

Form 5

Submission on Proposed Change 1 to the Regional Policy Statement for the Wellington Region

To: Greater Wellington Regional Council
Private Bag 907
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By email: regionalplan@gw.govt.nz

Name of submitter: Summerset Group Holdings Limited
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This is a submission on **Proposed Change 1** to the Regional Policy Statement for the Wellington Region.

Summerset Group Holdings Ltd (SGHL) could not gain an advantage in trade competition as a result of this submission.

The specific provisions of the proposal that the submission relates to, the submission points, reasons and decisions sought are set out in the attached table. SGHL seeks that the decisions sought in the attached table are adopted, or any other such relief and/or consequential amendments are made that achieve an equivalent outcome.

SGHL wishes to be heard in support of its submission. SGHL does not wish to present a joint case.



Signed: _____

Oliver Boyd
National Development Manager

On behalf of Summerset Group Holdings Limited

Date: 14 October 2022

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Submission introduction and summary

Summerset is one of New Zealand's leading and fastest growing retirement village operators, with more than 6,600 residents living in our village communities. We operate Comprehensive Care villages that offer a range of independent living options and care, meaning that as our residents' needs change, we have support and options available within the village. Summerset has 35 villages which are either completed or in development, spanning from Whangārei to Dunedin. We employ over 1,800 staff members across our various sites. Summerset welcomes the opportunity to provide feedback to the Council on Proposed Change 1 to the Regional Policy Statement for the Wellington Region, which in part responds to the National Policy Statement on Urban Development and the National Policy Statement on Freshwater Management.

Retirement villages play a key role in addressing the housing crisis, and the retirement living and aged care crises. The development of affordable retirement village dwellings such as those provided by Summerset help reduce land demand pressure and make further residential housing available. This increase in housing supply helps to relieve pressure on the housing market and contributes towards improved housing affordability in the long term. Affordable housing and the realistic prospect of home ownership for younger generations provides the opportunity for more secure accommodation than renting, and long term investment opportunities.

Summerset developments have a higher population density than traditional residential development. The development of affordable retirement village dwellings reduces overall land demand pressure and makes further residential housing available, as new village residents release their properties to the market.

Retirement villages also have benefits in reduced transport demand from residents, consequential reductions in the use and demand for infrastructure, and climate benefits resulting from the overall density of villages and the aforementioned transport benefits.

Retirement villages are typically established on sites of up to 10 hectares in size. Summerset's forward planning for site selection needs to be responsive to both planned development areas and opportunity sites that may arise. Summerset's submission is therefore concerned with ensuring that the RPS does not unduly restrict land availability in a manner that would impact on the competitive operation of land markets, and that the RPS is cognisant of a range of development typologies and provides for those variations in land use.

Support for submission in NPS-UD

The National Policy Statement on Urban Development (NPS-UD) is one of the drivers for Proposed Change 1 (PC1).

Objective 1 of the NPS-UD states:

New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural well-being, and for their health and safety, now and into the future.

Retirement villages facilitate this objective by enabling people of retirement age to provide for their social and economic well-being and for their health and safety.

Objective 2 requires that planning decisions improve housing affordability by supporting competitive land and development markets. As noted above, Summerset is concerned that the RPS does not unduly restrict the competitive operation of land and development markets and provides for a range of development typologies, including retirement villages.

Objective 4 of the NPS-UD notes that urban environments will change over time, while Objective 7 requires that local authorities are responsive to proposals that would supply significant development capacity.

These objectives are then given effect to through the subsequent policies. Policy 1 defines 'well-functioning' urban environment which is relevant to matters identified in the following submission table.

Policy 8 requires local authority decisions to be responsive to plan changes that would add significant development capacity and contribute to well-functioning urban environments. Summerset is concerned that the direction of the NPS-UD is not under-cut by the RPS by the inclusion of additional layers of complexity, or unnecessary duplication of the NPS-UD.

Provision	Support/Oppose/Amend	Submission	Relief Sought
Policy CC.2	Amend	<p>Policy CC.2 proposes to require District Plans to include objectives, policies and rules that require subdivision, use and development consent applications to provide travel demand management plans that would reduce reliance on private vehicle trips and maximise use of public transport and active modes for all new development over a specified threshold where there is potential for a more than minor increase in private vehicle movements.</p> <p>The policy creates uncertainty by shifting this requirement to district plan level, leaving the potential for individual district plans to set potentially varying thresholds. There is also uncertainty created through the use of ‘more than minor’ and related to the ongoing monitoring and enforcement of travel demand management plans.</p>	Delete Policy CC.2
Policy CC.4	Amend	<p>The policy requires district plans to include policies, rules and/or methods to provide for climate resilient urban areas that support delivering the characteristics and qualities of well-functioning urban environments as specified in Policy CC.14.</p> <p>Policy CC.14 in turn, lists a range of actions that will contribute to climate resilient urban areas. Linking those to a well-functioning urban environment broadens that existing definition as set out in Policy 1 of the NPS-UD and is not required.</p>	<p>Amend Policy CC.4 as follows:</p> <p><i>Policy CC.4 Climate resilient urban areas – district and regional plans (FPP)</i></p> <p><i>District and regional plans shall include policies, rules and/or methods to provide for climate-resilient urban areas by providing for actions and initiatives described in Policy CC.14 which support delivering the characteristics and qualities of well-functioning urban environments.</i></p>
Objective 22	Amend	<p>Objective 22 seeks to enable urban development where it “demonstrates the characteristics and qualities of well-functioning urban environments, which” and then lists a range of matters.</p> <p>Each matter is linked with an ‘and’ thereby creating a requirement that urban development achieves each of the listed matters before the objective would consider the urban development to be enabled.</p> <p>Policy 1 of the NPS-UD defines a ‘well-functioning urban environment’. If the objective is seeking to define a well-functioning urban environment then the definition of the NPS-UD should be the starting point. The policy has the effect of adding 11 additional aspects that would need to be addressed to</p>	<p>Amend Objective 22 by:</p> <ul style="list-style-type: none"> ▪ Remove the ‘and’ following each listed matter; ▪ Being based on the definition of ‘well-functioning urban environment’ as defined in Policy 1 of the NPS-UD; and ▪ Removing superfluous matters that are otherwise addressed by the RPS or NPS-UD.

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		consider a proposal to be a well-functioning urban environment. This is inconsistent with the intent of Policy 1 of the NPS-UD.	
Policy 55	Amend	<p>Policy 55 provides a range of matters to which particular regard must be had when considering urban expansion.</p> <p>The policy extensively adds to the definition of a well-functioning urban environment, particularly through matter (ii). Matter (ii) cross-references to other topic areas of the RPS that are otherwise relevant considerations and do not need to be included here.</p>	<p>Amend the policy to recognise the particular development requirements of certain development types, such as retirement villages, and by making the following changes:</p> <p><i>“When considering an application for a resource consent, or a change, variation or review of a district plan for urban development beyond the region’s urban areas (as at August 2022), particular regard shall be given to whether:</i></p> <p>(a) <i>The urban development contributes to establishing or maintaining the qualities of a well-functioning urban environment, including:</i></p> <p><i>(i) the urban development will be existing well connected to the or planned urban area, particularly if it is located along existing or planned transport corridors;</i></p> <p><i>(ii) the location, design and layout shall apply the specific management or protection values or resources identified for by this RPS, including:</i></p> <p><i>1. Avoiding inappropriate subdivision, use and development in areas at risk from natural hazards as required by Policy 29;</i></p>

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			<p><i>2. Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values as identified by Policy 23;</i></p> <p><i>3. Protecting outstanding natural features and landscape values as identified by Policy 25;</i></p> <p><i>4. Protecting historic heritage values as identified by Policy 22;</i></p> <p><i>5. Integrates Te Mana o Te Wai consistent with Policy 42;</i></p> <p><i>6. Provides for climate resilience and supports a low or zero carbon transport network consistent with Policies CC.1, CC.4, CC.10 and CC17.</i></p> <p><i>7. Recognises and provides for mana values of significance to whenua / tangata whenua;</i></p> <p><i>8. Protecting Regionally Significant Infrastructure as identified by Policy 8; and</i></p> <p><i>...”</i></p>
Policy 56	Amend	<p>Policy 56 lists a range of considerations for the management of development in rural areas.</p> <p>Matter (a) relates to impacts on productive land. This matter may well have been overtaken by the introduction of the NPS on Highly Productive Soils and could be removed pending GWRC giving effect to the NPS.</p>	<p>Amend the policy by:</p> <ul style="list-style-type: none"> Re-considering whether matter (a) remains necessary as currently worded given the introduction of the NPS on Highly Productive Soils;

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		<p>Matter (d) requires consideration of the consistency of a development with a Future Development Strategy or other growth strategy and is reflective of Policy 55 above. Matter (e) notes that in the absence of such a strategy consideration is required of the pressure development may put on existing services and infrastructure.</p> <p>While the policy mirrors Policy 55 in terms of reflecting consideration of growth strategies, it does not similarly reflect Policy 55 in considering ‘out of sequence’ development. Either the policy is intending to duplicate the matters in Policy 55 with respect to growth management in which case it should mirror all relevant aspects, or matters (d) and (e) should be removed and Policy 55 and UD.3 should be relied upon.</p>	<ul style="list-style-type: none"> ▪ Remove duplication, or ensure consistency, between policies 55, 56 and UD.3.
Policy 58	Oppose	<p>The policy requires that when considering proposals for new development, the “form, layout, location and timing of” all new development is sequenced in a way that:</p> <p style="padding-left: 40px;"><i>(a) the development, funding, implementation and operation of infrastructure serving the area in question is provided for; and</i></p> <p style="padding-left: 40px;"><i>(b) all infrastructure required to serve new development, including low or zero carbon, multi modal and public transport infrastructure, is available, or is consented, designated or programmed to be available prior to development occurring.</i></p> <p>The policy is not consistent with Objective 6(c) and Policy 8 of the NPS-UD relating to being responsive to proposals that would bring about significant development capacity. It is not always possible to achieve all of the matters listed in Policy 58.</p> <p>The policy is internally inconsistent with proposed Policy 57(e) of the RPS which recognises that the timing and sequencing of land use and public transport may result in a period where public transport may not be practical.</p>	Delete the policy, or amend the policy to achieve consistency with Objective 6(c) and Policy 8 of the NPS-UD.
Policy UD.3	Amend	Policy UD.3 lists a range of criteria which must be given particular regard when considering developments that provide for significant development capacity.	<p>Amend the policy by:</p> <ul style="list-style-type: none"> ▪ Making consequential amendments that reflect the relief sought in respect of Objective 22 and Policy 55 outlined above; or

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		<p>Matter (a)(i) references the “characteristics and qualities of a well-functioning urban environment” as identified in Policy 55(a)(ii) and Objective 22. These matters have been addressed above.</p> <p>It is unclear what is meant by matter (c)(iv) of the policy and this matter should be clarified or deleted.</p>	<ul style="list-style-type: none"> ▪ Deleting the words “identified in Policy 55(a)(ii) and Objective 22” from Policy UD.3(a)(i); ▪ Delete or clarify matter (c)(iv).