

Before the Independent Hearings Panel  
Christchurch

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

*in the matter of:* submissions and further submissions in relation to  
Proposed Plan Change 14 to the Christchurch 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: 23 June 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*) and the Retirement Villages Association of New Zealand (*RVA*) who are primary submitters on Proposed Plan Change 14 to the Christchurch District Plan (*PC14*). It responds to Christchurch City Council's (*Council*) proposed order of hearing topics for PC14 set out in a memorandum dated 12 June 2023 (*Council's Memorandum*).

2 Ryman and the RVA generally agree with the proposed timetable. However, they seek an altered order of hearing topics for PC14. They would prefer that residential zone provisions are combined into one hearing, and central city/commercial zone provisions are combined into another hearing. They think the hearing process may be more efficient if the residential zones are heard first.

**Order of hearing streams**

3 Ryman and the RVA are engaging in all 15 council intensification planning instruments. In their experience to date, most processes have included (in the order listed) a strategic overview hearing, residential zones hearing, centre/commercial/mixed use zones hearing followed by hearings on other zones and matters (if required). Ryman and the RVA consider that this order has been an efficient and logical way of hearing submissions, as the bulk of submissions have been centred on residential zones.

**Division of topics into hearing streams**

4 Ryman and the RVA acknowledge, as identified in Council's Memorandum, the need to split up PC14 topics into different hearing streams due to the number of topics to be addressed.

5 That said, it will relieve the resourcing load on them, and other parties if hearings are combined as much as practicable. For example, the separation of residential zones into 'Tranche 1' and 'Tranche 2' is not supported. It is important for the objectives, policies, rules and standards within a zone to be heard at the same time due to the interlinked nature of these provisions. This approach will also provide the Panel with a more comprehensive understanding as to how the chapter will operate as a whole.

6 It is also submitted, for similar reasons, that submissions on the central city and commercial zones should be heard at the same hearing.

- 7 Accordingly, Ryman and the RVA respectfully request that the Panel provide directions adopting the hearing topic allocations and order of hearings as follows:
- 7.1 Strategic Overview hearing;
  - 7.2 Residential Zone hearing (with 'Tranche 1' and 'Tranche 2' combined);
  - 7.3 Central City and Commercial Zones hearing (with 'Central City' and 'Commercial' combined); and
  - 7.4 The remaining hearing topics [(v) to (ix)] to be heard as proposed in Council's Memorandum.

**Luke Hinchey / Alice Hall**

Counsel for Ryman and the RVA

23 June 2023