

Before the Independent Hearings Panel
Christchurch City Council

under: the Resource Management Act 1991

in the matter of: Submissions and further submissions in relation to Plan
Change 14 to the Christchurch City Plan

and: **Retirement Villages Association of New Zealand
Incorporated**
(Submitter 811)

Statement of Evidence of **John Collins** on behalf of the
Retirement Villages Association of New Zealand Incorporated

Dated: 20 September 2023

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**STATEMENT OF EVIDENCE OF JOHN COLLYNS ON BEHALF OF
THE RETIREMENT VILLAGES ASSOCIATION OF NEW ZEALAND
INCORPORATED**

INTRODUCTION

- 1 My full name is John Nicholas Charles Collyns.
- 2 I am the Executive Director of the Retirement Villages Association of New Zealand Incorporated (*RVA*). I was appointed Executive Director of the RVA in October 2007, and have now been in the industry for over 15 years.
- 3 Although I do not give evidence as an expert witness, I have considerable knowledge and understanding of the aged population and the retirement sector and its challenges. I have given evidence in a number of plan change hearings, including hearings relating to a number of Intensification Planning Instruments (*IPIS*). I also gave evidence for the Christchurch Replacement District Plan process and for the more recent Plan Change 5 process.
- 4 I am generally familiar with Plan Change 14 to the Christchurch City Plan (*PC14*) as it relates to the submissions lodged by the RVA and Ryman Healthcare Limited (*Ryman*). I also note that I have read the Council Officers' Report where it addresses the RVA's and Ryman's submission points.

SCOPE OF EVIDENCE

- 5 My evidence will address:
 - 5.1 Ageing population demographics, health and wellbeing characteristics, and related demand for retirement villages;
 - 5.2 The retirement housing and care crisis, and government recognition of the challenges ahead;
 - 5.3 The role of retirement villages in responding to that crisis, and other benefits of villages;

- 5.4 The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (*Enabling Housing Act*) and our request for a consistent retirement village planning framework in Christchurch City; and
- 5.5 Brief comments on PC14 as to whether it appropriately enables housing and care for the ageing population, noting Mr Richard Turner will address these matters in further detail.
- 6 Relevant background information on the RVA, the wider regulatory context and retirement village typologies is provided in **Appendix 1**.

EXECUTIVE SUMMARY

- 7 The RVA represents the combined interests of the owners, developers and managers of registered retirement villages throughout New Zealand.
- 8 New Zealand, including Christchurch, has a rapidly increasing ageing population. Christchurch City's 75+ population (the key demographic for retirement villages) is forecast to grow from 25,400 people in 2018 to 49,800 people in 2048.¹ And, people are living longer. However, their health care needs, particularly after age 85, are also increasing and becoming more complex. There are increasing rates of people with multiple health conditions that affect their daily living.
- 9 The demographic changes, coupled with a trend towards people wishing to live in retirement villages, means that the demand for retirement accommodation and aged care will continue to grow and will outstrip supply. Unless ongoing development of retirement villages is enabled, many of Christchurch's older residents are likely to be living in unsuitable accommodation. These circumstances will impact their physical health and safety and mental wellbeing.

¹ Statistics New Zealand, Subnational Population projections, December 2022 as at 11 September 2023.

- 10 The Government has confirmed, in its Government Policy Statement on Housing and Urban Development (*GPS-HUD*),² that housing and caring for the rapidly increasing ageing population is a key housing and urban development challenge facing New Zealand.
- 11 The RVA agrees. We consider that the need to enable appropriate accommodation and care options for older people is a matter of great importance for New Zealand and Christchurch. Retirement villages play a critical role in communities by providing specialist accommodation that meets the needs of older people. This accommodation has a range of social benefits, including enabling physical and mental wellbeing and independence. Retirement villages also help to materially address the general housing crisis, reduce “bed blocking” in hospitals and result in employment and economic benefits.
- 12 The RVA’s members are currently heavy users of RMA processes. Members rely on resource consents to authorise much needed retirement developments, and to provide for ongoing operational needs for villages and other developments. However, as the RVA’s submission outlines, the RMA has caused a number of major challenges.
- 13 The RVA considers that planning provisions must acknowledge that retirement villages and other aged care facilities are part of the fabric of residential living environments, particularly given changing demographics. Retirement villages provide long-term homes for their residents, in a variety of different forms that respond to the particular needs of older people. They also provide tailored amenities for the use of residents.
- 14 Plans also need to take account of the reality that there is a limited number of available sites for retirement villages. These sites need to be used efficiently. We acknowledge the potential for retirement villages to have effects on the external environment. We agree that

² GPS-HUD was issued in September 2021.

planning controls are needed to manage potential effects. But, these controls need to be clear and proportionate. It is also important that the specialist functional and operational needs of retirement villages and their residents are acknowledged. These needs mean that retirement villages – although expected and able to fit in and manage their external effects adequately - can have a different look and feel to typical residential uses.

- 15 Accordingly, the RVA and its members were greatly encouraged by the Enabling Housing Act. We see the present process as a significant enabler of accelerating housing intensification for the ageing population. As well as participating in this plan review, I note that the RVA is heavily engaged in Intensification Streamlined Planning Processes (*ISPP*) across the country. We are seeking consistent provisions in all the 'Tier 1' areas, as well as other areas undertaking plan changes to give effect to the National Policy Statement for Urban Development 2020 (*NPSUD*), which we consider appropriately respond to the relevant statutory directions. Consistency is very important for certainty and efficiency. I also note that the RVA has consulted heavily with its members to ensure the provisions we seek have unified support.
- 16 In Christchurch, the RVA participated in the Replacement District Plan process which resulted in provisions that are relatively enabling and tailored towards the needs of retirement villages (compared to other plans around New Zealand). The experience of operators implementing those provisions is that refinements to the provisions are required to ensure the provisions respond to the particular characteristics of retirement villages and their residents, as well as the housing intensification directions provided in the Enabling Housing Act.
- 17 The relief sought by the RVA is ultimately intended to better enable the delivery of housing for older persons, in particular by ensuring the functional and operational characteristics of retirement villages are recognised and provided for. I re-emphasise here the importance and benefits of national consistency for retirement

village planning in New Zealand. We would strongly encourage the Panel to prefer our provisions with that point in mind.

- 18 The specific changes sought by the RVA are contained in Mr Turner's statement of evidence.

AGEING POPULATION DEMOGRAPHICS

New Zealand

- 19 The proportion of older people in our communities compared to the rest of the population is increasing. Soon, there will be more people aged 65+ than children aged under 14 years.³ By 2034, it is expected that New Zealand will be home to around 1.2 million people aged 65 and over - just over a fifth of the total population.⁴
- 20 The ageing population of New Zealand reflects the combined impact of:
- 20.1 Lower fertility;
 - 20.2 Increasing longevity (due to advances in medical technology and increased survival rates from life-threatening diseases); and
 - 20.3 The movement of the large number of people born during the late 1940s to early 1960s (the "baby boomers") into the older age groups.
- 21 The largest increases in the 65+ age group will occur in the 2020s and 2030s, as the "baby boomers" move into this age group.
- 22 The growth in the 75+ age bracket is also increasing exponentially (as illustrated by the graph⁵ below). It is estimated that 381,600 people in New Zealand were aged over 75 in 2023. By 2048, the

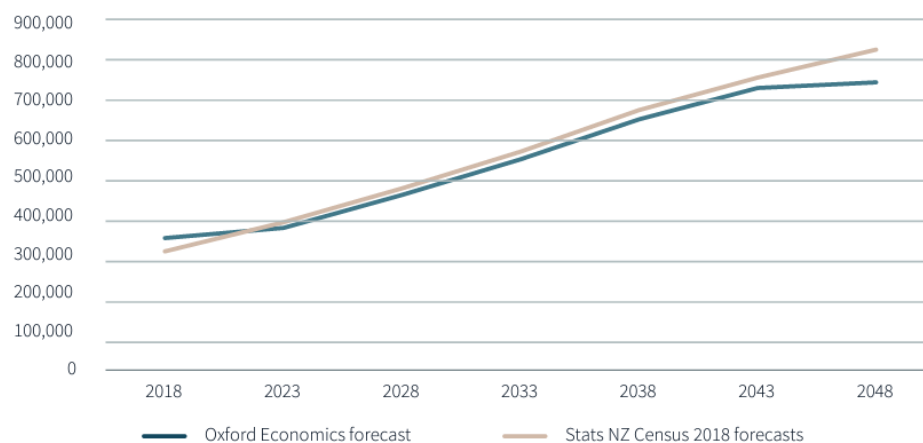
³ Better Later Life – He Oranga Kaumatua 2019 to 2034, page 6.

⁴ Ibid.

⁵ Jones Lang LaSalle, NZ Retirement Villages and Aged Care Whitepaper, August 2023, page 10.

population aged 75+ is forecasted to more than double to 804,600 people nationally.⁶

Figure 1 - Total New Zealand 75+ years population 2018-2048



Source: JLL Research; Statistics New Zealand, Oxford Economics

- 23 Older people aged 85+ comprise the most rapidly increasing age group in the country, with the numbers projected to more than double from 96,100 in 2023 to 227,600 in 2048. Given around 45% of this age group require aged care beds, this growth will create a need for a minimum of an additional 84,700 aged care beds to be provided by 2048.

Christchurch City context

- 24 The 75+ age bracket in Christchurch is growing at a similar rate. Statistics New Zealand estimates that in 2018, 25,400 people were aged over 75. By 2048, this number is forecast to increase to 49,800.⁷
- 25 The growth in the 85+ age bracket in Christchurch is also very significant. Statistics New Zealand provides that in 2023, 8,100

⁶ Statistics New Zealand, National Population Projections, by age and sex, 2022 (base) – 2073 as at 11 September 2023.

⁷ Statistics New Zealand, Subnational Population projections, December 2022 as at 11 September 2023.

people are aged over 85.⁸ By 2048, this number is predicted to more than double to 17,180.⁹

Health and wellbeing of older people

- 26 There are a range of health factors which impact on people's wellbeing and independence and which draw them to live in retirement villages. Health factors can affect even the most basic tasks such as the ability to bath, dress, move around the house, use the toilet, maintain continence and prepare meals. People may also have trouble with housekeeping, taking medication, shopping, managing their own finances, travelling, and using the telephone for communication.
- 27 Mental wellbeing issues are also growing, including isolation, loneliness, and related depression due to many older people living alone, and often also being separated from family and friends due to their increasing mobility restrictions.
- 28 Professor Kerse addresses these matters in more detail in her evidence.
- 29 In my experience, retirement villages are an important way to fight social isolation and loneliness. Based on recent data collected by UMR Research New Zealand,¹⁰ the most important factors for people when deciding to move into a retirement village are 'security and safety', 'peace of mind' and 'hassle-free lifestyle'. Villages provide safe, warm, appropriate housing and a community of interest for their residents with the opportunity for socialisation should they choose to take it up. This has wider benefits for the community as a whole. For example, the improved social and health support provided in retirement villages alleviates pressure placed on health

⁸ Ibid.

⁹ Ibid.

¹⁰ UMR Research New Zealand, 'Residents Survey – Retirement Villages Association', January 2021. The results were based on questions asked in an online survey distributed to 100 retirement villages across New Zealand.

and social care services freeing up these resources for other community members.

Suitability of accommodation

- 30 Because of these health and wellbeing issues, many of New Zealand's older residents are currently living in unsuitable accommodation. "Unsuitable accommodation" in this context can mean a couple or a single person living in a large house that is expensive and difficult to maintain and heat properly, has barriers to mobility such as stairs, or is built on a hill, or has a garden that they cannot maintain. Unsuitable accommodation could also include housing that is of such a distance from key services and amenities that it limits their access to their community and care needs.
- 31 Retirement villages allow older people to continue living in their established community, while down-sizing to a more manageable property (i.e. without stairs or large gardens). Retirement village living provides security, companionship and peace of mind for residents. Residents will also, in most cases, have easy access to care and other support services.
- 32 In this context, it is also important to note that retirement villages have a very different new-build pattern than the rest of the country's new-build housing stock.¹¹ The retirement village industry is building units that match the needs of smaller households, with approximately 90% of retirement village units providing one or two bedrooms.¹² Retirement units are also purpose-built for older people. They are accessible for those with mobility restrictions, are modern, warm and comfortable, and responsibility for their upkeep and maintenance falls on the village operator rather than the resident.
- 33 Further, retirement villages generally offer extensive on-site amenities for the use of residents, such as pools, gyms, theatres,

¹¹ CRESA, Retirement Village Housing Resilience Survey (June 2014), and Equity Release – Realities for Older People (August 2016).

¹² CRESA, Equity Release – Realities for Older People, August 2016.

libraries, bars and restaurants, communal sitting areas, activity rooms, bowling greens, and landscaped grounds. These amenities are provided to meet the specific needs of retirement village residents, leading to significant positive benefits for residents.

RETIREMENT VILLAGE DEMAND

Retirement village role in providing housing

- 34 Retirement villages already play a significant part in housing and caring for older people in New Zealand.
- 35 Presently, 14% of the 75+ population live in retirement villages, with the highest regional penetration rate in the Bay of Plenty at 19%.¹³ The overall penetration rate for the country has remained consistent from 2021 to 2022 at 14%, with only slight variation experienced by some regions.¹⁴
- 36 At the same time as the aged population is increasing, the demand for retirement villages is increasing due to:
- 36.1 A growing acceptance of the benefits of living in a village;
 - 36.2 A longer life expectancy and continuing demand for care. In this regard, retirement villages cater to the specific needs of residents with differing levels of health and independence; and
 - 36.3 An increasing demand for purpose-built, comfortable and secure dwellings. The RVA's members have established reputations for building high quality villages to address the needs of residents and employing professional and caring staff.

¹³ Jones Lang LaSalle, NZ Retirement Villages and Aged Care Whitepaper, August 2023, page 29.

¹⁴ Ibid.

- 37 The RVA's members have 412 villages across the country, providing homes for around 50,200 residents. Over the next 5 to 10 years, that is anticipated to grow significantly with 152 new villages and 90 expansions to existing villages, providing homes for approximately 30,500 additional residents.
- 38 In Christchurch, 16.6% of the 75+ age group population live in a retirement village.¹⁵ The RVA expects that there will be a significant increase in demand for retirement villages in the district. The average age of our residents, as at 31 December 2022, was 83.2 years of age, which is much older than in other districts.¹⁶
- 39 As at 31 December 2022, there were 61 retirement villages in Christchurch,¹⁷ made up of 4,162 units which provide homes to around 4,722 residents. Included in this number are 29 villages that are developing or expanding. Construction of new villages and/or planned expansion of existing villages will provide an additional 2,244 units. Even with this recent development, there will be a need for a number of additional retirement villages to meet the demands of the ageing population and increasing penetration rate in Christchurch.

The growing crisis

- 40 The RVA considers that the under-provision of retirement living and aged care in New Zealand is at crisis point. It is generally accepted that the growing ageing population is facing a significant shortage in appropriate accommodation and care options. This problem is immediate and projected to worsen in the coming decades as older age groups continue to grow.

¹⁵ Resident population of 4,722 people divided by the estimated population 75+ years (28,490) = 16.6%.

¹⁶ RVA annual member survey as at 31 December 2022.

¹⁷ This includes 51 RVA member villages and 10 retirement villages that are not RVA members, noting some of these villages are operative but a number of these villages are under construction.

- 41 The growing ageing population, together with the above-noted trend towards people wishing to live in retirement villages, means that demand for this typology is continuing to grow. This trend is creating a severe and growing shortage of retirement villages, as supply cannot match demand.
- 42 This crisis is evidenced by the increasing number of the RVA's members' villages that have waiting lists (including existing villages and those under construction). Many RVA member villages have waiting lists of 2 or more years, which is a significant amount of time for people in need of care to wait.
- 43 The COVID-19 pandemic has also exacerbated the crisis. Overall, retirement villages performed remarkably well in protecting the most vulnerable by providing safe communities and companionship during the tough periods of lockdown. This performance has resulted in an even stronger demand to access retirement villages and further limited stock available.¹⁸
- 44 Mr Brown explains that the current undersupply in Christchurch is less pronounced than in other parts of the country. Nevertheless, I consider the growth in older age groups, along with anticipated increased in the penetration rate in Christchurch, means there is a critical need to ensure retirement village development continues to meet expected growth in demand.
- 45 The Government has recognised that housing and caring for the rapidly growing aged section of the population is a key housing challenge in its overarching direction for housing and urban development. The GPS-HUD records that "*[s]ecure, functional housing choices for older people will be increasingly fundamental to wellbeing.*"¹⁹

¹⁸ Jones Lang LaSalle, NZ Retirement Villages and Aged Care Whitepaper, August 2023, pages 4 and 22.

¹⁹ GPS-HUD, page 10.

- 46 A key connecting government strategy, Better Later Life – He Oranga Kaumatua 2019 to 2034, outlines what is required to have the right policies in place for our ageing population, including creating diverse housing choices and options.²⁰ The strategy notes that “[m]any people want to age in the communities they already live in, while others wish to move closer to family and whānau, or to move to retirement villages or locations that offer the lifestyle and security they want.”²¹
- 47 Further, the strategy notes “Local government also has a key role in making sure communities cater for the needs of their older populations. Urban planning and public transport, design of public spaces and provision of local facilities all affect older people’s ability to stay in the community, to stay connected and physically active, and to feel safe”.²²
- 48 The RVA supports that government policy and seeks that it be implemented in local planning documents, including PC14.

Retirement villages’ role in addressing the housing crisis

- 49 Retirement villages help to ease demand on the residential housing market and assist with the housing supply shortage in New Zealand. That is because growth in retirement village units is faster than growth in the general housing stock. And, the majority of new villages are located in major urban centres. The retirement village sector therefore also contributes significantly to the development of New Zealand’s urban areas, and the particular challenges urban areas face.
- 50 The retirement village sector allows older New Zealanders to free up their often large and age-inappropriate family homes and move to comfortable and secure homes in a retirement village. The RVA estimates that around 5,500 family homes are released back into

²⁰ The GPS-HUD is [available online](#).

²¹ GPS-HUD, page 32.

²² GPS-HUD, page 52.

the housing market annually through new retirement village builds. This represents a significant contribution to easing the chronic housing shortage. A large-scale village, for example, releases approximately 300 houses back onto the market to be more efficiently used by families desperate for homes. To illustrate, retirement units are generally occupied by an average of 1.3 people per unit, compared to an average of 2.6 people per standard dwelling.

Other benefits of retirement villages

- 51 The retirement village sector produces other broader benefits, including:
- 51.1 The sector employs approximately 19,000 people to support day-to-day operations. Between 2018 and 2026, approximately 9,500 new jobs will have been created from construction of new villages. The sector contributes around \$1.1 billion to New Zealand's GDP from day-to-day operations.²³ More recently, and importantly, the sector has generated jobs in industries that have been impacted by COVID-19 (such as hospitality and accommodation).
 - 51.2 The contribution of retirement village construction is also substantial. For example, a large-scale new village will cost in the order of \$100-\$200 million to construct. Retirement village construction is also expected to employ approximately 5,700 FTEs each year.²⁴
 - 51.3 Retirement villages also support Te Whatu Ora, Health New Zealand by providing health care support for residents that would otherwise be utilising the public healthcare system, thereby reducing "bed blocking" in hospitals.

²³ PWC, 'Retirement village contribution to housing, employment, and GDP in New Zealand' (March 2018) at page 4.

²⁴ Ibid.

51.4 Due to the lower demand for transport (including because of on-site amenities), retirement villages contribute proportionately less to transport emissions than standard residential developments. Operators also invest in a range of other methods to reduce carbon emissions from the construction and operation of villages.

PLANNING FOR RETIREMENT VILLAGES

Challenges

- 52 The RVA's members are currently heavy users of RMA processes. Members rely on resource consents to authorise much needed retirement developments, and to provide for ongoing operational needs for villages and other developments.
- 53 However, as the RVA's submission outlines, the RMA has caused a number of major challenges:
- 53.1 Older people want to 'age in place' within their existing communities. However, suitable sites in these existing communities are extremely rare, particularly in main urban centres;
 - 53.2 District Plans provide poorly for retirement villages. There is significant inconsistency in retirement village planning frameworks across New Zealand. These issues lead to lengthy consenting debates and ultimately delays the delivery of critical accommodation for older people;
 - 53.3 RVA operators invest significantly in plan making processes, which frequently change;
 - 53.4 The unique functional and operational requirements of villages are often not reflected in district plans, or correctly understood by council officers;
 - 53.5 District plans often have excessive regulation with burdensome urban design requirements and complex rules.

Assessments that are required under certain rules are complex and costly;

53.6 Public notification is often the default for retirement villages, resulting in consent processes focussing on minor amenity matters. Self-interested neighbours can create huge delays and disputes for no material environmental benefit. These processes also result in significant uncertainty for operators; and

53.7 Retirement villages have a substantially lower demand profile for council infrastructure compared with standard residential developments due to low occupancy levels and reduced activity levels. Councils often impose financial and development contributions that are disproportionate to this demand profile.

What we need

- 54 The RVA considers better alignment of planning regimes and consistency within district plans will result in a better, more efficient system in the long term. Based on the RVA's members' experience, the RVA considers it is highly desirable to provide a common approach to approving the construction, operation and maintenance of retirement villages. A consistent framework would be very beneficial in terms of reducing investment in planning processes and facilitating the consenting of villages. The framework would be implemented in all zones where residential activities are anticipated to ensure people can "age in place".
- 55 The RVA has achieved good progress on bespoke planning regimes for retirement villages through the likes of the Christchurch Replacement District Plan process and through Plan Change 5.
- 56 However, implementation of the operative provisions have revealed that a number of further refinements to the provisions for retirement villages are needed. The RVA is also seeking amendments to the provisions to align with the NPSUD and the Enabling Housing Act, as well as to achieve national consistency.

- 57 The RVA is heavily engaged in ISPPs across the country. We are seeking consistent provisions in all the 'Tier 1' cities, as well as other areas where councils are undertaking plan changes to give effect to the NPSUD, which we consider appropriately respond to the relevant statutory directions. Consistency is very important for certainty and efficiency. I also note that the RVA has consulted heavily with its members to ensure the provisions we seek have unified support.
- 58 The key outcome we seek is to accelerate housing intensification for the ageing population in a consistent and enabling regulatory framework which clearly responds to the needs of an ageing population and the unique features of retirement village activities. This includes recognising retirement villages as a residential activity and enabling retirement villages consistently throughout all relevant zones. We also seek to remove undue planning restrictions, which are needed to better reflect the Government's housing intensification requirements.

PLAN CHANGE 14 AND THE COUNCIL OFFICER'S REPORT

Overview

- 59 Overall, the RVA considers PC14 must:
- 59.1 Recognise that retirement villages are a residential activity;
 - 59.2 Meet the housing needs of older people, including to "age in place" in their existing communities, by enabling retirement villages in all appropriate zones;
 - 59.3 Provide for the efficient use of suitable sites for retirement villages in all zones that anticipate residential activities (including both residential and commercial and mixed-use zones) given the shortage of such sites; and
 - 59.4 Provide for the day-to-day needs of residents through consenting requirements that recognise the unique functional and operational needs of retirement villages.

These matters are addressed in more detail below.

Recognise that retirement villages are a residential activity

60 A key issue with many existing district plans is their failure to explicitly recognise that retirement villages are a residential activity. This issue has resulted in consenting challenges. Members of the community, and sometimes even council officers can take the view that retirement villages are non-residential activities that should only be provided for in non-residential zones, or they may seek to assess different parts of a village in a different manner (such as a commercial activity).

61 I understand the Council Officer's Report suggests retirement villages are not residential uses.²⁵

62 The primary purpose of retirement villages is to provide permanent homes for the residents that live there, whether that be in higher care environments or in independent living. In the RVA's experience, people living in retirement villages would universally describe the village as their home. Retirement villages do provide a range of ancillary services. However, those services are provided for residents and their guests only. They complement the residential function of retirement villages by meeting the particular needs of the older residents. These services are not typical commercial activities, because they are not available for the public and they are incorporated within the broader residential activity. I also note, as Mr Brown has also pointed out, that planning approaches which seek to assess different components of retirement villages separately create significant complexities and delays.

Meeting the housing needs of older people, including to "age in place" in their existing communities

63 The RVA's members' experience is that older people want to stay in the communities in which they currently live, and have lived for many years, during their retirement. This is called 'ageing in place'.

²⁵ Section 42A Report – 05 Residential, 6.1.33.

It allows residents to remain close to their families, friends, familiar amenities and other support networks. It promotes activities that improve residents' wellbeing, including physical activity, social engagement and intergenerational activity, due to the easily accessible surrounding destinations in a familiar neighbourhood. It allows residents to access public transport to facilitate these activities as independent driving ability declines and climate change impact increases. It also allows residents to continue to play an integral part in the communities that they have helped establish.

64 To meet the housing needs of the ageing population and allow older people to "age in place", it is important that district plans provide for retirement villages in all appropriate zones, including residential, commercial and mixed-use zones.

65 It is noted that the Christchurch Replacement District Plan Independent Hearings Panel (chaired by a former High Court judge, with members including another former High Court judge, an Environment Court judge and experienced independent commissioners) acknowledged the importance of ageing in place:²⁶

[332] Dr Humphrey's evidence stressed the clear health and social evidence of people ageing in their own communities. We have also taken particular note of Dr Humphrey's evidence as to the importance of providing choice for ageing in place. That evidence was supported by the evidence of Mr de Roo. We find that ageing in place, whereby older persons have choices to downsize from their family homes yet remain within their familiar neighbourhoods, is important not only for the wellbeing of our older citizens but also for the communities of which they should continue to contribute to and be part of. In addition to providing choice, assisting affordability is also important. Those priorities are also generally reflected in the Statement of Expectations.

66 I understand the operative District Plan goes some way towards providing for retirement villages. Nevertheless, as Mr Turner

²⁶ Decision 10 – Residential (part) (and relevant definitions and associated planning maps) (10 December 2015).

explains, a number of refinements to the framework are required based on experience from implementing the operative Plan and to achieve consistency with the new Enabling Housing Act directions. PC14 has, as I understand, not adequately reflected these matters.

Provide for the efficient use of suitable sites for retirement villages

- 67 Sites in existing residential areas which are appropriate for retirement village and aged care developments are extremely rare, due to size and location requirements. As such, other sites outside of residential zones that provide good amenity and access to services (e.g. health facilities, restaurants and cafes, etc.) will also be considered by the RVA's members.
- 68 Sites of the required size and in good locations are highly unique and valuable resources in our larger cities. They need to be efficiently used if the housing needs of the ageing population are to be met.
- 69 In addition, large sites provide retirement village operators with a range of opportunities to internalise effects by using a variety of design techniques. Examples include generous setbacks, stepped up building heights, and carefully designed layouts to achieve good outcomes for streets and public open spaces, as well as reasonable amenity for residential neighbours. The main building of many modern villages, for example, is often bulkier and of a different height from surrounding neighbourhoods and is therefore often placed in the centre of the village.
- 70 Further, areas will change and develop over the next 5 to 10 years and may become more suitable for retirement village activities. Our members have a proven track record of making efficient use of scarce land resources and establishing high quality intensification – both 'up and out' in brownfield and greenfield scenarios. However, if planning constraints are overly restrictive or uncertain, members will simply not be able to invest in new sites. It is therefore

important the City Plan remains sufficiently flexible to account for changes in Christchurch's urban environment.

- 71 For those reasons, I support the RVA submission seeking a policy that enables the efficient use of larger sites.

Provide for the day-to-day needs of retirement villages including their unique functional and operational needs

- 72 A key consenting challenge faced by the RVA's members is an expectation from council officers that the internal amenity controls used for traditional housing typologies (e.g. outlook, sunlight, privacy, outdoor living spaces, landscaping and the like) are appropriate for retirement villages. Wide discretions and requirements set out in residential design guides also slow down consenting processes substantially. I understand that the retirement village matters of discretion in this plan do not enable consideration of internal amenity, and that approach is supported.
- 73 Retirement village and aged care facilities tend to be different from 'typical' residential housing in order to properly cater for resident health, wellbeing, mobility and amenity needs. To illustrate, retirement villages contain a range of unit types to cater for the different care and mobility needs of the residents. The accommodation ranges from independent townhouses and apartments, through to serviced apartments, hospital beds and dementia rooms. This range of living options will include different types of amenities (e.g. kitchens, bathrooms, lounges, etc.) and layouts (e.g. serviced apartments and care rooms need to have quick, accessible, and all weather access to communal living and dining areas) to cater to the specific needs of residents.
- 74 Further, in the experience of the RVA's members, council officers often attempt to redesign village layouts based on what they think might be suitable, without proper knowledge of village and residents' needs.
- 75 Retirement village residents have a much greater degree of choice of 'living rooms' than residents in typical dwellings through the

provision of several communal living spaces. These areas are typically well oriented for daylight and enjoy an outlook into a large and attractive outdoor space.

- 76 In this regard, I note that retirement villages provide most, if not all, of the resident amenities on-site without the need for external community infrastructure or space. These services and amenities are important due to the frailty and lack of mobility of many residents. They also provide a better quality of life for residents than could be offered without these communal services. For example, a townhouse would not have space for a pool or gym.
- 77 Retirement villages also use new, low maintenance building products and design techniques to ensure their efficient operation. These design requirements can result in change when compared to surrounding neighbourhoods that were built many decades in the past.
- 78 The unique characteristics of retirement villages also mean external interfaces can look different to other residential developments. In my experience however, retirement villages are high quality and fit very well in their environments. They are peaceful and tranquil places, often including significant landscaping and open spaces. Retirement village operators also use a range of design techniques to ensure effects on streets/public spaces and neighbours are appropriately managed.
- 79 Mr Brown's evidence provides his experience obtaining resource consents under the operative Plan. We are confident that other operators in Christchurch have had similar experiences. In my view, his experience demonstrates the need for refinements through PC14 to better provide for the particular characteristics of retirement villages and their residents. Mr Turner address the specific refinements sought by the RVA.

CONCLUSION

- 80 The RVA considers that PC14 must be amended to properly respond to the growing demand for retirement housing and care and provide for the wellbeing of older people within the community. The specific changes sought by the RVA are addressed in Mr Turner's statement of evidence.

John Collins

20 September 2023

APPENDIX 1 – BACKGROUND INFORMATION

RVA

- 1 The RVA, incorporated in 1989, is a voluntary industry organisation that represents the interests of the owners, developers and managers of registered retirement villages throughout New Zealand. It is also established to govern and develop operating standards for the day-to-day management of retirement villages and protect their residents' wellbeing.
- 2 Today, the RVA has 412 member villages throughout New Zealand, with approximately 41,500 units that are home to around 50,200 older New Zealanders. This figure is 96% of the registered retirement village units in New Zealand.²⁷
- 3 The RVA's members include all five publicly listed companies (Ryman Healthcare, Summerset Group, Arvida Group, Oceania Healthcare, and Radius Residential Care Ltd), other corporate groups (such as Metlifecare and Bupa Healthcare) independent operators, and not-for profit operators (such as community trusts, and religious and welfare organisations).

The wider regulatory context

- 4 The retirement village industry is regulated by the Retirement Villages Act 2003 (*RV Act*), associated regulations, and codes of practice, including the Code of Practice and a "Code of Resident Rights", all established through the RV Act.
- 5 'Retirement village' is defined in section 6 of the RV Act as²⁸:

... the part of any property, building, or other premises that contains 2 or more residential units that provide, or are intended to provide, residential accommodation together with services or facilities, or both, predominantly for persons in their retirement, or persons in

²⁷ There are also almost 6,000 Occupation Right Agreements for care suites as part of the aged care system.

²⁸ Noting this is slightly different to the RMA definition.

their retirement and their spouses or partners, or both, and for which the residents pay, or agree to pay, a capital sum as consideration and regardless of [various factors relating to the type of right of occupation, consideration, etc]...

- 6 The regulatory regime is focussed on consumer protection via a comprehensive disclosure regime, so that residents can make an informed decision to move to a village.
- 7 This regulatory regime includes the following:
 - 7.1 Registration of retirement villages with the "Registrar of Retirement Villages". The Registrar places a memorial on the land title. The memorial means that the village can only be sold as a retirement village and that the residents' tenure is ranked above all other creditors to the village. The residents have absolute rights to live in their units and have access to the village amenities.
 - 7.2 Retirement village operators are required to appoint a "Statutory Supervisor" whose job is to protect residents' interests and report to the Registrar and the Financial Markets Authority that the village is being operated in a financially prudent manner.
 - 7.3 Operators are required to provide intending residents with a disclosure statement that sets out the village's ownership, financial position, status, and a range of other important information. This statement provides comprehensive guidance to ensure that a resident's decision to move into a retirement village is an informed one.
 - 7.4 Before signing a contract (an "Occupation Right Agreement" or "ORA"), an intending resident must consult a solicitor who must explain the details of the contract and sign an affirmation that they have provided that advice.

- 8 The codes of practice that regulate the industry include a code of practice and a code of residents' rights.²⁹
- 9 The Code of Practice is administered by the Ministry of Business, Innovation and Employment, and it governs the day-to-day management of the villages. The Code sets out the minimum standards for the operation of retirement villages. These standards address a wide variety of matters, including documents that operators must provide to intending residents, staffing policies and procedures, safety and security policies, fire and emergency procedures, the frequency and conduct of meetings between residents and operators, complaint procedures, as well as communications with residents.
- 10 The RVA is the sole auditing agency for its members' compliance with the Code of Practice. Audits of RVA members are undertaken every three years by accredited auditing agencies. There is also a Disciplinary Tribunal which hears complaints about member villages. This role was created at the RVA's AGM in 2009. The Tribunal is chaired by the Hon Dr John Priestly KC, a retired High Court Judge. At this stage there have been no cases brought to the Tribunal.
- 11 The Code of Residents' Rights is set out in the RV Act.³⁰ The Code is a summary of the minimum rights conferred on retirement village residents. It ensures that residents are respected and consulted on material matters that affect their contracts. The Code sets out a residents' rights to services, information, and consultation, the right to complain, the right to a speedy and efficient process for resolving disputes, the right to use a support person or representative in dealings with the operator or other residents at the village, the right to be treated with courtesy, and the right not to be exploited by the operator.

²⁹ Both codes are available online ([Code of Practice](#) and [Code of Residents Rights](#)).

³⁰ Schedule 4.

- 12 This wider regulatory context means that the retirement village industry is highly regulated and, as a result in my experience, characterised by high quality operators. The majority of industry participants are long term operators of villages, not developers, so I understand that their reputation is highly important to them.

Retirement Village typologies

- 13 'Retirement Village' is an umbrella term given to all types of retirement living. There are two different types of retirement villages, 'lifestyle retirement villages' and 'comprehensive care villages':
- 13.1 Lifestyle retirement villages focus mostly on independent living units with a small amount of serviced care on a largely temporary basis. When a resident becomes frailer over time, usually they would be forced to leave a lifestyle village as the provision of serviced care is usually not suitable as a long-term solution. Relocating into a new and unfamiliar environment at this time is often very stressful for residents.
- 13.2 Comprehensive care retirement villages provide a full range of living options to residents, providing a 'continuum of care' from independent living to serviced care, rest home, hospital and dementia level care within the same village. This 'continuum of care' approach allows residents to remain in the same 'home' as their needs change.
- 14 Each village type attracts a different resident demographic. The average age of residents moving into comprehensive care retirement villages is early 80s, with an overall average age in the mid to late 80s. These residents usually choose to live in their own homes for as long as possible and move to a retirement village primarily due to a specific need (e.g. deteriorating health, mobility, or for companionship). Lifestyle villages cater for a younger, more active, early retiree. The average age of a resident moving into a lifestyle village is approximately late 60s.

- 15 The RVA has seen a marked change in retirement accommodation over the last 20 years. In the past, lifestyle villages without care were relatively common. As the population ages, the retirement village industry is seeing a greater demand for a 'continuum of care' in one location – from independent units through to hospital and dementia care. Today, many villages are being developed with some degree of residential care in their campus. Some villages are committed to a full continuum of care, while others focus on providing a smaller number of rest home beds that are available for residents if they are needed.
- 16 Another important trend is for operators to build serviced apartments, where a resident moves in and out of care as required but without having to physically move from their apartment. These developments are a direct response to market demands. The sector is focused on providing a mix of independent living units and care options to meet the range of financial, social and other resources our residents have.
- 17 A number of operators also focus on providing social housing as part of their villages. This can be a mix of affordable Occupation Right Agreements and rental units.
- 18 'Care only' facilities are increasingly rare. This is because under the current government funding regime for health care provision it is not possible to justify the capital cost of building stand-alone residential care facilities. As a result, no residential care facilities, apart from extensions to existing facilities, have been built in the last ten years or so.
- 19 Ultimately, the retirement village industry provides appropriate accommodation to address the specific needs of the older population, including a range of large and smaller scaled retirement villages and aged care homes with differing services, amenities and care. This variety enables differing price points and options, which are vital to enabling choices for the growing ageing population.