

Submission on Notified Proposal for Plan, Change or Variation

Clause 6 of Schedule 1, Resource Management Act 1991

To: Timaru District Council

Name of submitter:

Ryman Healthcare Limited

[State full name]

This is a submission on the following proposed plan or on a change proposed to the following plan or on the following proposed variation to a proposed plan or on the following proposed variation to a change to an existing plan) (the 'proposal'):

Proposed District Plan

[State the name of proposed or existing plan and (where applicable) change or variation].

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

[*Select one.]

~~I am/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.~~

[*Delete or strike through entire paragraph if you could not gain an advantage in trade competition through this submission.]

[†Select one.]

The specific provisions of the proposal that my submission relates to are: [Give details]

Please see attached submission

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

[If your submission relates to a proposed plan prepared or changed using the collaborative planning process, you must indicate the following:

- Where you consider that the proposed plan or change fails to give effect to a consensus position and therefore how it should be modified; or
- In the case that your submission addresses a point on which the collaborative group did not reach a consensus position, how that provision in the plan should be modified.]

Please see attached submission

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I seek the following decision from the local authority: *[Give precise details as this is the only part of your submission that will be summarised in the summary of decisions requested]*

Please see attached submission

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I wish or do not wish) † to be heard in support of my submission.

*[*In the case of a submission made on a proposed planning instrument that is subject to a streamlined planning process, you need only indicate whether you wish to be heard if the direction specifies that a hearing will be held.]*

[†Select one.]

***If others make a similar submission, I will consider presenting a joint case with them at a hearing.**

*[*Delete if you would not consider presenting a joint case.]*

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

[A signature is not required if you make your submission by electronic means]

Date 15/12/2022

Electronic address for service of submitter: alice.hall@chapmantripp.com / luke.hinchey@chapmantripp.com

Telephone: +64 9 357 2709

Postal address (or alternative method of service under s352 of the Act):

c/o Chapman Tripp, Level 34, 15 Customs Street West, PO Box 2206, Auckland 1024

Contact person: *[name and designation, if applicable]* Luke Hinchey, on behalf of Ryman

Note to person making submission

1. If you are making a submission to the Environmental Protection Authority, you should use form 16B. 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.
2. Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 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 specialist knowledge or skill to give expert advice on the matter.



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: Timaru District Council

Name of submitter: Ryman Healthcare Limited (*Ryman*)

Introduction

- 1 This is a submission on Timaru District Council's (*Council*) Proposed District Plan (*PDP*) on behalf of Ryman.
- 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 the PDP. 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 the PDP.

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 its 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 Timaru's growing ageing population and the increasing demand for retirement villages is addressed in the RVA's submission on the PDP, 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 the Timaru District. Timaru'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 facilities, small shops, bar and restaurant facilities, 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 the PDP

- 11 Ryman adopts the RVA's submission on the PDP. In addition, Ryman wishes to emphasise that the PDP could have a significant impact on the provision of housing and care for Timaru'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 the PDP.
- 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

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