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Resource Management Act 1991

Submission on Notified Proposed Plan Change to Central Otago District Plan

Clause 6 of Schedule 1, Resource Management Act 1991

(FORM 5)

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340

Details of submitter

Name: Ryman Healthcare Limited _____

Postal address: ___ c/- Chapman Tripp, Level 34, 15 Customs Street West, PO Box 2206, Auckland 1140
(Or alternative method of service under [section 352](#) of the Act)

Phone: +64 9 357 9286 _____

Email: Nicola.deWit@chapmantripp.com _____

Contact person: ___ Nicola de Wit, Chapman Tripp _____
(Name & designation, if applicable)

This is a submission on proposed Plan Change 19 to the Central Otago District Plan (the proposal).

I am / am not* a trade competitor for the purposes of [section 308B](#) of the Resource Management Act 1991 (*select one)

The specific provisions of the proposal that my submission relates to are:

(Give details, attach on separate page if necessary)

See attached submission. _____

This submission is:

(Attach on separate page if necessary) Include:

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views.

See attached submission. _____

I / We seek the following decision from the consent authority:

(Give precise details, including the general nature of any conditions sought)

See attached submission. _____

- **I support / oppose the application OR neither support nor oppose** *(select one)*
- **I wish / do not wish to be heard in support of this submission** *(select one)*
- ***I / We will consider presenting a joint case if others make a similar submission**
**Delete this paragraph if not applicable.*

In lodging this submission, I understand that my submission, including contact details, are considered public information, and will be made available and published as part of this process.



Signature

2 September 2022

Date

Submissions close at 4pm on Friday 2 September 2022

Submissions can be emailed to districtplan@codc.govt.nz

Note to person making submission:

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.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that a 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 specialised 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: Central Otago District Council

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

Introduction

- 1 This is a submission on Central Otago District Council's (*Council*) Proposed Plan Change 19 (*PC19*) to the Central Otago District Plan (*CODP*) 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 PC19. 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 PC19.

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 Central Otago's growing ageing population and the increasing demand for retirement villages is addressed in the RVA's submission on PC19, 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 Central Otago. Central Otago'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 PC19

- 11 Ryman adopts the RVA's submission on PC19. In addition, Ryman wishes to emphasise that PC19 will have a significant impact on the provision of housing and care for Central Otago'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 PC19.
- 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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