

Before the Independent Hearings Panel  
Wellington City Council

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*under:* the Resource Management Act 1991 (*RMA*)

*in the matter of:* Submissions and further submissions in relation to the  
Wellington City Proposed District Plan

*and:* **Ryman Healthcare Limited**

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

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

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Dated: 31 March 2023

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**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*)<sup>1</sup> and the Retirement Villages Association of New Zealand (*RVA*)<sup>2</sup> in relation to the Wellington City Proposed District Plan.
- 2 To help understanding of their submissions, Ryman and the RVA would like to invite the Panel and Council Officers for the Wellington City Council to a site visit at a selection of the RVA's member villages in the District. The site visit would be accompanied by a representative for the RVA and would take approximately half a day. Transport would be arranged from a central pick up point. We are happy to arrange a time that best suits.
- 3 To provide some further context for this invitation, Ryman and the RVA are involved in hearing processes across all Tier 1 councils that are implementing the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.
- 4 As part of these processes, Ryman and the RVA are seeking a nationally consistent retirement village-specific framework. This framework seeks to largely incorporate the medium density residential standards. It also provides for a more nuanced approach to the development of retirement villages in the context of their unique functional and operational characteristics and different resident needs.
- 5 Some council officers (including Council Officers from Wellington City Council) appear to misunderstand the nature and features of retirement villages and their residents. Examples of these misunderstandings are that retirement villages are not residential and/or have significant adverse effects on neighbouring properties due to their larger scale and different internal layouts.

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<sup>1</sup> Submitter 346 and FS 128.

<sup>2</sup> Submitter 350 and FS 126.

- 6 Accordingly, Ryman and the RVA consider a site visit to see the layout and operation of RVA members' retirement villages first-hand will greatly assist. If the Panel or Council Officers wish to take up this opportunity, please let us know. A RVA representative will then get in touch regarding appropriate dates and times.

**Luke Hinchey / Alice Hall**

Counsel for Ryman and the RVA

31 March 2023