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## Submission on Napier City Proposed District Plan

### Form 5 Submission on publically notified proposal for policy statement or plan, change or variation

*Clause 6 of Schedule 1, Resource Management Act 1991*

**To:** Napier City Council - Planning Unit

**Date received:** 13/12/2023

**Submission Reference Number #:**103

This is a submission on the following proposed plan (the **proposal**): Napier City Proposed District Plan

**Submitter:**

Summerset Group Holdings Limited

**Address for service:**

Summerset Group Holdings Limited Summerset Group Holdings Limited  
Summerset Group Holdings Limited  
level 12, 23 Customs Street East Auckland 1140  
New Zealand

**Email:** cmcgarr@bentley.co.nz

**Attachments:**

Summerset Submission Napier Proposed District Plan.pdf

**I wish to be heard:** Yes

**I am willing to present a joint case:** Yes

Could you gain an advantage in trade competition in making this submission?

- **No**

Are you directly affected by an effect of the subject matter of the submission that

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition

- **Yes**

### Submission points

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**Point 103.1**

**Section:** GRZ - General Residential Zone

**Sub-section:** Issues

**Sentiment:** Amend

**Submission:**

refer primary Summerset submission attachment

**Relief sought**

refer primary Summerset submission attachment

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**Point 103.2**

**Section:** GRZ - General Residential Zone

**Sub-section:** Objectives

**Sentiment:** Amend

**Submission:**

refer primary Summerset submission attachment

**Relief sought**

refer primary Summerset submission attachment

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**Point 103.3**

**Section:** GRZ - General Residential Zone

**Sub-section:** Policies

**Sentiment:** Amend

**Submission:**

refer primary Summerset submission attachment

**Relief sought**

refer primary Summerset submission attachment

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**Point 103.4**

**Section:** GRZ - General Residential Zone

**Sub-section:** GRZ - General Residential Zone - Standards Table

**Sentiment:** Amend

**Submission:**

refer primary Summerset submission attachment concerning deletion of application of the following standards for retirement villages

- Residential outlook space;
- Minimum residential unit size;
- Outdoor living space;
- Windows to the street;
- Landscaped area;
- Maximum building length.

**Relief sought**

refer primary Summerset submission attachment concerning deletion of application of the following standards for retirement villages

- Residential outlook space;
  - Minimum residential unit size;
  - Outdoor living space;
  - Windows to the street;
  - Landscaped area;
  - Maximum building length.
- 

**Point 103.5**

**Section:** GRZ - General Residential Zone

**Sub-section:** Assessment criteria

**Provision:**

GRZ-AC1: Residential units (GRZ-R1); Minor residential units (GRZ-R3); Relocated buildings (GRZ-R9); Retirement village premises (GRZ-R10)

*General*

- a. The extent to which the site layout (location and design of buildings, access/car parking and open spaces) optimises the quality of the living environment and the safety and attractiveness of streets and public open spaces by addressing each of the criteria below.

*Neighbourhood character*

- b. The extent to which development is consistent with planned built form and any positive defining characteristics of the neighbourhood development. This includes consideration of any character, amenity values, and heritage values identified for the area in the character statements at Schedule 4, and any coastal environment values.
- c. The extent to which the development is consistent with the Hastings Residential Intensification Design Guide.

*Safety, attractiveness, and connectivity of streets and public open space*

- d. For developments on larger sites with frontages to two or more streets, whether connectivity is achieved to the surrounding neighbourhood.
- e. Whether the development contributes to attractive streets and public open spaces. This includes orientating residential

- units to front the street with clear and direct pedestrian access and minimising long expanses of blank walls.
- f. Whether the orientation of development and the placement of doors, windows, balconies, and habitable rooms maximise visibility over the street and public open space to enhance safety and security.
- g. The extent to which the development is consistent with the Hastings Residential Intensification Design Guide.

### Quality living environments

- h. The extent to which the site layout and residential unit design contributes to a warm, dry, and healthy living environment for residents.
- i. Whether the site layout and residential unit design maintains a reasonable level of privacy for residents.
- j. The extent to which the site layout and residential unit design contribute to a reasonable noise environment for residents, particularly to enable uninterrupted sleep.
- k. Whether the entranceway is well lit and shelter is provided from the rain at the front door.
  - l. Whether residents, visitors, and emergency services can easily find and access the residential unit.
- m. Whether the site layout provides for easy storage and access of recycling and rubbish for collection.
- n. Whether communal collection areas will detract from the quality of the living environment, particularly for adjoining residents, and/or the safety and attractiveness of the street and public open spaces.
- o. The extent to which outdoor living spaces are useable by residents and contribute to a healthy living environment.
- p. Whether parking is safe and accessible for residents.
- q. Whether the layout of residential units provides sufficient room for the day-to-day needs of residents, including space for both furniture and internal circulation.
- r. Whether sufficient area is available for easily accessible and identifiable letter boxes.
- s. The extent to which the development is consistent with the Hastings Residential Intensification Design Guide.

**Sentiment:** Amend

**Submission:**

refer primary Summerset submission attachment

**Relief sought**

refer primary Summerset submission attachment

## Point 103.6

**Section:** GRZ - General Residential Zone

**Sub-section:** GRZ - General Residential Zone - Rules Table

**Provision:**

GRZ-R10: Retirement village premises

**Activity Status:** Restricted Discretionary

NA

**Matters of discretion are:**

1. Housing supply and diversity;
2. Neighbourhood character;
3. Safety, attractiveness, and connectivity of streets and public open spaces;
4. Quality living environments, and
5. Infrastructure capacity and stormwater management.

**Sentiment:** Amend

**Submission:**

refer primary Summerset submission concerning preclusion for notification

**Relief sought**

refer primary Summerset submission concerning preclusion for notification

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**Point 103.7**

**Section:** MRZ - Medium Density Residential Zone

**Sub-section:** Objectives

**Sentiment:** Amend

**Submission:**

refer primary Summerset submission attachment

**Relief sought**

refer primary Summerset submission attachment

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**Point 103.8**

**Section:** MRZ - Medium Density Residential Zone

**Sub-section:** Policies

**Sentiment:** Amend

**Submission:**

refer primary Summerset submission attachment

**Relief sought**

refer primary Summerset submission attachment

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**Point 103.9**

**Section:** MRZ - Medium Density Residential Zone

**Sub-section:** MRZ - Medium Density Residential Zone - Rules Table

**Provision:**

MRZ-R6: Retirement village premises

**Activity Status:** Restricted Discretionary

NA

**Matters of discretion are:**

1. Housing supply and diversity;
2. Safety, attractiveness, and connectivity of streets and public open spaces;
3. Quality living environments, and
4. Infrastructure capacity and stormwater management.

**Sentiment:** Amend

**Submission:**

refer Summerset primary attachment re notification preclusion

**Relief sought**

refer Summerset primary attachment re notification preclusion

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**Point 103.10**

**Section:** MRZ - Medium Density Residential Zone

**Sub-section:** MRZ - Medium Density Residential Zone - Standards Table

**Sentiment:** Amend

**Submission:**

refer primary Summerset submission attachment concerning deletion of application of the following standards for retirement villages

- Residential outlook space;
- Minimum residential unit size;
- Outdoor living space;
- Windows to the street;
- Landscaped area;
- Maximum building length.

**Relief sought**

refer primary Summerset submission attachment concerning deletion of application of the following standards for retirement villages

- Residential outlook space;
  - Minimum residential unit size;
  - Outdoor living space;
  - Windows to the street;
  - Landscaped area;
  - Maximum building length.
- 

**Point 103.11**

**Section:** MRZ - Medium Density Residential Zone

**Sub-section:** Assessment criteria

**Provision:**

MRZ-AC1: Residential units (MRZ-R1); Relocated buildings (MRZ-R5); Retirement village premises (MRZ-R6)

*General*

- a. The extent to which the site layout (location and design of buildings, access/car parking, and open spaces) optimises the quality of the living environment and the safety and attractiveness of streets and public open spaces, by addressing each of the criteria below.

*Housing supply and diversity*

- b. The extent to which the development makes efficient use of the site and contributes to diversity of housing options in Napier.

*Safety, attractiveness, and connectivity of streets and public open space*

- c. For developments on larger sites with frontages to two or more streets, whether connectivity is achieved to the surrounding neighbourhood.
- d. Whether the development contributes to attractive streets and public open spaces. This includes orientating residential units to front the street with clear and direct pedestrian access and minimising long expanses of blank walls.
- e. Whether the orientation of development and the placement of doors, windows, balconies, and habitable rooms maximise visibility over the street and public open space to enhance safety and security.
- f. The extent to which the development is consistent with the Hastings Residential Intensification Design Guide.

*Quality living environments*

- g. Whether principal living rooms and outdoor living spaces are orientated and designed to provide privacy between residential units and optimise sunlight access.
- h. The extent to which outdoor living spaces are directly accessible from the principal living room.
- i. Whether landscaped areas can be consolidated to allow opportunities for large scale trees on site, contribute to the overall quality of outlook space and allow some privacy between residential units.
- j. Where communal open space is provided on site, whether it is located to provide convenient access for all residents and to maximise sunlight access, amenity, and use.
- k. Whether storage areas for rubbish are sufficiently sized, conveniently located, and appropriately screened.
- l. The extent to which the site layout and residential unit design contributes to a reasonable noise environment for residents, particularly to enable uninterrupted sleep.
- m. Whether the site layout provides for easy storage and access of recycling and rubbish for collection.
- n. Whether communal collection areas will detract from the quality of the living environment, particularly for adjoining residents, and/or the safety and attractiveness of the street and public open spaces.
- o. The extent to which outdoor living spaces are useable by residents and contribute to a healthy living environment.
- p. Whether parking is safe and accessible for residents.
- q. Whether the layout of residential units provides sufficient room for the day-to-day needs of residents, including space for both furniture and internal circulation.
- r. The extent to which the development is consistent with the Hastings Residential Intensification Design Guide.

**Sentiment:** Amend

**Submission:**

refer primary Summerset submission attachment

**Relief sought**

refer primary Summerset submission attachment

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**Point 103.12**

**Section:** MRZ - Medium Density Residential Zone

**Sub-section:** Issues

**Sentiment:** Amend

**Submission:**

refer primary Summerset submission attachment

**Relief sought**

refer primary Summerset submission attachment

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**Point 103.13**

**Section:** GRZ - General Residential Zone

**Sub-section:** Introduction

**Sentiment:** Amend

**Submission:**

refer primary Summerset submission attachment

**Relief sought**

refer primary Summerset submission attachment

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**Point 103.14**

**Section:** MRZ - Medium Density Residential Zone

**Sub-section:** Introduction

**Sentiment:** Amend

**Submission:**

refer primary Summerset submission attachment

**Relief sought**

refer primary Summerset submission attachment

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**Point 103.15**



**Section:** HRZ - High Density Residential Zone

**Sub-section:** Introduction

**Sentiment:** Amend

**Submission:**

refer primary Summerset submission attachment

**Relief sought**

refer primary Summerset submission attachment

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**Point 103.16**

**Section:** HRZ - High Density Residential Zone

**Sub-section:** Issues

**Sentiment:** Amend

**Submission:**

refer primary Summerset submission attachment

**Relief sought**

refer primary Summerset submission attachment

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**Point 103.17**

**Section:** HRZ - High Density Residential Zone

**Sub-section:** Objectives

**Sentiment:** Amend

**Submission:**

refer primary Summerset submission attachment

**Relief sought**

refer primary Summerset submission attachment

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**Point 103.18**

**Section:** HRZ - High Density Residential Zone

**Sub-section:** Policies

**Sentiment:** Amend

**Submission:**

refer primary Summerset submission attachment

**Relief sought**

refer primary Summerset submission attachment

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**Point 103.19**

**Section:** HRZ - High Density Residential Zone

**Sub-section:** HRZ - High Density Residential Zone - Rules Table

**Provision:**

HRZ-R6: Retirement village premises

**Activity Status:** Restricted Discretionary

NA

**Matters of discretion are:**

1. Housing supply and diversity;
2. Urban character;
3. Safety, attractiveness, and connectivity of streets and public open spaces;
4. Quality living environments;
5. Effects on adjoining sites, and
6. Infrastructure capacity and stormwater management.

**Sentiment:** Amend

**Submission:**

refer primary Summerset submission attachment concerning notification preclusion

**Relief sought**

refer primary Summerset submission attachment concerning notification preclusion

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**Point 103.20**

**Section:** HRZ - High Density Residential Zone

**Sub-section:** HRZ - High Density Residential Zone - Standards Table

**Sentiment:** Amend

**Submission:**

refer primary Summerset submission attachment concerning deletion of application of the following standards for retirement

villages

- Residential outlook space;
- Minimum residential unit size;
- Outdoor living space;
- Windows to the street;
- Landscaped area;
- Maximum building length.

**Relief sought**

refer primary Summerset submission attachment concerning deletion of application of the following standards for retirement villages

- Residential outlook space;
  - Minimum residential unit size;
  - Outdoor living space;
  - Windows to the street;
  - Landscaped area;
  - Maximum building length.
- 

**Point 103.21**

**Section:** HRZ - High Density Residential Zone

**Sub-section:** Assessment criteria

**Sentiment:** Amend

**Submission:**

refer primary Summerset submission attachment

**Relief sought**

refer primary Summerset submission attachment

13 December 2023

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**RE: Submission on Proposed Napier District Plan**

**Introduction**

This is a submission on behalf of Summerset Group Holdings Limited (Summerset) on the Proposed Napier District Plan.

Summerset is one of New Zealand's leading and fastest growing retirement village operators, with more than 7,600 residents living in their village communities. Summerset offer a range of independent living options and care, meaning that as residents' needs change, they have support and options within the village. Summerset has 42 villages which are either completed or in development, spanning from Whangārei to Dunedin. Summerset employ over 2,500 staff members across their various sites.

Summerset could not gain advantage in trade competition through this submission.

Summerset does wish to be heard in support of its submission.

If others are making a similar submission, Summerset would consider presenting a joint case with them at the hearing.

**Background**

As identified in the executive summary of the Retirement Village Sector Housing Demand Forecasts 2023 – 2053 Report for the Heretaunga Plains Future Development Strategy (May 2023):

*The New Zealand/Hawke's Bay population is undergoing a fundamental compositional change as a growing percentage of the population passes into retirement age. Within the next 30 years the number of people aged 65+ will increase by 60%; those aged over 75 will double; and the number of people aged 90+ will more than treble. This trend will also continue and intensify beyond the 30-year projection period.*

*...we predict a future demand for 2,450 more retirement village-based independent-living units (villas and apartments) between now and 2053. That will translate into a*

*demand for about 80 units per annum and new entire retirement villages, averaging 200 units, being built at a rate of one every two-and-half years for the next 30 years.*

*Each of these future villages is liable to require at least 6 hectares and the total future land requirement will be between 60 and 98 hectares, depending on what housing-densities can be achieved. Current gross densities are typically around 25 units/ha but can get as high as 37/ha and we predict that 30/units will be a reasonable future target. If so then 82 hectares will be the total required space.*

*Future retirement villages will generally (as now) seek to establish on greenfield sites. Villages typically require an area of about 6 hectares or more and so it is very difficult to find suitable sites within the existing urban boundary.*

*There will also be an accelerating demand for village-based rest-home and hospital-level care facilities. Most (but not all) larger retirement villages have care facilities and there is currently an overall average of about 1 care-bed per 2 independent-living units. The growth in demand for care-beds will increase at an even faster rate than for regular dwellings due to the disproportionate growth of the even-older (85+) age bracket. To merely keep pace with this growth, at existing service levels, will require an estimated 2,257 more care-beds by 2053.*

*We expect, however, that most of the growth in demand for care-beds in future retirement villages (if provided for) will continue to be mainly accommodated in multi-level care facilities and that this particular growth component will not, therefore, substantially add to overall future land demand.*

Relative to the above, the demand for retirement village accommodation outstrips supply. The ageing population and longer life expectancy, coupled with a trend towards people wishing to live in retirement villages that provide purpose-built accommodation, means that demand is continuing to grow.

The release of family homes back into the housing market annually through new retirement village builds represents a significant contribution to easing the chronic housing shortage. For example, a large scale village can typically release approximately 300 houses/sites back onto the market to be more efficiently used.

Napier City Council is a Tier 2 Territorial Authority. Policy 5 of the National Policy Statement on Urban Development 2020 (NPSUD) requires district plans of tier 2 urban environments to enable density of urban form commensurate with the greater of the level of accessibility or relative demand for housing and business.

The NPSUD recognises that well-functioning Urban Environments require a “variety of homes” to meet the needs of different households (Policy 1). It also requires that “New Zealand’s Urban Environments, including their amenity values, develop and change over time

in response to the diverse and changing needs of people, communities, and future generations” (Objective 4). Further, the NPSUD recognises that amenity values can differ among people and communities and also recognises that changes can be made via increased and varied housing densities and types (Policy 6).

Summerset considers the Proposed District Plan can better align with the NPSUD in providing for a range of housing types, including the specific needs of older persons in a way which is more enabling, relative to the characteristics and requirements of retirement village activities through intensification opportunities in the existing urban environment, as well providing the opportunity for such a form of development/activity through urban growth through rezoning, or at least to facilitate that by identifying greenfield land that is suitable for urban development by providing for a ‘Future Urban Zone’ framework.

### **Submission**

Summerset supports the restricted discretionary activity classification for ‘Retirement village premises’ in the General, Medium, and High Density Residential zones.

While Summerset supports the activity status for retirement villages, it is concerned that in its current form the way that the residential zone provisions are framed fails to appropriately distinguish and recognise the functional and operational attributes of retirement villages, relative to:

- the standards which apply in the respective zones for residential units (inclusive of retirement village units);
- the assessment matters/criteria for restricted discretionary activities;
- the objective and policy framework.

It is not appropriate or desirable for retirement villages to be subject to the same assessment matters/criteria as general residential developments, which exceed one unit per site, or for retirement villages to be subject to the same ‘standards’ that apply to residential units – for any of the residential zones. The application of these provisions (or the lack of retirement village specific provisions) will result in unnecessary debate as to the applicability and suitability of such provisions when progressing an application for resource consent.

The section 32 assessment and associated material do not explain why there is no distinction between the standards and assessment matters/criteria that apply to standard residential development and retirement villages.

Retirement villages have unique characteristics and benefits that merit specific standards (or exclusions from the residential standards) and a specific assessment framework, which also recognises that such developments are often located on large sites which can provide for the amenities of the retirement village residents in a manner that is distinctly different to that of a standard residential dwelling.

The respective introductions, issues, objectives and policies of the residential zones do not acknowledge the significance of retirement villages (which are a specifically listed restricted discretionary activity) as a significant accommodation/housing typology that contributes to the provision of a diverse range of housing demands (including integrated care), and community wellbeing, and which serves to provide a large proportion of the demand for housing both directly and indirectly (through freeing up land vacated by the elderly population when moving into a retirement village).

Summerset considers that additional recognition and specific objectives and policies are needed to address the NPSUD and better enable the provision of a diverse range of retirement housing and care options in the District. This can be most appropriately achieved by a retirement-village specific objective, policy and rule framework for each of the residential zones.

Such objectives and policies need to recognise the need for change over time to the existing character and amenity of neighbourhoods to provide for the diverse and changing needs of the community; along with recognising the need to provide for a range of housing and care options for older people, and the unique functional and operational needs of retirement villages.

With provision made for retirement villages as a restricted discretionary activity in the Proposed Plan's residential zones, the matters of discretion (and corresponding assessment criteria) need to be clear and focused on the effects of retirement villages, while providing for the efficient use of larger sites and for the functional and operational needs of retirement villages to be taken into account when assessing effects. They should also recognise the positive effects of retirement villages. Such provisions should be distinct and separate to those applied to the consideration of multi-unit residential development.

In terms of the proposed residential standards, those specific to individual residential units are not appropriate to be applied to retirement village units, which are designed and developed comprehensively to provide for the amenity of the residents, including provision for communal amenities, rather than being 'unit' specific. For example, the following standards are not practically applicable to retirement village units, with the outcomes these provisions are seeking to achieve (for residential dwellings) addressed through the integrated design of a retirement village – relative to the day to day needs of the residents, and the functional and operational requirements of the activity, rather than needing to be prescribed:

- Residential outlook space;
- Minimum residential unit size;
- Outdoor living space;
- Windows to the street;
- Landscaped area;
- Maximum building length.

Correspondingly, retirement village activities should be excluded from complying with such standards.

The Proposed Plan provides for multi-unit residential development to be precluded from being notified on a public or limited basis. No such provision is made for retirement village activities. There is no section 32 evaluation for this distinction, and it is unclear why a retirement village activity, which is proposed to be subject to the same matters of discretion/assessment criteria should be treated differently, particularly noting that retirement village activities of a similar unit density to a residential dwelling development will be occupied with a lesser intensity, generate significantly less traffic movements, and typically places less demand on community infrastructure.

Correspondingly, retirement village activities should be precluded from being notified on a public or limited basis.

### **Decision Sought**

Summerset seek:

- The relief set out above throughout this submission;
- Any alternative or consequential relief to address Summerset's concerns, including amendments or deletion of any objectives, policies and standards to appropriately enable resource consent for retirement villages in the Napier City District Plan to be sought in an efficient manner;
- Such further, alternative or other consequential amendments to other Plan provisions, as may be necessary to fully give effect to the relief sought in this submission.

Summerset wishes to be heard in support of its submission.

If others make a similar submission, Summerset will consider presenting a joint case with them at a hearing.

Dated this 15<sup>th</sup> day of December 2023.



**Craig McGarr**  
**Planning Consultant for Summerset Group Holdings Limited**

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