specific framework as follows:

### **Adoption of the MDRS**

- 113 The RVA considers the MDRS must be translated into the District Plan without amendments that read down or alter their interpretation. In some cases the RVA considers amendments to the MDRS are required to ensure they are workable for retirement villages, but these amendments do not change the intent of the MDRS.
- 114 In addition, amendments to other District Plan provisions are necessary to ensure there is no conflict, overlap or inconsistency with the MDRS. The RVA considers that a number of the provisions that are not identified as part of PC2 require amendment for this reason. For example, DO-O12, UEDI-P1 and UFD-P7 conflict with the MDRS and therefore should be amended or removed from the District Plan.
- 115 A number of other provisions also require amendments to remove overlap and inconsistencies with the new objectives and policies inserted to reflect the MDRS. For example, GRZ-P9 and GRZ-P10 set out extensive requirements that now conflict with GRZ-Px1 and GRZ-Px2 (and Policy 1 and 2 of the MDRS).
- 116 A failure to make these amendments will give rise to significant interpretation issues and uncertainty when the Plan is applied.

### **Objectives and policies that appropriately recognise the acute need for retirement housing and care in all relevant residential zones**

- 117 As detailed in this submission, the rapidly aging population is a significant resource management issue. The objectives and policies of the Plan must enable appropriate accommodation and care for the aging population as follows:
- 117.1 An objective to provide for the housing and care needs of the ageing population;
- 117.2 A policy that recognises the need for change over time to the existing character and amenity of neighbourhoods to provide for the diverse and changing needs of the community;
- 117.3 A policy that recognises the need to provide for a range of housing and care options for older people and to recognise the functional and operational needs of retirement villages;
- 117.4 A policy to enable the efficient use of larger sites; and
- 117.5 A policy that directs that density standards are to be used as a baseline for the assessment of the effects of developments.
- 118 It is noted that the District Plan includes Policy GRZ-P16 to provide for the development of supported living accommodation. However, GRZ-P16 is not specific to retirement villages, nor is it sufficiently enabling as it is qualified by a number of matters that are intended to restrict the provision of retirement villages in a manner inconsistent with the MDRS. The policy also does not recognise and provide for the benefits of retirement villages and their functional and operational needs. The RVA considers amendments to Policy GRZ-P16 are therefore required to better enable appropriate accommodation and care for the ageing population.



119 Additional objectives and policies are also required as set out above.

**Rules to enable retirement villages in the GRZ**

120 As detailed in this submission, retirement villages need to be provided for as a residential activity and enabled in the GRZ, as follows:

120.1 A rule that permits the use and operation of retirement villages, recognising that this activity is expected and encouraged in residential zones; and

120.2 A rule that regulates the construction of retirement villages as a restricted discretionary activity, recognising that this activity is anticipated in residential zones with limited matters requiring assessment.

121 The RVA considers retirement villages are required to be restricted discretionary activities under the MDRS as they require *"the construction and use of 4 or more residential units on a site"*.

122 It is noted that PC2 includes Rules GRZ-R4 and GRZ-R19 which regulate supported living accommodation. Under this framework, retirement villages will be discretionary activities given they provide more than one residential unit for more than 6 residents. The RVA opposes the discretionary activity status of Rule GRZ-R19 as it is inconsistent with the requirements of the MDRS.

123 The RVA considers PC2 must include a permitted activity rule for the use and operation of retirement villages and a restricted discretionary rule for the construction of retirement villages.

**Tailored matters of discretion for retirement villages**

124 As detailed in this submission, retirement villages are different to typical residential dwellings, and therefore do not necessarily fit in with the typical controls imposed on residential developments. It is therefore critical to provide a tailored and fit for purpose retirement village matters of discretion, as follows:

124.1 Recognise the positive effects of retirement villages;

124.2 Focus effects assessments on exceedances of relevant standards, effects on the safety of adjacent streets or public open spaces, and effects arising from the quality of the interface between the village and adjacent streets or public open spaces to reflect the policy framework within the Enabling Housing Act. A degree of control over longer buildings is also acknowledged as appropriate; and

124.3 Enable the need to provide for efficient use of larger sites and the functional and operational needs of retirement villages to be taken into account when assessing effects.

125 PC2 fails to include tailored matters of discretion for retirement villages. Under the general rules for new buildings and structures (Rules GRZ-Rx5 – GRZ-Rx7), the matters of discretion include the Residential Design Guide, Centres Design Guide, Centres Design Principles and the Land Development Minimum Requirements. These documents have been developed for standard residential development and are not fit-for-purpose for retirement villages. Further, the Design Guides have not been prepared with the MDRS in mind.

126 The RVA also considers it inappropriate to include the imposition of financial contributions as a matter of discretion, which should not form part of the effects

assessment. In addition, the matters of discretion do not allow for consideration of the positive effects of retirement villages, the functional and operational needs of retirement villages and the need to provide for the efficient use of large sites.

- 127 The RVA seeks retirement village-specific rules (as set out above) with tailored matters of discretion that respond to the particular characteristics of retirement villages.
- 128 It is also important that other rules do not render retirement villages discretionary or non-complying, therefore losing the benefit of clear and focused matters of discretion.

#### **Proportionate notification**

- 129 As noted, a key consenting issue for retirement village operators across the country relates to the delays, costs and uncertainties associated with notification processes. Consistent with the direction of the Enabling Housing Act relating to four or more residential units, applications for retirement villages in the relevant residential zones should not be publicly notified based on density effects. In addition, limited notification should only be used where a retirement village application proposes a breach of a relevant density standard that manages external amenity effects and the relevant effects threshold in the RMA is met.
- 130 It is noted that the general rules for new buildings and structures (Rules GRZ-Rx5 – GRZ-Rx7) preclude public notification of new buildings and structures. However, limited notification is available where the new building/structure does not comply with one or more of the standards under rules GRZ-Rx1 or GRZ-Rx2 (except standard GRZ-Rx1.1) and the relevant RMA effects threshold is met.
- 131 The RVA considers that public notification should be precluded for retirement villages and limited notification should only be available where a retirement village application breaches one or more of the height, height in relation to boundary, setbacks and building coverage standards, and the relevant RMA effects threshold is met.

#### **Clear, targeted and appropriate development standards**

- 132 The RVA considers the development standards for retirement villages should reflect the MDRS, except where amendments are necessary to reflect the particular characteristics of retirement villages. The height, height in relation to boundary, setbacks and building coverage standards should therefore reflect the MDRS. The outdoor living space, outlook space, windows to street and landscaped area standards should generally reflect the MDRS with some amendments. No additional development standards should apply. The RVA therefore seeks various amendments to Rule GRZ-Rx1 to reflect the particular characteristics of retirement villages.

#### **Providing for retirement villages in commercial, mixed use and other zones**

- 133 As discussed above, commercial and mixed use zones enable mixed uses, including residential activities, and may contain suitable sites for retirement villages.
- 134 In order to give effect to Policy 3 of the NPSUD, PC2 must provide for intensification in these zones. The RVA seeks that fit for purpose retirement village planning provisions are applied in the Local Centre, Mixed Use, Town Centre and Metropolitan Centre zones, similar to those proposed for residential zones.
- 135 The District Plan also includes two development areas. The RVA considers the provisions applying to these areas require amendments to address conflicts with the

MDRS. It also seeks that fit for purpose retirement village planning provisions are applied in these zones.

### **Financial contributions**

- 136 PC2 introduces new 'General Rules for Financial Contributions' that will capture retirement villages to the extent they include 'residential units'.
- 137 The financial contributions regime would result in contributions being required for reserves (until a plan change occurs), for infrastructure and for offsetting or compensation of adverse effects. The Council's Development Contributions Policy already addresses contributions for infrastructure and the RVA is concerned the regime may result in 'double dipping'. The RVA considers greater clarity is needed to ensure the scope of the financial contributions regime is distinct from the Development Contributions Policy.
- 138 The proposed financial contributions standards (FC-R5 to Table x2) set out a methodology for calculating infrastructure and offsetting/compensation financial contributions. The RVA is highly concerned that there is no certainty for developers as to the financial contributions they will be required to pay. This uncertainty is likely to result in delay and cost for developers as well as objections and appeals. It will deter development.
- 139 The RVA seeks a clear and transparent regime for financial contributions which ensures contributions required are proportionate to the demand created by retirement villages.
- 140 Retirement villages have a substantially lower demand profile than standard residential developments due to low occupancy levels (1.3 residents per retirement unit and 1 resident per aged care room care unit, compared to around 2.6 residents per standard dwelling) and reduced activity levels of the residents due to their age and frailty. In particular, retirement villages have substantially lower demands than typical housing types in the following areas the financial contributions regime would cover:
- 140.1 Reserves – due to their age and frailty older people living in retirement villages use council reserves, sports grounds and the like substantially less than other age groups. Retirement village residents are less mobile. And, the provision of on-site amenities at villages to cater for residents' specific needs significantly reduces residents' need to travel to access care, services or entertainment.
- 140.2 Transport – retirement villages are very low traffic generators. Residents use public transport infrequently, and traffic generation is mostly off-peak as residents do not travel for school drop-offs or work. Even with staff and visitors accounted for, traffic generation is much lower than typical housing.
- 140.3 Water, wastewater – residents use less water, and produce much less wastewater due to lower occupancy levels of retirement units and different living needs.
- 141 In some cases, the RVA's members as part of their proposals also construct public infrastructure, such as roading and stormwater infrastructure, which adds capacity to the network for wider public benefit. The proposed matters for consideration in FC-Table x2 do not take into account infrastructure works undertaken by developers.
- 142 The RVA seeks amendments to the Financial Contributions chapter to:

- 142.1 Ensure the dual financial and development contributions regimes will not result in double dipping;
- 142.2 Provide certainty as to the financial contributions that will be required to be paid;
- 142.3 Ensure the calculation methodology takes into account cost of works undertaken as part of development; and
- 142.4 Provide a retirement village-specific regime for retirement villages that takes into account their substantially lower demand profile compared to standard residential developments.

**DECISION SOUGHT**

- 143 The RVA seeks:
  - 143.1 Amendments to PC2 as set out in paragraphs 113-142 above;
  - 143.2 Without limiting the generality of the above, the specific relief set out in **Appendix 1**; and
  - 143.3 Any alternative or consequential relief to address the matters addressed in this submission.
- 144 The RVA wishes to be heard in support of this submission.
- 145 If others make a similar submission, the RVA will consider presenting a joint case with them at a hearing

**Signed** for and on behalf of Retirement Villages Association of New Zealand Incorporated  
by John Collyns

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John Collyns, Executive Director  
27 September 2022

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## APPENDIX 1 – SPECIFIC SUBMISSION POINTS AND RELIEF SOUGHT

### PART 1 – INTRODUCTION AND GENERAL PROVISIONS

Provisions	Submission Position	Reason for Submission	Relief Sought
<b>Definitions – Retirement Unit</b>	New definition sought	The RVA considers that a 'retirement unit' definition is required in the District Plan as a result of its submissions on Plan Change 2 to acknowledge the differences from typical residential activities in terms of layout and amenity needs.	<p><i>The RVA seeks to add the following 'retirement unit' definition to the District Plan:</i></p> <p><b><u>Retirement Unit</u></b></p> <p><u>means any unit within a retirement village that is used or designed to be used for a residential activity (whether or not it includes cooking, bathing, and toilet facilities). A retirement unit is not a residential unit.</u></p>

### PART 2 – DISTRICT-WIDE MATTERS

Provisions	Submission Position	Reason for Submission	Relief Sought
<b>All provisions</b>	Oppose	The RVA opposes the inclusion of lengthy explanation text within PC2. It considers the planning direction should be clearly set out in the operative provisions. Explanation text has no clear role and increases interpretation uncertainties.	<i>The RVA seeks the deletion of the explanation text throughout PC2 with relevant text to be integrated into the operative provisions.</i>

Provisions	Submission Position	Reason for Submission	Relief Sought
<b>District Objectives – Objective DO-O3</b>	Support	<p>The RVA supports DO-O3 to the extent it is consistent with the NPSUD and MDRS.</p> <p>The RVA opposes the objective to the extent it fails to recognise the need to provide for retirement villages in all residential zones, not just near centres and transport corridors.</p> <p>The RVA considers this policy needs to recognise and provide for the housing and care needs of the ageing population for the reasons set out in the submission.</p> <p>The RVA considers this policy also needs to recognise the intensification opportunities provided by larger sites within the General Residential Zone for the reasons set out in the submission.</p>	<p><i>The RVA seeks to amend DO-O3 to address any conflicts with the NPSUD or MDRS and to provide for retirement villages in all residential zones.</i></p> <p><i>The RVA seeks the addition of the following clauses to DO-O3:</i></p> <ol style="list-style-type: none"> <li>4. <u>residential development that recognises and enables the housing and care needs of the ageing population;</u></li> <li>5. <u>residential development that recognises the intensification opportunities provided by larger sites by providing for more efficient use of those sites;</u></li> </ol>
<b>District Objectives – Objective DO-Ox1</b>	Support	The RVA supports DO-Ox1 as it aligns with Objective 1 of the MDRS.	Retain DO-Ox1 as notified.
<b>District Objectives – Objective DO-Ox2</b>	Support	The RVA supports DO-Ox2 as it aligns with Objective 2 of the MDRS.	Retain DO-Ox2 as notified.
<b>District Objectives – Objective DO-Ox3</b>	Support	The RVA supports DO-Ox3 to the extent it aligns with NPSUD Policy 3. The RVA considers the objective is inconsistent with the direction in Policy 3 to provide for building heights of “at least” 6 storeys in relevant locations.	Amend DO-Ox2 to refer to buildings of “at least” 6 storeys (not “up to”).

Provisions	Submission Position	Reason for Submission	Relief Sought
<b>District Objectives – Objective DO-O11</b>	Oppose in part	The RVA supports the recognition that the character and amenity of the District will change over time in response to the diverse and changing needs of people, communities and future generations as this is consistent with Objective 4 of the NPSUD. However, the RVA opposes the drafting of this objective which qualifies and dilutes the direction in Objective 4 of the NPSUD.	<i>The RVA seeks DO-O11 is amended to read:</i> <b>DO-O11 Character and Amenity Values</b> To provide for the character and amenity values of the District’s urban environments to develop and change over time in response to the diverse and changing needs of people, communities and future generations.
<b>DO-O12 Housing Choice and Affordability</b>	Oppose in part	The RVA opposes this objective to the extent that it is inconsistent with the MDRS, by referencing concepts such as ‘suitable urban and rural locations’ and ‘enhancing the amenity of living environments’, and considers it must be amended for the reasons set out in its submission above.	Delete DO-O12 or amend for consistency with the MDRS.
<b>District Objectives – Objective DO-O16</b>	Oppose in part	The RVA supports the provision in DO-O16 for a higher density urban built character in the Metropolitan Centre Zone, Town Centre Zone, Mixed Use Zone and Local Centre Zone. However, the RVA considers the objective is inconsistent with the direction in Policy 3 to provide for building heights of “at least” 6 storeys in relevant locations.	Amend DO-O16 to refer to buildings of “at least” the relevant number of storeys (not “up to”).
<b>Urban and Environmental Design and Incentives – UEDI-P1</b>	Oppose in part	The RVA suggests UEDI-P1 requires amendment to align with the MDRS. It promotes “quality urban design outcomes” which is a vague concept that is not defined in the Plan.	<i>Delete UEDI-P1 or amend for consistency with the MDRS.</i>

Provisions	Submission Position	Reason for Submission	Relief Sought
<b>Urban and Environmental Design and Incentives – UEDI-P2</b>	Support in part	<p>The RVA does not oppose a requirement in UEDI-P2 for development to “consider” the CPTED guidelines, but opposes the use of the word “consistent” in relation to guidelines.</p> <p>The RVA opposes the requirement for development to be consistent with the Land Development Minimum Requirements, which are not suitable for all developments. The document makes only one mention of retirement villages, and there is no guidance provided as to why the requirements that are applicable to non-retirement village activities apply in the same manner to retirement villages (despite retirement villages being a unique activity with substantially differing functional and operational needs).</p>	<p>The RVA seeks UEDI-P2 is amended as follows:</p> <p><u>The design of development, use and subdivision will consider</u> <del>be consistent with the Land Development Minimum Requirements and</del> Crime Prevention through Environmental Design (CPTED) Guidelines to enhance safety and security of residents and visitors.</p>
<b>Urban Form and Development – Policy UFD-Px</b>	Oppose in part	<p>The RVA supports UFD-Px and its provisions for heights and densities of urban form that enable more people to live in the District’s urban environments in accordance with the provisions of the NPSUD Policy 3. However, the RVA considers the objective is inconsistent with the direction in Policy 3 to provide for building heights of “at least” 6 storeys in relevant locations. It is also inconsistent with the direction in the MDRS for the planned urban built character to “include” 3-storey buildings.</p> <p>The RVA also opposes the direction to “avoid” inappropriate buildings, activities, heights and densities in qualifying matter areas. In many</p>	<p>Amend UFD-Px to refer to buildings of “at least” or “including” (as relevant) the relevant number of storeys (not “up to”).</p> <p>Amend UFD-Px to refer to “managing” inappropriate buildings, activities, heights and densities (not “avoiding”).</p>



Provisions	Submission Position	Reason for Submission	Relief Sought
		qualifying matter areas, intensification can occur, albeit some additional mitigation may be required.	
<b>Urban Form and Development – Policy UFD-P1</b>	Oppose in part	<p>The RVA supports UFD-P1 and its provision for new urban development for residential activities in existing urban areas and identified growth areas, in a manner providing for a variety of housing types and densities and enabling increased housing densities.</p> <p>The RVA considers however that the ‘maintaining’ of a consolidated urban form within existing urban areas and a limited number of identified growth areas contradicts DO-O3 which also provides for the development of new urban areas. Without inclusion of provisions for the development of new urban areas, UFD-P1 will present a restriction to urban development that contradicts the MDRS.</p>	<i>The RVA seeks that UFD-P1 is amended to acknowledge and provide for the development of new urban areas, and to ensure consistency with the MDRS.</i>
<b>Urban Form and Development – Policy UFD-P2</b>	Support in part	<p>The RVA supports UFD-P2 and its encouraging of an increased mix of housing forms and types which cater for increased variety and densities of housing (including housing for older persons), and a range of allotment sizes and land tenure arrangements to facilitate these typologies.</p> <p>The RVA considers that alongside ‘housing for older persons’, retirement villages should be specifically identified as being provided for. The term ‘housing for older persons’ is not defined in the District Plan,</p>	<p><i>The RVA seeks UFD-P2 is amended to ensure consistency with the MDRS and to include specific reference to retirement villages in UFD-P2:</i></p> <p><b>URD-P2 Housing Choice</b></p> <p>An increased mix of housing forms and types will be encouraged within parts of the District where increased variety and densities of housing are able to cater for changing demographics, while encouraging high <u>quality development</u> <del>amenity values</del>. This will include provision for:</p>

Provisions	Submission Position	Reason for Submission	Relief Sought
		<p>whereas the term 'retirement village' is defined in the National Planning Standards.</p> <p>The RVA considers the reference to "encouraging high amenity values" in this Policy does not recognise that the amenity values within those parts of the District where an increased mix of housing forms and types are encouraged will change over time, in line with Objective 4 NPSUD and DO-O11. It also does not implement MDRS Policy 5 regarding "encouraging high-quality development".</p>	<ol style="list-style-type: none"> <li>1. ...</li> <li>2. Housing for older persons;</li> <li>2A. Retirement villages;</li> </ol>
<b>Urban Form and Development – Policy UFD-P3</b>	Support in part	<p>The RVA considers this policy is unclear as it is not clear how residential intensification is to "give consideration to" effects on character and amenity values. It also fails to recognise that the character and amenity of the District will change over time in response to the diverse and changing needs of people, communities and future generations. The RVA considers PC2 must give clear guidance as to the role of density standards in informing the assessment of effects as set out in the submission.</p>	<p><i>The RVA seeks to amend UFD-P3 as follows to integrate recognition that the character and amenity of the District will change over time:</i></p> <p><b>UFD-P3 Managing Intensification</b></p> <p><del>Residential intensification will give consideration to</del>  <u>The effects of subdivision and development on character and amenity values will be assessed where these are provided for in the District Plan, while recognising that the character and amenity of the District will change over time in response to the diverse and changing needs of people, communities and future generations.</u></p> <p><i>The RVA seeks to add the following policy:</i></p> <p><b><u>Role of density standards</u></b></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
			<u>Enable the density standards to be utilised as a baseline for the assessment of the effects of developments.</u>
<b>Urban Form and Development – Policy UFD-P4</b>	Oppose in part	The RVA opposes UFD-P4 as it fails to recognise the functional and operational requirements of retirement villages and the different forms and densities of development associated with retirement villages.	<i>Amend UFD-P4 to refer to an area specific approach "generally" applying.  The RVA seeks a new retirement village-specific policy as set out below.</i>
<b>Urban Form and Development – Policy UFD-P7</b>	Oppose in part	The RVA considers that, as currently phrased, UFD-P7 is inconsistent with the MDRS and presents a barrier / restriction to the level of intensification sought by the Enabling Housing Act noting that changes to zoning in the District provide for / enable greater intensification in all appropriately zoned areas regardless of their proximity to public open space. It also fails to recognise that retirement villages provide communal open spaces on site.	<i>The RVA seeks to delete UFD-P7.</i>
<b>Urban Form and Development – Policy UFD-P11</b>	Oppose in part	The RVA considers UFD-P11 is unclear as to when it applies. It should only apply to development within areas of significant/national importance or reserves.  The RVA supports the policy's provisions for undertaking development in a manner that considers effects on the amenity values while recognising that these values will develop and change over time in response to the diverse and	<i>Amend UFD-P11 to clarify that it only applies to development within areas that have been identified in the plan as areas of significant/national importance or reserves.</i>

Provisions	Submission Position	Reason for Submission	Relief Sought
		changing needs of people, communities and future generations.	
<b>Urban Form and Development – Policy UFD-P11</b>	Oppose in part	The RVA queries why PC2 uses the General Residential Zone and a Residential Intensification precinct, rather than the Medium Density Residential Zone and High Density Residential Zone in line with the National Planning Standards and other plan changes under the Enabling Housing Act.	<i>Adopt a zoning framework based on the Medium Density Residential Zone and High Density Residential Zone.</i>
<b>Energy, Infrastructure and Transport – Policy TR-P1</b>	Oppose in part	The RVA considers the policy is inconsistent with the Enabling Housing Act which does not require development to be located based on the transport network hierarchy.	<i>Amend policy to achieve consistency with the MDRS.</i>
<b>Energy, Infrastructure and Transport – Policy TR-P2</b>	Oppose in part	<p>The RVA supports TR-P2's provisions for the integration of development with a transport system that offers a wide range of travel mode choices, which connects residents to essential community services, centres and social infrastructure. The RVA considers however that the list of measures through which sustainable transport and maximised mode choice are to be achieved are not relevant / necessary for all developments, and as such the policy should be amended to reflect this.</p> <p>The RVA also opposes the requirement in (5) applying to retirement villages given the lower</p>	<p><i>The RVA seeks to amend TR-P2 as follows to acknowledge that not all measures listed in the policy are relevant / necessary for all developments:</i></p> <p><b>TR-P2 Sustainable Transport and Maximising Mode Choice</b></p> <p>Development and subdivision will be integrated with a transport system that <del>offers</del> <u>encourages</u> a wide range of travel mode choices, <del>which</del> <u>and the connections of</u> residents to essential community services, centres and social infrastructure, through <u>measures such as:</u></p> <p>...</p>

Provisions	Submission Position	Reason for Submission	Relief Sought
		levels of traffic generated by retirement villages compared to standard development.	
<b>Energy, Infrastructure and Transport - Transport – Rule TR-R10</b>	Oppose in part	<p>Retirement villages typically generate vpd exceeding 200 vpd in Working Zones, and / or 100 vpd in all other zones, so would meet the definition of 'major traffic activity(ies)'.</p> <p>The RVA considers regulation of trip generation should be based on peak hour movements, not daily movements, as peak movements are what affects capacity. Further, the policy should recognise that trip generation from a site is an anticipated component of development and the focus of regulation should be on higher than anticipated trip generation.</p> <p>The RVA considers the matters of discretion are overly broad and should be focused on the particular effects of relevance to exceeding the standard.</p>	<p><i>Amend TR-R10 to provide a peak hour vehicle movement standard.</i></p> <p><i>Amend TR-R10 so the matters of discretion require consideration of whether the development generates the same or less traffic than anticipated by the site zoning. Remove broad and unclear matters of discretion.</i></p>
<b>General District-Wide Matters - Financial Contributions</b>	Oppose in part	<p>The RVA opposes the use of dual financial and development contributions regimes due to the risk of double dipping. It supports the use of a financial contributions regime, if the development contributions regime is removed.</p> <p>The RVA supports the various statements in the introduction to the Financial Contributions chapter, FC-R5 and in Table x2 that suggest double dipping will not occur. However, it considers the overlap</p>	<p>The RVA seeks amendments to:</p> <ul style="list-style-type: none"> <li>- Ensure the dual financial and development contributions regimes will not result in double dipping;</li> <li>- Provide certainty as to the financial contributions that will be required to be paid;</li> <li>- Ensure the calculation methodology takes into account cost of works undertaken as part of development; and</li> </ul>

Provisions	Submission Position	Reason for Submission	Relief Sought
		<p>between the regimes creates a high risk of double dipping.</p> <p>The RVA is concerned that the Financial Contributions Chapter does not clearly set out the financial contributions that will be required, with costs having to be calculated for each individual development based on matters for consideration rather than a clear formula.</p> <p>The Chapter also does not recognise the bespoke demand characteristics of retirement villages or the need to provide credit for works carried out as part of development.</p>	<ul style="list-style-type: none"> <li>- Provide a retirement village-specific regime for retirement villages that takes into account their substantially lower demand profile compared to standard residential developments.</li> </ul>

### PART 3 – AREA SPECIFIC MATTERS

Provisions	Submission Position	Reason for Submission	Relief Sought
<b>General Residential Zone – Introductory Sections</b>	Support in part / Oppose in part	<p>The RVA supports the general description provided in the General Residential Zone that outlines where higher density development can be expected to occur. However, it considers that as currently phrased the description is inconsistent with the MDRS and presents a barrier / restriction to the level of intensification sought by the Enabling Housing Act, by providing for higher densities of development in areas 'well served by public</p>	<p><i>The RVA seeks to amend the second paragraph of the General Residential Zone section as follows:</i></p> <p>A mix of housing densities are provided for throughout the Zone, with higher densities enabled in areas <u>including those</u> that are well served by public transport or are close to a range of commercial activities and community services <u>or where services and amenities can be provided for within the development.</u></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
		<p>transport' or in areas that 'are close to a range of commercial activities and community services'. The RVA acknowledges these requirements are based off the NPSUD, but suggests that if not included verbatim from the NPSUD they will lead to interpretation issues and unnecessarily restrict the level of intensification anticipated under the MDRS.</p> <p>The RVA opposes the reference to the design guidelines as they make no reference to retirement villages, and provide no guidance as to why the requirements that are applicable to non-retirement village activities apply in the same manner to retirement villages (despite retirement villages being a unique activity with substantially differing functional and operational needs). The RVA considers that retirement villages can be of a 'high standard' without being consistent with the design guidelines.</p> <p>The RVA submits the reference to encouraging new development to 'contribute positively' to the changing character of the Zone is not a requirement of the MDRS. Furthermore, the RVA submits it is unclear what this would entail, particularly when considering that the definition of a 'well-functioning urban environment' consists of a list of positive/beneficial matters and is already referred to in the Introductory section. It is not clear if this phrasing is stipulating that additional</p>	<p><i>The RVA seeks to amend the third paragraph of the General Residential Zone section as follows:</i></p> <p>It is anticipated that the form, appearance and amenity of neighbourhoods within the Zone will change over time. <u>Where appropriate, design</u> guidelines help manage this change by promoting a high standard of urban design and encouraging new development to contribute <del>positively</del> to the changing character of the Zone.</p>

Provisions	Submission Position	Reason for Submission	Relief Sought
		benefit is required in order to contribute 'positively'.	
<b>General Residential Zone – Policy GRZ-Px1</b>	Support	The RVA supports GRZ-Px1 as it aligns with Policy 1 of the MDRS.	<i>Retain GRZ-Px1 as notified.</i>
<b>General Residential Zone – Policy GRZ-Px2</b>	Support	The RVA supports GRZ-Px2 as it aligns with Policy 2 of the MDRS.	<i>Retain GRZ-Px2 as notified.</i>
<b>General Residential Zone – Policy GRZ-Px3</b>	Support	The RVA supports GRZ-Px3 as it aligns with Policy 3 of the MDRS.	<i>Retain GRZ-Px3 as notified.</i>
<b>General Residential Zone – Policy GRZ-Px4</b>	Support	The RVA supports GRZ-Px4 as it aligns with Policy 4 of the MDRS.	<i>Retain GRZ-Px4 as notified.</i>
<b>General Residential Zone – Policy GRZ-Px5</b>	Support	The RVA supports GRZ-Px5 as it aligns with Policy 5 of the MDRS.	<i>Retain GRZ-Px5 as notified.</i>
<b>General Residential Zone – Policy GRZ-Px6</b>	Oppose in part	<p>The RVA supports GRZ-Px6 in principle in terms of providing for higher-density housing, however it considers that outcome should be achieved through the High Density Residential Zone.</p> <p>The RVA opposes the requirement to meet the needs of the Residential Design Guide, which makes no specific reference to retirement villages,</p>	<p><i>Apply the High Density Residential Zone, rather than precincts.</i></p> <p><i>The RVA seeks to amend GRZ-Px6 to remove the reference to developments meeting the requirements of the Residential Design Guide.</i></p>



Provisions	Submission Position	Reason for Submission	Relief Sought
		<p>and there is no guidance provided as to why the requirements that are applicable to non-retirement village activities apply in the same manner to retirement villages (despite retirement villages being a unique activity with substantially differing functional and operational needs).</p> <p>In this regard, retirement villages should be considered against the built form standards they do not comply with. The Residential Design Guide does not align with the expectations under the NPSUD or Enabling Housing Act.</p>	
<b>General Residential Zone – Policy GRZ-P9</b>	Oppose in part	<p>The RVA supports GRZ-P9 and its provision for residential activities that include the provision of housing types which meet the need of households (4). However, the RVA opposes:</p> <p>Clause 2, which refers to development being “compatible” with the planned built character, rather than “responding to” the planned built character in line with MDRS objective 2.</p> <p>Clause 5, which seeks for the number of residential units per allotment to be limited, being restrictive in nature (particularly for activities such as retirement villages which typically comprise of multiple residential units), which does not align with the intensification purpose of the Enabling Housing Act.</p>	<i>The RVA seeks to amend Clause 2 to replace “compatible with” with “responds to” and remove Clause 5 from GRZ-P9 to remove reference to the limiting of the number of residential units per allotment.</i>

Provisions	Submission Position	Reason for Submission	Relief Sought
<b>General Residential Zone – Policy GRZ-P10</b>	Oppose in part	<p>The RVA opposes in part GRZ-P10 and its requirement to achieve a high level of on-site amenity beyond the requirements of the MDRS. The regulation of on-site amenity within a retirement village is opposed, as retirement village operators are best placed to understand the needs of its residents. Internal amenity matters are also covered by the MDRS provisions and Council cannot seek to impose more stringent requirements. The RVA's members frequently come across issues during consenting processes where council officers attempt to influence retirement villages' internal layouts based on their understanding of design principles which only apply to traditional housing types.</p> <p>The policy also fails to recognise the functional and operational requirements of retirement villages, for example by clause 2 referring to "private" outdoor living space and not "communal" space.</p>	<i>The RVA seeks to amend GRZ-P10 to acknowledge that the residential amenity principles do not apply to retirement villages. A retirement-village specific policy and rule framework (see below) will encourage high-quality retirement village development.</i>
<b>General Residential Zone – Policy GRZ-P11</b>	Oppose in part	The RVA considers this policy is inconsistent with Policy 3 of the MDRS, and covers matters included under GRZ-Px3. Amendments are required to remove the conflict. Development should not be required to be undertaken "in accordance with" a Guideline document.	<i>The RVA seeks that Policy GRZ-P11 is deleted, or amended to align with the MDRS.</i>

Provisions	Submission Position	Reason for Submission	Relief Sought
<b>General Residential Zone – Policy GRZ-P12</b>	Oppose in part	<p>The RVA supports GRZ-P12 to the extent it is consistent with the landscaping requirements in the MDRS.</p> <p>However, the RVA considers that the phrasing of GRZ-P12 generates requirements for residential developments that go beyond those set out in the MDRS. The RVA considers that rather than 'requiring' these landscaping matters, they should be 'encouraged'.</p>	<p><i>The RVA seeks to amend GRZ-P12 as follows to change the 'requirement' level of landscaping matters to be an 'encouragement' of landscaping matters.</i></p> <p><b>GRZ-P12 Landscaping</b></p> <p>Landscaping will be required for non-residential activities and residential development in the Residential Zones to enhance residential amenity, while promoting water conservation and biodiversity and allowing for the natural infiltration of surface water through permeable treatments, <u>in accordance with the density standards.</u> <u>Encourage landscaping will to be located and designed in accordance with the following principles:</u></p> <p>1. ...</p>
<b>General Residential Zone – Policy GRZ-P13</b>	Oppose in part	<p>The RVA opposes this policy to the extent that it seeks to manage development in the GRZ in a manner that is inconsistent with the MDRS (which does not include energy efficiency requirements), as the policy may have the effect of limiting residential development, particularly retirement village development. It is considered that the retention of this policy and its continued application to retirement villages within the GRZ creates a conflict with the MDRS.</p>	<p><i>The RVA seeks that GRZ-P13 is deleted.</i></p>
<b>General Residential Zone – Policy GRZ-P16</b>	Oppose in part	<p>The RVA supports the inclusion of a retirement village specific policy in the General Residential Zone but considers the policy needs to be amended</p>	<p><i>The RVA seeks a new retirement village policy:</i></p> <p><b>Provision of housing for an ageing population</b></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
		<p>to apply to retirement villages as a whole, and not just retirement accommodation (which is specified to be a subcategory of retirement village). The RVA opposes retirement villages being bundled with various forms of “supported living accommodation”.</p> <p>The RVA considers the policy is in conflict with the MDRS and therefore needs to be amended as part of the PC2 process. In particular, clause 3 of the policy conflicts with the MDRS in that it seeks to manage the form, scale and design of development in a manner that is inconsistent with the direction provided in the Enabling Housing Act, noting that the MDRS provisions enable greater intensification that would be limited by a need for development to ‘reflect the residential nature and character of the location’.</p> <p>The RVA considers GRZ-P16 must give effect to the direction under the NPSUD that acknowledges amenity values evolve over time, and that expectations for existing amenity must also evolve in order to enable necessary housing. Changes to amenity values are not of themselves an adverse effect.</p> <p>The RVA also considers GRZ-P16 must recognise the functional and operational needs of retirement villages, which result in building formats that tend to be higher intensity than surrounding residential neighbourhoods.</p>	<p>1. Provide for a diverse range of housing and care options that are suitable for the particular needs and characteristics of older persons in [add] zone, such as retirement villages.</p> <p>2. Recognise the functional and operational needs of retirement villages, including that they:</p> <ul style="list-style-type: none"> <li>a. May require greater density than the planned urban built character to enable efficient provision of services.</li> <li>b. Have unique layout and internal amenity needs to cater for the requirements of residents as they age.</li> </ul> <p><i>In the alternative, the RVA seeks to amend GRZ-P16 as follows to align the principles to be in accordance with the MDRS:</i></p> <p><b>GRZ-P16 Supported Living and Older Persons Accommodation</b></p> <p>The development of supported living accommodation will be provided for in a range of forms, including units, minor residential units, complexes, shared accommodation, rest homes and retirement <u>villages accommodation</u>, where it is located within the Residential Zones <del>and integrated with the surrounding environment to meet the particular needs and characteristics of older persons</del>. Supported living accommodation includes accommodation <u>that is suitable for the particular needs and characteristics of older persons</u>. <del>specifically designed for older persons.</del></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
		<p>In addition, retirement villages are carefully designed to ensure maximum safety is provided to residents, and this often consists of private internal road networks with lowered speed limits and multiple traffic calming devices. As such, the RVA considers that the requirement to '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' may result in adverse safety effects on / to residents, and is not appropriate for retirement villages.</p> <p>The RVA also considers that additional content should be linked into GRZ-P16 to provide for and acknowledge the diverse range of housing and care options that are suitable for the particular needs and characteristics of older persons.</p>	<p>Supported living accommodation will be undertaken in accordance with the following principles:</p> <ol style="list-style-type: none"> <li>1. ...</li> <li>2. ...</li> <li>3. the scale and design of development will <del>reflect</del> <u>be consistent with</u> the residential nature and character of the location, <u>recognising that the residential nature and character will change over time to enable a variety of housing types with a mix of densities,</u> <del>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;</del> and</li> <li>4. ...</li> <li>5. <u>the development will recognise the functional and operational needs of retirement villages, including that they:</u> <ol style="list-style-type: none"> <li>a. <u>may require greater density than the planned urban built character to enable efficient provision of services;</u> and</li> <li>b. <u>have unique layout and internal amenity needs to cater for the requirements of residents as they age.</u></li> </ol> </li> </ol>

Provisions	Submission Position	Reason for Submission	Relief Sought
<b>General Residential Zone - Policies</b>	New policy sought	The RVA considers that it is appropriate for the District Plan to recognise the intensification opportunities of larger sites for the reasons set out in the submission.	<p><i>The RVA seeks a new policy as follows:</i></p> <p><b>Larger sites</b></p> <p>Recognise the intensification opportunities provided by larger sites within the [add] zone by providing for more efficient use of those sites.</p>
<b>General Residential Zone - Policies</b>	New policy sought	The RVA considers that it is appropriate for the density standards to be utilised as a baseline for the assessment of the effects of developments.	<p><i>The RVA seeks that a new policy is inserted in the General Residential Zone that enables the density standards to be utilised as a baseline for the assessment of the effects of developments.</i></p> <p><b>GRZ-PX</b>      <u>Role of density standards</u></p> <p><u>Enable the density standards to be utilised as a baseline for the assessment of the effects of developments.</u></p>
<b>General Residential Zone - Policies</b>	New policy sought	In addition to the current general policies for all residential zones, as noted in the submission above, the RVA considers that a policy is required that recognises the diverse and changing residential needs of communities, and that the existing character and amenity of the residential zones will change over time to enable a variety of housing types with a mix of densities.	<p><i>The RVA seeks that a new Policy is inserted in the General Residential Zone chapter that recognises the diverse and changing community needs and that the existing character and amenity of the residential zones will change over time.</i></p> <p><b>RESZ-PX Changing communities</b></p> <p>To provide for the diverse and changing residential needs of communities, recognise that the existing character and amenity of the residential zones will change over time to enable a variety of housing types with a mix of densities.</p>

Provisions	Submission Position	Reason for Submission	Relief Sought
<b>General Residential Zone – Rule GRZ-R4</b>	Oppose	The RVA considers retirement villages as a use/activity should be provided for as a permitted activity in residential zones. The standards limiting this permitted activity rule to 6 residents / one residential unit in this rule are inappropriate.	<i>The RVA seeks a permitted activity rule for retirement villages that is not subject to any standards.</i>
<b>General Residential Zone – Rule GRZ-Rx1 Standards</b>	Support in part	<p>The RVA supports GRZ-Rx1 and associated standards in principle, as they align with the density standards of the MDRS.</p> <p>The RVA considers however that the following amendments should be made:</p> <ul style="list-style-type: none"> <li>- Number of residential units per site – with the addition of the definition proposed by the RVA above, this standard should be amended to refer to 'retirement units';</li> <li>- Height in relation to boundary - additional exclusions should be integrated with the standard to reflect that some developments may occur adjacent to less sensitive zones;</li> <li>- Outdoor living space - as a result of retirement villages providing a range of private and communal outdoor areas, amendments should be made that enable the communal areas to count towards the amenity standard;</li> <li>- Outlook space – in a retirement village environment (that has multiple communal spaces available for residents) the outlook space standard is not directly relevant.</li> </ul>	<p><i>The RVA seeks to amend the GRZ-Rx1 standards as follows:</i></p> <p><b>GRZ-Rx1</b> New buildings and structures, and any minor works, additions or alterations to any building or structure.</p> <p>...</p> <p><b>Standards</b></p> <p>Number of residential units <u>or retirement units</u> per site</p> <ol style="list-style-type: none"> <li>1. There must be no more than 3 residential units <u>or retirement units</u> per site.</li> </ol> <p>...</p> <p>Height in relation to boundary</p> <ol style="list-style-type: none"> <li>3. ...</li> </ol> <p>This standard does not apply to:</p> <ol style="list-style-type: none"> <li>a. ...</li> <li>b. ...</li> <li>c. ...</li> </ol>

Provisions	Submission Position	Reason for Submission	Relief Sought
		<p>Amendments should be made to the standard to provide for outlook space requirements that are appropriate for retirement villages;</p> <ul style="list-style-type: none"> <li>- Windows to street - the standard should be amended to provide for retirement units; and</li> <li>- Landscaped area - the standard should be amended to provide for retirement units also.</li> </ul> <p>However, retirement villages will likely infringe the number of residential units per site standard (GRZ-Rx1), so the construction of retirement villages will be a restricted discretionary activity under this rule. The RVA considers that the construction of retirement villages should have focused matters of discretion (so to provide for and acknowledge the differences that retirement villages have from other residential activities). This relief is addressed in response to GRZ-Rx5 further below.</p>	<p>d. <u>Boundaries adjoining open space and recreation zones, rural zones, commercial and mixed use zones, industrial zones and special purpose zones.</u></p> <p>...</p> <p>Outdoor living space (per unit)</p> <p>6. ...</p> <p>7. ...</p> <p>8. <u>For retirement units, clauses 6 and 7 apply with the following modifications:</u></p> <p>(a) <u>The outdoor living space may be in whole or in part grouped cumulatively in 1 or more communally accessible location(s) and/or located directly adjacent to each retirement unit; and</u></p> <p>(b) <u>A retirement village may provide indoor living spaces in one or more communally accessible locations in lieu of up to 50% of the required outdoor living space.</u></p> <p>Outlook space (per unit)</p> <p><del>8.9.</del></p> <p>h. ...</p> <p>i. <u>For retirement units, clause 9(a) – (h) apply with the following modifications: The minimum dimensions for a required outlook space are 1 metre in</u></p>



Provisions	Submission Position	Reason for Submission	Relief Sought
			<p><u>depth and 1 metre in width for a principal living room and all other habitable rooms.</u></p> <p>Windows to Street</p> <p>9-10. A residential unit <u>or retirement unit</u> facing <del>the</del> <u>a public</u> street must have a minimum of 20% of the street-facing façade in glazing. This can be in the form of windows or doors.</p> <p>Landscaped area</p> <p><del>10-</del>11. A residential unit <u>or retirement unit</u> at ground floor level must have a landscaped area of a minimum of 20% of s developed site with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.</p> <p><del>11-</del>12. 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>or retirement unit</u>.</p>
<b>General Residential Zone – Rules GRZ-Rx2</b>	Oppose in part	The RVA supports in principle the provision for greater height in the Residential Intensification Precinct. However, it considers a High Density Residential Zone should be provided in the District Plan with more lenient density standards.	<i>The RVA seeks the application of High Density Residential zoning to the Residential Intensification Precinct and more lenient density standards compared to the MDRS.</i>
<b>General Residential Zone – Rules GRZ-Rx5 – GRZ-Rx7</b>	Support in part / New rule sought	The RVA supports the provision for new buildings and structures, and additions or alterations to buildings and structures as a restricted discretionary activity under Rules GRZ-Rx5 – GRZ-	<i>The RVA seek that GRZ-Rx5 – GRZ-Rx7 are amended to exclude retirement villages and instead a bespoke rule for the construction / establishment of retirement village buildings is included in the District Plan with a set of focused matters of discretion that are applicable to</i>

Provisions	Submission Position	Reason for Submission	Relief Sought
		<p>Rx7 when not complying with one or more standards.</p> <p>However, the RVA considers that the construction of retirement villages should have focused matters of discretion (so to provide for and acknowledge the differences that retirement villages have from other residential activities).</p> <p>As detailed further in response to GRZ-R19, the RVA considers that retirement villages as an activity should be a permitted activity, and that it should instead only be the retirement village building(s) that is assessed as a restricted discretionary activity.</p> <p>When considering the matters of discretion that are currently applicable to retirement villages under GRZ-Rx5 – GRZ-Rx7, those matters include matters contained in the Residential Design Guide that make no specific reference to retirement villages, with no guidance provided as to why the requirements that are applicable to non-retirement village activities apply in the same manner to retirement villages (despite retirement villages being a unique activity with substantially differing functional and operational needs).</p> <p>The RVA considers the matters of discretion applicable to retirement villages need to appropriately provide for / support the efficient use of larger sites for retirement villages, and the</p>	<p><i>retirement villages. This regime will provide for and acknowledge the differences that retirement villages have from other residential activities:</i></p> <p><b><u>GRZ-RX Construction or alteration of or addition to any building or other structure for a retirement village</u></b></p> <p><b><u>Notification</u></b></p> <p><u>Public notification of an application for resource consent under this Rule is precluded.</u></p> <p><u>Limited notification of an application for resource consent under this Rule that complies with standards GRZ-Rx1.2 – GRZ-Rx1.5 is precluded.</u></p> <p><u>Restricted Discretionary Activity</u></p> <p><b><u>Matters of Discretion</u></b></p> <ol style="list-style-type: none"> <li><u>1. The effects resulting from the exceedance of any infringed GRZ-Rx1 Standards;</u></li> <li><u>2. The effects of the retirement village on the safety of adjacent streets or public open spaces;</u></li> <li><u>3. The effects arising from the quality of the interface between the retirement village and adjacent streets or public open spaces;</u></li> <li><u>4. The extent to which articulation, modulation and materiality addresses adverse visual dominance effects associated with building length;</u></li> <li><u>5. When assessing the matters in 1 – 4, consider:</u></li> </ol>

Provisions	Submission Position	Reason for Submission	Relief Sought
		<p>functional and operational needs of the retirement village.</p> <p>The RVA considers that internal amenity standards applicable to retirement villages should be limited to those controls / standards necessary or appropriate for retirement villages.</p> <p>The RVA supports GRZ-Rx5 being precluded from being publicly notified, but in accordance with Schedule 3A (5)(2) of the Act consider that a retirement village that is compliant with the relevant standards should also be precluded from limited notification.</p>	<p>a. <u>The need to provide for efficient use of larger sites; and</u></p> <p>b. <u>The functional and operational needs of the retirement village.</u></p> <p>6. <u>The positive effects of the construction, development and use of the retirement village.</u></p> <p><u>For clarity, no other rules or matters of discretion relating to the effects of density apply to buildings for a retirement village.</u></p>
<b>General Residential Zone – Rule GRZ-R19</b>	Oppose	As set out above, the RVA considers that retirement villages as a land use activity should be classified as a permitted activity under its own rule – with the construction / establishment of retirement villages being a restricted discretionary activity.	<i>The RVA seeks to exclude retirement villages from GRZ-R19, with its provision as a land use activity provided for under the new rule proposed in response to GRZ-R4 above.</i>
<b>Local Centre Zone – Policy LCZ-P3</b>	Support in part	The RVA supports the recognition that local and on-site amenity values will develop and change over time in response to the diverse and changing needs of people, communities and future generations in line with the NPSUD. It seeks the deletion of the direction for amenity values to be “maintained and enhanced” as it is inconsistent with that recognition.	<i>Amend LCZ-P3 to delete the direction for amenity values to be “maintained and enhanced”.</i>

Provisions	Submission Position	Reason for Submission	Relief Sought
<b>Local Centre Zone – Policy LCZ-P5</b>	Oppose in part	<p>The RVA supports LCZ-P5 and its provision for mixed use development, including residential activities, which enhance the viability and vitality of the Centre.</p> <p>The RVA opposes the requirement for the amenity to be in accordance with the Centres Design Guide. The Guide should not be applicable to retirement villages, noting that the design guide has been developed for standard residential developments and is not fit-for-purpose for retirement villages.</p> <p>Further, the RVA considers the restriction on development requiring a high level of amenity for residents, businesses and visitors to be achieved before the development is enabled is contrary to the MDRS direction to “encourage” high quality development.</p>	<p><i>The RVA seeks to amend LCZ-P5 as follows:</i></p> <p><i>Mixed use development, including residential activities, will be enabled in centres to enhance the viability and vitality of the centre where a high level of amenity for residents, businesses and visitors is <u>encouraged</u>.</i>  <del><i>achieved in accordance with the Centres Design Guide in Appendix x2.</i></del></p>
<b>Local Centre Zone – Policy LCZ-P6</b>	Oppose	<p>The RVA opposes the requirement to apply the Centres Design Guide. As set out above, the Centres Design Guide makes no specific reference to retirement villages, and there is no guidance provided as to why the requirements that are applicable to non-retirement village activities apply in the same manner to retirement villages (despite retirement villages being a unique activity with substantially differing functional and operational needs).</p>	<p><i>The RVA seeks the reference to the Centres Design Guide is excluded in relation to retirement villages.</i></p> <p><i>Replace “up to” with “at least”.</i></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
		The RVA also seeks amendments for consistency with Policy 3 NPSUD.	
<b>Local Centre Zone – Policies</b>	New policies sought	The RVA considers policy support for retirement villages in the Local Centre Zone is required as set out in the submission above.	<p><i>The RVA seeks the following policies:</i></p> <p><b><u>LCZ-PX Provisions of housing for an ageing population</u></b></p> <ol style="list-style-type: none"> <li>1. <u>Provide for a diverse range of housing and care options that are suitable for the particular needs and characteristics of older persons in the Local Centre Zone, such as retirement villages.</u></li> <li>2. <u>Recognise the functional and operational needs of retirement villages, including that they:</u> <ol style="list-style-type: none"> <li>a. <u>May require greater density than the planned urban built character to enable efficient provision of services.</u></li> <li>b. <u>Have unique layout and internal amenity needs to cater for the requirements of residents as they age.</u></li> </ol> </li> </ol> <p><b><u>LCZ-PX Larger sites</u></b></p> <p><u>Recognise the intensification opportunities provided by larger sites within the Local Centre Zone by provided for more efficient use of those sites.</u></p> <p><b><u>LCZ-PX Changing communities</u></b></p> <p><u>To provide for the diverse and changing residential needs of communities, recognise that the existing character and amenity of the Local Centre Zone will</u></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
			<u>change over time to enable a variety of housing types with a mix of densities.</u>
<b>Local Centre Zone – Rule LCZ-R6</b>  <b>Rule LCZ-R12</b>	Support in part / New rule sought	<p>The RVA supports LCZ-R6 in principle, and the permitting of the construction or alteration of or addition to any building or other structure when complying with the relevant standards (with infringement of any standards resulting in a restricted discretionary activity status under Rule LCZ-R12 or a discretionary activity status under Rule LCZ-R16). The RVA considers amendments to the standards are however required, in line with the submission on GRZ-Rx1 above.</p> <p>The RVA considers however that the construction of a retirement village should be a restricted discretionary activity under a specific retirement village rule, and that in addition to the matters of discretion of any infringed standard, the construction of retirement villages should have their own set of focused matters of discretion (so to provide for and acknowledge the differences that retirement villages have from other residential activities).</p> <p>The RVA opposes the application of the Centres Design Guide as a matter of discretion.</p> <p>The RVA considers the matters of discretion applicable to retirement villages need to appropriately provide for / support the efficient use of larger sites for retirement villages, and the</p>	<p><i>The RVA seek that LCZ-R6 is amended to align the standards with the relief sought on GRZ-Rx1 above.</i></p> <p><i>For any retirement village that breaches those standards, the RVA seeks a bespoke rule for the construction or alteration of or addition to any building or structure of a retirement village is included in the District Plan as follows, with a set of focused matters of discretion that are applicable to retirement villages:</i></p> <p><b><u>LCZ-RX Construction or alteration of or addition to any building or other structure for a retirement village</u></b></p> <p><b><u>Restricted Discretionary Activity</u></b></p> <p><b><u>Notification</u></b></p> <p><u>Public notification of an application for resource consent under this Rule is precluded.</u></p> <p><u>Limited notification of an application for resource consent under this Rule that complies with standards LCZ-R6.1 – LCZ-R6.3 is precluded.</u></p> <p><b><u>Matters of Discretion</u></b></p> <p><u>1. The effects of any non-compliance with any infringed LCZ-R6 Standards;</u></p> <p><u>2. The effects of the retirement village on the safety of adjacent streets or public open spaces;</u></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
		functional and operational needs of the retirement village.	<p><u>3. The effects arising from the quality of the interface between the retirement village and adjacent streets or public open spaces;</u></p> <p><u>5. When assessing the matters in 1 – 3, consider:</u></p> <p><u>a. The need to provide for efficient use of larger sites; and</u></p> <p><u>b. The functional and operational needs of the retirement village.</u></p> <p><u>6. The positive effects of the construction, development and use of the retirement village.</u></p> <p><u>For clarity, no other rules or matters of discretion relating to the effects of density apply to buildings for a retirement village.</u></p>
<b>Local Centre Zone – Rules</b>	New rule sought	The RVA considers that the Local Centre Zone should provide for retirement village activities as a permitted activity (with the construction of the retirement village being a restricted discretionary activity). A permitted activity status recognises that retirement villages provide substantial benefit including enabling older people to remain in familiar community environments for longer (close to family and support networks), whilst also freeing up a number of dwellings located in surrounding suburbs. Such a rule will be consistent with the	<p><i>The RVA seeks that a new rule is inserted in the Local Centre Zone that provides for retirement villages as permitted activities.</i></p> <p><b><u>LCZ-RX</u></b> Retirement village</p> <p><u>Permitted Activity</u></p> <p><b><u>Standards</u></b></p> <p><u>N/A</u></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
		broader permitted rule for residential activities – TCZ-P5.	
<b>Mixed Use Zone – Policy MUZ-P4</b>	Support in part	The RVA supports the recognition that local and on-site amenity values will develop and change over time in response to the diverse and changing needs of people, communities and future generations in line with the NPSUD. It seeks the deletion of the direction for amenity values to be “maintained and enhanced” as it is inconsistent with that recognition.	<i>Amend MUZ-P4 to delete the direction for amenity values to be “maintained and enhanced”.</i>
<b>Mixed Use Zone – Policy MUZ-P6</b>	Oppose in part	<p>The RVA supports MUZ-P6 and its provision for mixed use development, including residential activities, which enhance the viability and vitality of the Centre.</p> <p>The RVA opposes the requirement for the amenity to be in accordance with the Centres Design Guide. The Guide should not be applicable to retirement villages, noting that the design guide has been developed for standard residential developments and is not fit-for-purpose for retirement villages.</p> <p>Further, the RVA considers the restriction on development requiring a high level of amenity for residents, businesses and visitors to be achieved before the development is enabled is contrary to the MDRS direction to “encourage” high quality development.</p>	<p><i>The RVA seeks to amend MUZ-P5 as follows:</i></p> <p><i>Mixed use development, including residential activities, will be enabled in centres to enhance the viability and vitality of the centre where a high level of amenity for residents, businesses and visitors is <u>encouraged</u>.</i></p> <p><i><del>achieved in accordance with the Centres Design Guide in Appendix x2.</del></i></p>



Provisions	Submission Position	Reason for Submission	Relief Sought
<b>Mixed Use Zone – Policy MUZ-P7</b>	Oppose in part	<p>The RVA consider however that the application of the Centres Design Guide to achieve this should not be applicable to retirement villages, noting that the design guide has been developed for standard residential developments and is not fit-for-purpose for retirement villages.</p> <p>The RVA also seeks amendments for consistency with Policy 3 NPSUD.</p>	<p><i>The RVA seeks to amend MUZ-P7 to remove reference to the Centres Design Guide.</i></p> <p><i>Replace "up to" with "at least".</i></p>
<b>Mixed Use Zone – Policies</b>	New policies sought	The RVA considers policy support for retirement villages in the Mixed Use Zone is required as set out in the submission above.	<p><i>The RVA seeks the following policies:</i></p> <p><b><u>MUZ-PX Provisions of housing for an ageing population</u></b></p> <ol style="list-style-type: none"> <li>1. <u>Provide for a diverse range of housing and care options that are suitable for the particular needs and characteristics of older persons in the Mixed Use Zone, such as retirement villages.</u></li> <li>2. <u>Recognise the functional and operational needs of retirement villages, including that they:</u> <ol style="list-style-type: none"> <li>a. <u>May require greater density than the planned urban built character to enable efficient provision of services.</u></li> <li>b. <u>Have unique layout and internal amenity needs to cater for the requirements of residents as they age.</u></li> </ol> </li> </ol> <p><b><u>MUZ-PX Larger sites</u></b></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
			<p><u>Recognise the intensification opportunities provided by larger sites within the Mixed Use Zone by provided for more efficient use of those sites.</u></p> <p><b><u>MUZ-PX Changing communities</u></b></p> <p><u>To provide for the diverse and changing residential needs of communities, recognise that the existing character and amenity of the Mixed Use Zone will change over time to enable a variety of housing types with a mix of densities.</u></p>
<b>Mixed Use Zone – Rule MUZ-R6</b>	Support in part	<p>The RVA supports MUZ-R6 in principle, and the permitting of the construction or alteration of or addition to any building or other structure when complying with the relevant standards (with infringement of any standards resulting in a restricted discretionary activity status under Rule MUZ-R13 or a discretionary activity status under Rule MUZ-R14). The RVA considers amendments to the standards are however required, in line with the submission on GRZ-Rx1 above.</p> <p>The RVA considers however that the construction of a retirement villages should be a restricted discretionary activity under a specific retirement village rule, and that in addition to the matters of discretion of any infringed standard, the construction of retirement villages should have their own set of focused matters of discretion (so to provide for and acknowledge the differences that</p>	<p><i>The RVA seek that MUZ-R6 is amended to align the standards with the relief sought on GRZ-Rx1 above.</i></p> <p><i>For any retirement village that breaches those standards, the RVA seeks a bespoke rule for the construction or alteration of or addition to any building or structure of a retirement village is included in the District Plan, as follows, with a set of focused matters of discretion that are applicable to retirement villages. This relief will provide for and acknowledge the differences that retirement villages have from other residential activities:</i></p> <p><b><u>MUZ-RX Construction or alteration of or addition to any building or other structure for a retirement village</u></b></p> <p><u>Restricted Discretionary Activity</u></p> <p><b><u>Notification</u></b></p> <p><u>Public notification of an application for resource consent under this Rule is precluded.</u></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
		<p>retirement villages have from other residential activities).</p> <p>The RVA opposes the application of the Centres Design Guide as a matter of discretion.</p> <p>The RVA considers the matters of discretion applicable to retirement villages need to appropriately provide for / support the efficient use of larger sites for retirement villages, and the functional and operational needs of the retirement village.</p>	<p><u>Limited notification of an application for resource consent under this Rule that complies with standards MUZ-R6.1 and MUZ-R6.2 is precluded.</u></p> <p><b><u>Matters of Discretion</u></b></p> <p><u>1. The effects of any non-compliance with any infringed MUZ-R6 Standards;</u></p> <p><u>2. The effects of the retirement village on the safety of adjacent streets or public open spaces;</u></p> <p><u>3. The effects arising from the quality of the interface between the retirement village and adjacent streets or public open spaces;</u></p> <p><u>5. When assessing the matters in 1 – 3, consider:</u></p> <p><u>a. The need to provide for efficient use of larger sites; and</u></p> <p><u>b. The functional and operational needs of the retirement village.</u></p> <p><u>6. The positive effects of the construction, development and use of the retirement village.</u></p> <p><u>For clarity, no other rules or matters of discretion relating to the effects of density apply to buildings for a retirement village.</u></p>
<b>Mixed Use Zone - Rules</b>	New rule sought	The RVA considers that the Mixed Use Zone should provide for retirement village activities as a permitted activity (with the construction of the retirement village being a restricted discretionary	<i>The RVA seeks that a new rule is inserted in the Mixed Use Zone that provides for retirement villages as permitted activities.</i>

Provisions	Submission Position	Reason for Submission	Relief Sought
		activity), recognising that retirement villages provide substantial benefit including enabling older people to remain in familiar community environments for longer (close to family and support networks), whilst also freeing up a number of dwellings located in surrounding suburbs. Such a rule will be consistent with the broader permitted rule for residential activities – MCZ-P5.	<b>MUZ-RX Retirement village</b> <u>Permitted Activity</u> <b>Standards</b> <u>N/A</u>
<b>Town Centre Zone – Policy TCZ-P3</b>	Support in part	The RVA supports the recognition that local and on-site amenity values will develop and change over time in response to the diverse and changing needs of people, communities and future generations in line with the NPSUD. It seeks the deletion of the direction for amenity values to be “maintained and enhanced” as it is inconsistent with that recognition.	<i>Amend TCZ-P3 to delete the direction for amenity values to be “maintained and enhanced”.</i>
<b>Town Centre Zone – Policy TCZ-P5</b>	Oppose in part	<p>The RVA supports TCZ-P5 and its provision for mixed use development, including residential activities, which enhance the viability and vitality of the Centre.</p> <p>The RVA opposes the requirement for the amenity to be in accordance with the Centres Design Guide should not be applicable to retirement villages, noting that the design guide has been developed for standard residential developments and is not fit-for-purpose for retirement villages.</p>	<p><i>The RVA seeks to amend TCZ-P5 as follows:</i></p> <p><i>Mixed use development, including residential activities, will be enabled in centres to enhance the viability and vitality of the centre where a high level of amenity for residents, businesses and visitors is <u>encouraged</u>.</i></p> <p><i><del>achieved in accordance with the Centres Design Guide in Appendix x2.</del></i></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
		Further, the RVA considers the restriction on development requiring a high level of amenity for residents, businesses and visitors to be achieved before the development is enabled is contrary to the MDRS direction to “encourage” high quality development.	
<b>Town Centre Zone – Policy TCZ-P6</b>	Oppose in part	<p>The RVA opposes the requirement to apply the Centres Design Guide. As set out above, the Centres Design Guide makes no specific reference to retirement villages, and there is no guidance provided as to why the requirements that are applicable to non-retirement village activities apply in the same manner to retirement villages (despite retirement villages being a unique activity with substantially differing functional and operational needs).</p> <p>The RVA also seeks amendments for consistency with Policy 3 NPSUD.</p>	<p><i>The RVA seeks the reference to the Centres Design Guide is excluded in relation to retirement villages.</i></p> <p><i>Replace “up to” with “at least”.</i></p>
<b>Town Centre Zone – Policies</b>	New policies sought	The RVA considers policy support for retirement villages in the Town Centre Zone is required as set out in the submission above.	<p><i>The RVA seeks the following policies:</i></p> <p><b><u>TCZ-PX Provisions of housing for an ageing population</u></b></p> <ol style="list-style-type: none"> <li>1. <u>Provide for a diverse range of housing and care options that are suitable for the particular needs and characteristics of older persons in the Town Centre Zone, such as retirement villages.</u></li> </ol>

Provisions	Submission Position	Reason for Submission	Relief Sought
			<p>2. <u>Recognise the functional and operational needs of retirement villages, including that they:</u></p> <ul style="list-style-type: none"> <li>a. <u>May require greater density than the planned urban built character to enable efficient provision of services.</u></li> <li>b. <u>Have unique layout and internal amenity needs to cater for the requirements of residents as they age.</u></li> </ul> <p><b><u>TCZ-PX Larger sites</u></b></p> <p><u>Recognise the intensification opportunities provided by larger sites within the Town Centre Zone by provided for more efficient use of those sites.</u></p> <p><b><u>TCZ-PX Changing communities</u></b></p> <p>To provide for the diverse and changing residential needs of communities, recognise that the existing character and amenity of the Town Centre Zone will change over time to enable a variety of housing types with a mix of densities.</p>
<p><b>Town Centre Zone – Rule TCZ-R6 and R7</b></p> <p><b>Rule TCZ-R11</b></p> <p><b>Rule TCZ-R14</b></p>	Support in part	The RVA supports TCZ-R6 and R7 in principle, and the permitting of the construction or alteration of or addition to any building or other structure when complying with the relevant standards (with infringement of any standards resulting in a restricted discretionary activity status under Rule TCZ-R11 or a discretionary activity status under Rule TCZ-R14). The RVA considers amendments to	<p><i>The RVA seek that TCZ-R6 is amended to align the standards with the relief sought on GRZ-Rx1 above</i></p> <p><i>For any retirement village that breaches those standards, the RVA seeks a bespoke rule for the construction or alteration of or addition to any building or structure of a retirement village is included in the District Plan as follows, with a set of focused matters of discretion that are applicable to retirement villages:</i></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
		<p>the standards are however required, in line with the submission on GRZ-Rx1 above.</p> <p>The RVA considers however that the construction of a retirement village should be a restricted discretionary activity under a specific retirement village rule, and that in addition to the matters of discretion of any infringed standard, the construction of retirement villages should have their own set of focused matters of discretion (so to provide for and acknowledge the differences that retirement villages have from other residential activities).</p> <p>The RVA opposes the application of the Centres Design Guide as a matter of discretion.</p> <p>The RVA considers the matters of discretion applicable to retirement villages need to appropriately provide for / support the efficient use of larger sites for retirement villages, and the functional and operational needs of the retirement village.</p>	<p><b><u>TCZ-RX</u></b> Construction or alteration of or addition to any building or other structure for a retirement village</p> <p><u>Restricted Discretionary Activity</u></p> <p><b><u>Notification</u></b></p> <p><u>Public notification of an application for resource consent under this Rule is precluded.</u></p> <p><u>Limited notification of an application for resource consent under this Rule that complies with standards TCZ-R6.1 - TCZ-R6.3 is precluded.</u></p> <p><b><u>Matters of Discretion</u></b></p> <p><u>1. The matters of discretion of any infringed TCZ-R6 Standards;</u></p> <p><u>2. The effects of the retirement village on the safety of adjacent streets or public open spaces;</u></p> <p><u>3. The effects arising from the quality of the interface between the retirement village and adjacent streets or public open spaces;</u></p> <p><u>5. When assessing the matters in 1 – 3, consider:</u></p> <p><u>a. The need to provide for efficient use of larger sites; and</u></p> <p><u>b. The functional and operational needs of the retirement village.</u></p> <p><u>6. The positive effects of the construction, development and use of the retirement village.</u></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
			<u>For clarity, no other rules or matters of discretion relating to the effects of density apply to buildings for a retirement village.</u>
<b>Town Centre Zone - Rules</b>	New rule sought	The RVA considers the Town Centre Zone should provide for retirement village activities as a permitted activity (with the construction of the retirement village being a restricted discretionary activity), recognising that retirement villages provide substantial benefit including enabling older people to remain in familiar community environments for longer (close to family and support networks), whilst also freeing up a number of dwellings located in surrounding suburbs. Such a rule will be consistent with the broader permitted rule for residential activities – LCZ-P5.	<p><i>The RVA seeks that a new rule is inserted in the Town Centre Zone that provides for retirement villages as permitted activities.</i></p> <p><b><u>TCZ-RX</u></b>     Retirement village</p> <p><u>Permitted Activity</u></p> <p><b><u>Standards</u></b></p> <p><u>N/A</u></p>
<b>Metropolitan Centre Zone – Policy MCZ-P5</b>	Support in part	The RVA supports the recognition that local and on-site amenity values will develop and change over time in response to the diverse and changing needs of people, communities and future generations in line with the NPSUD. It seeks the deletion of the direction for amenity values to be “maintained and enhanced” as it is inconsistent with that recognition.	<i>Amend MCZ-P5 to delete the direction for amenity values to be “maintained and enhanced”.</i>
<b>Metropolitan Centre Zone – Policy MCZ-P7</b>	Oppose in part	The RVA supports MCZ-P7 and its provision for mixed use development, including residential activities, which enhance the viability and vitality of the Centre.	<p><i>The RVA seeks to amend MCZ-P7 as follows:</i></p> <p><i>Mixed use development, including residential activities, will be enabled in centres to enhance the viability and vitality of the centre where a high level of amenity for</i></p>



Provisions	Submission Position	Reason for Submission	Relief Sought
		<p>The RVA opposes the requirement for the amenity to be in accordance with the Centres Design Guide should not be applicable to retirement villages, noting that the design guide has been developed for standard residential developments and is not fit-for-purpose for retirement villages.</p> <p>Further, the RVA considers the restriction on development requiring a high level of amenity for residents, businesses and visitors to be achieved before the development is enabled is contrary to the MDRS direction to “encourage” high quality development.</p>	<p><i>residents, businesses and visitors is <u>encouraged</u>. <del>achieved in accordance with the Centres Design Guide in Appendix x2.</del></i></p>
<b>Metropolitan Centre Zone – Policy MCZ-P8</b>	Oppose in part	<p>The RVA opposes the requirement to apply the Centres Design Guide. As set out above, the Centres Design Guide makes no specific reference to retirement villages, and there is no guidance provided as to why the requirements that are applicable to non-retirement village activities apply in the same manner to retirement villages (despite retirement villages being a unique activity with substantially differing functional and operational needs).</p> <p>The RVA also seeks amendments for consistency with Policy 3 NPSUD.</p>	<p><i>The RVA seeks the reference to the Centres Design Guide is excluded in relation to retirement villages.</i></p> <p><i>Replace “up to” with “at least”.</i></p>
<b>Metropolitan Centre Zone – Policies</b>	New policies sought	The RVA considers policy support for retirement villages in the Metropolitan Centre Zone is required as set out in the submission above.	<i>The RVA seeks the following policies:</i>

Provisions	Submission Position	Reason for Submission	Relief Sought
			<p><b><u>MCZ-PX Provisions of housing for an ageing population</u></b></p> <ol style="list-style-type: none"> <li>1. <u>Provide for a diverse range of housing and care options that are suitable for the particular needs and characteristics of older persons in the Metropolitan Centre Zone, such as retirement villages.</u></li> <li>2. <u>Recognise the functional and operational needs of retirement villages, including that they:</u> <ol style="list-style-type: none"> <li>a. <u>May require greater density than the planned urban built character to enable efficient provision of services.</u></li> <li>b. <u>Have unique layout and internal amenity needs to cater for the requirements of residents as they age.</u></li> </ol> </li> </ol> <p><b><u>MCZ-PX Larger sites</u></b></p> <p><u>Recognise the intensification opportunities provided by larger sites within the Metropolitan Centre Zone by provided for more efficient use of those sites.</u></p> <p><b><u>MCZ-PX Changing communities</u></b></p> <p>To provide for the diverse and changing residential needs of communities, recognise that the existing character and amenity of the Metropolitan Centre Zone will change over time to enable a variety of housing types with a mix of densities.</p>

Provisions	Submission Position	Reason for Submission	Relief Sought
<b>Metropolitan Centre Zone – Rule MCZ-R7</b> <b>Rule MCZ-R11</b> <b>Rule MCZ-R13</b> <b>Rule MCZ-R17</b>	Support in part / New rule sought	<p>The RVA supports MCZ-R7 in principle, and the permitting of the construction or alteration of or addition to any building or other structure when complying with the relevant standards (with infringement of any standards resulting in a controlled activity status under MCZ-R11, a restricted discretionary activity status under Rule MCZ-R13 or a discretionary activity status under Rule MCZ-R17). The RVA considers amendments to the standards are however required, in line with the submission on GRZ-Rx1 above.</p> <p>The RVA considers however that the construction of a retirement villages should be a restricted discretionary activity under a specific retirement village rule, and that in addition to the matters of discretion of any infringed standard, the construction of retirement villages should have their own set of focused matters of discretion (so to provide for and acknowledge the differences that retirement villages have from other residential activities).</p> <p>The RVA opposes the application of the Centres Design Guide as a matter of discretion.</p> <p>The RVA considers the matters of discretion applicable to retirement villages need to appropriately provide for / support the efficient use of larger sites for retirement villages, and the</p>	<p><i>The RVA seeks that MCZ-R7 is amended to align the standards with the relief sought on GRZ-Rx1 above</i></p> <p><i>For any retirement village that breaches those standards, the RVA seeks a bespoke rule for the construction or alteration of or addition to any building or structure of a retirement village is included in the District Plan as follows, with a set of focused matters of discretion that are applicable to retirement villages. This relief is to provide for and acknowledge the differences that retirement villages have from other residential activities:</i></p> <p><b><u>MCZ-RX Construction or alteration of or addition to any building or other structure for a retirement village</u></b></p> <p><b><u>Restricted Discretionary Activity</u></b></p> <p><b><u>Notification</u></b></p> <p><u>Public notification of an application for resource consent under this Rule is precluded.</u></p> <p><u>Limited notification of an application for resource consent under this Rule that complies with standards MCZ-R7.1 and MCZ-R7.2 is precluded.</u></p> <p><b><u>Matters of Discretion</u></b></p> <p><u>1. The matters of discretion of any infringed MCZ-R7 Standards;</u></p> <p><u>2. The effects of the retirement village on the safety of adjacent streets or public open spaces;</u></p>

Provisions	Submission Position	Reason for Submission	Relief Sought
		functional and operational needs of the retirement village.	<p><u>3. The effects arising from the quality of the interface between the retirement village and adjacent streets or public open spaces;</u></p> <p><u>5. When assessing the matters in 1 – 3, consider:</u></p> <p><u>a. The need to provide for efficient use of larger sites; and</u></p> <p><u>b. The functional and operational needs of the retirement village.</u></p> <p><u>6. The positive effects of the construction, development and use of the retirement village.</u></p> <p><u>For clarity, no other rules or matters of discretion relating to the effects of density apply to buildings for a retirement village.</u></p>
<b>Metropolitan Centre Zone - Rules</b>	New rule sought	The RVA considers that the Metropolitan Centre Zone should provide for retirement village activities as a permitted activity (with the construction of the retirement village being a restricted discretionary activity), recognising that retirement villages provide substantial benefit including enabling older people to remain in familiar community environments for longer (close to family and support networks), whilst also freeing up a number of dwellings located in surrounding suburbs. Such a rule will be consistent with the broader permitted rule for residential activities – MCZ-R3.	<p><i>The RVA seeks that a new rule is inserted in the Metropolitan Centre Zone that provides for retirement villages as permitted activities.</i></p> <p><b><u>MCZ-RX Retirement village</u></b></p> <p><i><u>Permitted Activity</u></i></p> <p><b><u>Standards</u></b></p> <p><u>N/A</u></p>

**From:** [Marika Williams](#)  
**To:** [Mailbox - District Planning](#)  
**Cc:** [Luke Hinchey](#); [Nicola de Wit](#)  
**Subject:** RVA - submission on PC2 to the Operative Kāpiti Coast District Plan  
**Date:** Tuesday, 27 September 2022 2:36:26 pm  
**Attachments:** [RVA - submission on PC2 Intensification Kapiti Coast District Plan.pdf](#)  
[Form 5 - RVA.pdf](#)

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Good afternoon

Please find **attached** a submission from the Retirement Villages Association of New Zealand Incorporated on Plan Change 2 to the Operative Kāpiti Coast District Plan, and the accompanying submission form.

Kind regards

Marika

MARIKA WILLIAMS (she/her)

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