

Before the Independent Hearings Panel
Hutt City Council

under: the Resource Management Act 1991

in the matter of: Submissions and further submissions in relation to Plan
Change 56 to the City of Lower Hutt District Plan

and: **Ryman Healthcare Limited**
(Submitter 204)

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

Dated: 19 April 2023

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SUMMARY STATEMENT OF MATTHEW BROWN ON BEHALF OF RYMAN HEALTHCARE LIMITED

- 1 My full name is Matthew Glen Brown. I am the General Manager Development NZ for Ryman Healthcare Limited (*Ryman*). I have prepared this statement to provide a brief overview of Ryman's interests in Plan Change 56 (*PC56*).
- 2 I acknowledge that the Panel will be familiar with Ryman's position from the Wellington Proposed District Plan Hearings. Many of the issues Ryman raised in the Wellington Stream 2 Hearing also apply to PC56.
- 3 For the purposes of the present hearing on PC56, I wish to draw the Panel's attention to our recent consenting experience in Karori, (which Commissioner McMahon will be very familiar with), and which I discuss in my evidence. I acknowledge the site and planning context was somewhat unique. However, our Karori experience highlights many of the key themes of the RVA's case. It helps provide a practical dimension to why Ryman and the RVA have sought a retirement village-specific regime in PC56.
- 4 I note it took us almost three years for consent to be granted for that Village. The primary reason for the delays in my view was that the planning context for Karori was unclear and did not encourage or enable housing development sufficiently. The Plan provisions did not expressly provide for retirement villages. The rules and assessment matters were also highly complex.
- 5 This lack of planning clarity manifests in a range of issues which complicate the consent process and make it very inefficient. For example, we, as applicant, need to carry a significant degree of consenting risk when purchasing these sites. In practice, to manage those risks we will commission significant and expensive assessments from multiple specialists. For Karori, Ryman engaged a second urban design expert to peer review our initial assessment, due to the extent of debate around urban design effects and the need to provide detailed commentary on the urban design guides applicable there. And, we undertook lengthy discussions with Council officers to socialise our designs and seek as much agreement as possible.
- 6 While we do consult with councils as a matter of course during consenting, our experience is that where the planning context is much clearer, these discussions can be much more focused and beneficial.
- 7 In cases where the planning regime for retirement villages is not clear, the relevant council tends to act very conservatively. They will ask for a lot of further information and conditions during the application processing stages. They are also more likely than not to want to notify the application to reduce their exposure to adverse community feedback and judicial review risks. For Karori, full public

notification was used. However, the key opposing submitters were the directly affected neighbours.

- 8 Where the Plan is unclear, submitters also tend to be surprised by retirement villages occurring in their neighbourhood, and oppose our activities as not being appropriate for the area. Ryman received a number of public submissions on the Karori Village, which argued that the outer residential zone was not an appropriate location for a large scale Ryman village. Despite the number of public submissions, as noted, it was still only the directly affected neighbours who appeared at the application hearing. This was also despite Ryman taking a very conservative approach when designing the Village to meet the outcomes sought by the operative Plan. Some submitters also sought design changes which were simply not justified to manage effects, such as huge setbacks and reduced height well below the relevant development standards.
- 9 I also note Ryman's proposed Village in Karori was carefully designed to make use of a 'windfall site' – a large, residentially zoned and brownfield piece of land. These sites simply do not come up very often. They are a very rare resource in an existing urban area. Despite it being in an "outer residential zone" it made perfect sense to Ryman to use it as a retirement village. There was huge interest in the Village from local residents. I recall one couple that appeared at the hearing to support the proposal that had lived in Karori for 36 years. They emphasised the practical importance to them of 'ageing in place' - being able to remain in Karori, close to their family and friends, and where they could continue their current hobbies and other activities. One of the submitters recounted her granddaughter's emphatic statement that she would not visit often if she had to travel to the Kāpiti Coast to see her grandparents. These anecdotal accounts from older people are common for us as we plan and build new villages across New Zealand.
- 10 This experience of significant cost and delay in consenting a retirement village is not unique to Ryman or the Karori example. As a result, and in light of the intensification enabled by the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021, Ryman is engaging in the PC56 process to improve and streamline consent processes for retirement villages. This approach is intended to reduce delays and ultimately ensure the efficient delivery of housing for older people. However, we are not seeking to move away from an effects management approach. The regime we are putting forward focuses on the key effects that potentially arise, including positive effects.
- 11 Ryman agrees with and supports the key outcomes sought by the RVA, as previously set out by Ms Owens and to soon be expanded on by Mr Luke Hinchey, Professor Ngaire Kerse and Dr Phil Mitchell.

Matthew Brown

19 April 2023