

17 August 2018

Planning Standards  
c/- Ministry for the Environment  
PO Box 10362  
Wellington 6143

**By Email:** [planningstandards@mfe.govt.nz](mailto:planningstandards@mfe.govt.nz)

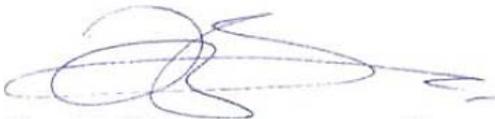
Dear Sir/Madam,

Please find **enclosed** submission on the Draft National Planning Standards on behalf of Arvida Group Limited.

Please do not hesitate to contact the undersigned if you have any questions.

Yours faithfully,

**Haines Planning Consultants Limited**



Daniel Shao | Associate

2165 ARVIDA DNPS SUB CVR LTR



---

## **SUBMISSION BY ARVIDA GROUP LIMITED**

### **ON THE DRAFT NATIONAL PLANNING STANDARDS**

---

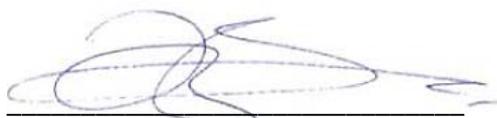
#### **Introduction**

1. Arvida Group Limited ("Arvida"), c/- Haines Planning Consultants Limited at the address for service below, makes this submission on the Draft National Planning Standards ("DNPS").
2. Arvida was formed in 2014 and now has 29 retirement villages across New Zealand. Each village operates independently and expresses its own character and identity.
3. As a retirement village operator, Arvida has an emphasis on providing a continuum of care from independent living through to specialised aged-care services. Arvida provides care services and accommodation to almost 4,000 residents, and employs approximately 276 registered nurses, 1,140 caregivers, and other village and support centre staff.
4. An Arvida village may comprise any, or all, of the following:
  - Independent living units.
  - Serviced apartments.
  - Care facilities, including rest homes, hospitals and dementia facilities.
  - Ancillary facilities, for example residents' lounges, cafes, libraries, theatres, hairdressers, swimming pools and other recreational and entertainment facilities.
5. Arvida has an active, nation-wide pipeline of brownfield and greenfield development projects and, as such, it is often involved with the resource consent process. It is acutely aware of the current inconsistencies in both the structure and substance of planning documents promulgated under the Resource Management Act 1991 ("RMA") and the associated difficulties and inefficiencies these bring. Arvida is therefore supportive of the DNPS's purpose in introducing a degree of consistency to a targeted set of planning provisions which can apply across New Zealand.

## The Submission

6. This submission only relates to the proposed definition of "retirement village premises".
7. Under the DNPS, it is proposed that retirement village premises will have the same meaning as in section 226A of the RMA (CM-1: Draft Definitions standard, page 87).
8. Section 226A is titled "*Savings in respect of cross leases, company leases, and retirement village leases*", and falls under Part 10 of RMA, which relates to "Subdivision and reclamations".
9. Section 226A(3) states "*for the purposes of this section, retirement village premises means premises (including any land and associated buildings) within a complex of premises for occupation as residences predominantly by persons who are retired and any spouses or partners of such persons.*"
10. The above definition serves a specific purpose in respect of retirement village leases, and does not currently have any meaning outside of section 226A(3). Indeed, Arvida considers that this definition does not adequately capture the range of activities that are typically found in a modern retirement village. If adopted in the DNPS without amendment, it will have the effect of precluding most integrated retirement villages with care and communal facilities.
11. Arvida seeks the following changes to the definition of retirement village premises:

means premises (including any land and associated buildings) within a complex of premises for occupation as residences and/or care facilities predominantly by persons who are retired and any spouses or partners of such persons, and may include accessory recreation, leisure and supported residential activities.
12. If there is any further opportunity to do so, Arvida wishes to be heard in support of this submission.
13. Arvida would be pleased to discuss the content of this submission with the relevant staff at the Ministry for the Environment.



Daniel Shao - Haines Planning Consultants Limited

On behalf of Arvida Group Limited

**Date:** 17 August 2018

**Address for Service:**

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
  
[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]

2165 ARVIDA DNPS SUB