

# 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 Ryman Healthcare Limited

**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@chapmantrip.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 checked="" 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:

196





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:** Ryman Healthcare Limited (*Ryman*)

***Introduction***

- 1 This is a submission on Council's proposed amendments to the Kāpiti Coast District Plan (*District Plan*): Proposed Plan Change 2: Intensification (*PC2*).
- 2 Ryman could not gain an advantage in trade competition through this submission.
- 3 Ryman supports in full the Retirement Villages Association of New Zealand Incorporated (*RVA*) submission on *PC2*. This submission provides additional context to Ryman's villages and its interest in the proposal.
- 4 The submission covers:
  - 4.1 An introduction to Ryman, its villages and its residents; and
  - 4.2 Ryman's position on *PC2*.

***Ryman's approach***

- 5 Ryman is considered to be a pioneer in many aspects of the healthcare industry – including retirement village design, standards of care, and staff education. It believes that a quality site, living environment, amenities and the best care maximises the quality of life for our residents. Ryman is passionately committed to providing the best environment and care for our residents. Ryman is not a developer. It is a resident-focused operator of retirement villages. Ryman has a long term interest in its villages and its residents.

***The ageing demographic***

- 6 Kāpiti's growing ageing population and the increasing demand for retirement villages is addressed in the *RVA*'s submission on *PC2*, and that is adopted by Ryman.
- 7 Ryman's own research confirms that good quality housing and sophisticated care for the older population is significantly undersupplied in many parts of the country, including Kāpiti. Kāpiti's ageing population is facing a significant shortage in appropriate accommodation and care options, which allow them to "age in place" as their health and lifestyle requirements change over time. This is because appropriate sites in good locations are incredibly scarce.

***Ryman's residents***

- 8 All of Ryman's residents – both retirement unit and aged care room residents – are much less active and mobile than the 65+ population generally as well as the wider population. Ryman's retirement unit residents are early 80s on move-in and its aged care residents are

mid-late 80s on move-in. Across all of Ryman's villages, the average age of retirement unit residents is 82.1 years and the average age of aged care residents is 86.7 years.

***Ryman villages' amenities and layout needs***

- 9 To provide for the specific needs of its residents, Ryman provides extensive on-site community amenities, including entertainment activities, recreational amenities, small shops, bar and restaurant amenities, communal sitting areas, and large, attractively landscaped areas.
- 10 Because of the comprehensive care nature of Ryman's villages, all of the communal amenities and care rooms need to be located in the Village Centre to allow for safe and convenient access between these areas. This operational requirement results in a density and layout that differs from a typical residential development. However, Ryman's retirement villages are integrated developments, which often creates opportunities to achieve higher quality residential outcomes compared to typical residential developments.

***Ryman's position on PC2***

- 11 Ryman adopts the RVA's submission on PC2. In addition, Ryman wishes to emphasise that PC2 will have a significant impact on the provision of housing and care for Kāpiti's growing ageing population. There is a real risk that the proposed changes will delay necessary retirement and aged care accommodation in the region.

***Relief sought***

- 12 Ryman seeks the relief sought by the RVA in its submission on PC2.
- 13 Ryman wishes to be heard in support of this submission.
- 14 If others make a similar submission, Ryman will consider presenting a joint case with them at a hearing.

**Matthew Brown**

NZ Development Manager

Ryman Healthcare Limited

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Address for service of submitter:

Ryman Healthcare Limited

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**From:** [Marika Williams](#)  
**To:** [Mailbox - District Planning](#)  
**Cc:** [Luke Hinchey](#); [Nicola de Wit](#)  
**Subject:** Ryman Healthcare - submission on PC2 to the Operative Kāpiti Coast District Plan  
**Date:** Tuesday, 27 September 2022 2:34:35 pm  
**Attachments:** [Ryman Healthcare Limited - submission on PC2 Intensification Kapiti Coast District Plan.pdf](#)  
[Form 5 - Ryman.pdf](#)

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Good afternoon

Please find **attached** a submission from Ryman Healthcare Limited on Plan Change 2 to the Operative Kāpiti Coast District Plan, and the accompanying submission form.

Kind regards

Marika

MARIKA WILLIAMS (she/her)

SOLICITOR

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