

17 February 2023

By Email: Jaskirat.kaur@wcc.govt.nz

Attention: Jaskirat Kaur, Hearings Administrator

Wellington City Council

Te Uru Rakau – New Zealand Forest Service
Forestry and Land Management
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HEARING STREAM 1: Strategic Direction, submission on behalf of Metlifecare Limited

1. Introduction

- 1.1 We act for Metlifecare Limited (**Metlifecare**).
- 1.2 Metlifecare made a submission on the Proposed Wellington District Plan (**Proposed Plan**). Its submission points on matters relevant to Hearing Stream 1: Strategic Direction primarily relate to the Strategic Direction labelled Urban Form and Development. Metlifecare also made a further submission supporting the submission of the Retirement Villages Association of New Zealand Incorporated (submission 350).
- 1.3 We ask that this letter be tabled before the Hearing Panel, in lieu of Metlifecare appearing at Hearing Stream 1.

2. Metlifecare's submission

- 2.1 As New Zealand's population grows and ages, the continued supply of retirement village housing will be crucial to ensure that the elderly population have suitable housing that meets their needs. Metlifecare, along with other aged care providers, need to expand existing villages and construct new developments in the short to medium term in order to provide additional capacity to meet the growing demand for aged care housing. Research from Business and Economic Research showed a need for New Zealand to build another 15,000 aged care beds by 2030 and another 24,500 retirement units by 2033.
- 2.2 In the Wellington context, the population 75 years and older is expected to increase by 21,590 people over the next 10 years,¹ and while not every older person wishes to live in a retirement village, it is important that they are given the choice and option to do so. Although there are several retirement villages in the development pipeline in the capital, demand is still exceeding supply.
- 2.3 Metlifecare's key concern in relation to the Urban Form and Development Strategic Direction in the Proposed Plan is that there is no explicit reference to retirement villages, the role that they have in housing the elderly community, and the functional and operational needs of retirement villages. Without this recognition in the strategic provisions in the Proposed Plan, there is a risk that the differences between standard residential development and retirement village development will not be adequately recognised and provided for where appropriate in the Proposed Plan rules, and therefore not enabled as an important form of residential development.
- 2.4 Metlifecare seeks to highlight the following:
 - (a) Retirement villages are communities specifically designed to cater to the needs and lifestyles of older people who are some of the most vulnerable members of the community. They

¹ JLL New Zealand Retirement Villages and Aged Care White Paper, July 2022.

provide residents with numerous social and health benefits, for example, they lead to greater social interaction and more opportunities for companionship for older people.

- (b) The local community benefits from the provision of retirement villages. For example, they release pressure on social and health services and contribute to employment in New Zealand, both in the construction sector and day-to-day operations.
- (c) Most notably, retirement villages have a crucial role in the general housing market – the supply of retirement village housing releases existing housing stock into the market. It frees up existing housing and potentially creates opportunities for more intensive use of that housing. For example, large family homes which might have been occupied by one or two people are freed up for new and larger families when their occupants move into retirement villages.
- (d) Retirement villages also reduce pressure on existing infrastructure. Retirement villages are self-contained in terms of the recreational and community facilities which are provided by and funded by the retirement village. Retirement villages also generate less traffic, as residents have lower average car ownership (either due to resident mobility constraints or access to services on site). Therefore, they have lower demand on council services and lower usage of public assets compared to the demand and use from standard residential development.
- (e) Retirement villages are a residential use, however they are a residential use that has specific functional and operational needs. It is therefore important that this use is specifically recognised and enabled in the Proposed Plan.

3. Comment on the section 42A

3.1 Definition of “retirement village” (submission points 413.2-3)

3.2 In its submission Metlifecare sought to clarify that retirement villages provide retirement accommodation for people who are “predominately” retired, not just retired.

3.3 The section 42A recommendation is to retain the existing definition of retirement villages on the basis that it is consistent with the definition in the National Planning Standards.

3.4 Metlifecare recognises the importance of being consistent with the National Planning Standards, and has no further comments on this submission point.

3.5 Introduction to Urban Form and Development section (submission point 413.4)

3.6 Metlifecare sought amendments to the introduction in the Urban Form and Development section. The primary issue identified is population growth resulting in a higher demand for housing in circumstances where capacity modelling shows that this demand is unlikely to be met. Metlifecare sought the following amendments to the introduction of the Urban Form and Development section:

“Enabling sufficient land supply for housing and business activity is crucial for the ability of residents to meet their social, economic, environmental, and cultural well-being. The National Policy Statement on Urban Development requires the Council to provide sufficient development capacity to meet expected demand for housing and business land over the short (3 years), medium (3-10 years), and long term (10-30 years). This District Plan sets the policy foundation to enable growth to be accommodated beyond the life of the Plan. Particular consideration also needs to be given to the growing demand for housing for the elderly, including retirement villages. The demand for retirement village housing is increasing as more New Zealanders are choosing to live in retirement villages, enjoying the range of facilities, housing options, activities, and social and health benefits on offer which are able to suit the needs of older people in the community.”

...

The District Plan approach is to increase housing choice and affordability by enabling development across the housing spectrum – from assisted housing solutions through to private home ownership. In doing so, the District Plan must recognise and provide for the functional and operational requirements of these different types of housing solutions, including retirement villages.

- 3.7 The section 42A recommendation is to amend the introduction of the chapter but with reference to a variety of housing typologies including standalone, terraced, attached and apartments, not only retirement villages.

The District Plan approach is to increase housing choice and affordability by enabling development across the housing spectrum – from assisted housing solutions through to private home ownership. It provides for a variety of housing types across the city including standalone, terraced, attached, retirement villages and apartment buildings.

- 3.8 Metlifecare partly supports the recommended amendments set out in the section 42A report. However, it remains concerned that the introduction does not explicitly recognise the demand for and crucial role that retirement and aged care facilities have in providing for the health and wellbeing of the New Zealand community and the provision of housing for elderly residents.

- 3.9 This was recognised by the evidence filed by Ryman and the RVA which supports:

- (a) the view that it is important to have specific guidance in the Strategic Direction provision. “[T]here are a number of challenges in finding suitable sites for the development of new retirement villages given the size of the sites that are typically required (which generally need to provide a range of living and care options, as well as on-site amenities), and the desire of prospective residents to remain close to their families and existing communities”.²

- 3.10 In Metlifecare’s view, further amendments are required in accordance with Metlifecare’s submission, including to provide appropriate recognition of and support for housing for the elderly in the objectives (and not just the introduction without any support in the operative provisions).

- 3.11 Amendments to Objective 6 (UDF-O6) or an alternative objective (submission points 413.5-7)

- 3.12 Metlifecare sought the following amendment to UDF-O6:

A variety of housing types, sizes and tenures, including assisted housing, supported residential care, and papakainga options, are available across the City to meet the community's diverse ~~social, cultural, and economic~~ housing needs and to reflect demand.

- 3.13 Alternatively, Metlifecare sought a new strategic objective that “the housing and care needs of the ageing population are recognised and provided for across the City to meet demand.”

- 3.14 The section 42A report disagreed with Metlifecare’s amendment (with no reasons provided) and also recommends that a new objective is not required. The author of the s42A report considered that the objectives of the chapter sufficiently address the diverse housing needs of different demographic groups including an aging population.

- 3.15 Metlifecare disagrees with this recommendation on the basis that UDF-O6 unnecessarily limits the range of housing needs that are to be considered. By way of example, health needs are just as important as social, cultural and economic needs. It is also considered that consideration should be given to the demand for a particular type of housing. If the Panel is of the view that UDF-O6 should be a broad objective, Metlifecare considers (and is its preference) that an additional specific objective is provided to recognise the housing and care needs of the aging population as sought above. This is justified and appropriate given the pending crisis for aged care housing in the capital.

² Statement of Evidence of Phil Mitchell, dated 7 February 2023, at [18].

- 3.16 Evidence filed by Ryman and the RVA supports the position that “further amendments to the strategic framework provisions are warranted in order to provide a planning framework that appropriately gives effect to the NPS-UD, responds to the retirement housing and care shortage, and enables a consistent approach across the country.”³
- 3.17 Without these amendments the strategic provisions will not respond to the retirement housing shortage and appropriately recognise and enable this specific form of development in the Proposed Plan.
- 3.18 If you have any queries regarding Metlifecare’s submission, please let us know.

Yours faithfully
MinterEllisonRuddWatts



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³ Statement of Evidence of Phil Mitchell, dated 7 February 2023, at [64].