

Before the Independent Hearings Panel
Kāpiti Coast District Council

under: the Resource Management Act 1991

in the matter of: Submissions and further submissions in relation to
Proposed Plan Change 2 to the Kāpiti Coast District Plan

and: **Retirement Villages Association of New Zealand
Incorporated**

Submitter 196

and: **Ryman Healthcare Limited**

Submitter 197

Memorandum of counsel on behalf of the **Retirement Villages
Association of New Zealand Incorporated** and **Ryman
Healthcare Limited**

Dated: 6 April 2023

Reference: Luke Hinchey (luke.hinchey@chapmantripp.com)
Alice Hall (alice.hall@chapmantripp.com)

chapmantripp.com
T +64 9 357 9000
F +64 9 357 9099

PO Box 2206
Auckland 1140
New Zealand

Auckland
Wellington
Christchurch



**MEMORANDUM OF COUNSEL ON BEHALF OF RYMAN
HEALTHCARE LIMITED AND THE RETIREMENT VILLAGES
ASSOCIATION OF NEW ZEALAND INCORPORATED**

- 1 This memorandum of counsel is provided on behalf of Ryman Healthcare Limited (*Ryman*)¹ and the Retirement Villages Association of New Zealand (*RVA*)² in response to the discussion at the hearing on 29 March 2023 regarding Ryman and the RVA's proposed regime.
- 2 The Panel requested that Ryman and the RVA provide:
 - 2.1 Further explanation as to how the RVA and Ryman's proposed planning regime manages the external effects of retirement villages;
 - 2.2 As an alternative, a 'standalone' retirement village specific policy; and
 - 2.3 Further comment on how the policy and rule framework for retirement villages would operate in commercial centre zones.
- 3 Ms Nicki Williams (Associate, Mitchell Daysh) has prepared a supplementary statement responding to these directions, filed herein. Ryman and the RVA agree with the new standalone retirement village specific policy proposed by Ms Williams.

Luke Hinchey / Alice Hall
Counsel for Ryman and the RVA
6 April 2023

¹ Submitter 197.

² Submitter 196.