

**Metlifecare**

**Submission on Private Plan Change 13 - Te Rapa Racecourse Medium Density Residential Precinct**

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**Submission Information:**

Metlifecare could not gain an advantage in trade competition through this submission.

The specific provisions of Private Plan Change 13 (PPC13) that Metlifecare's submission relates to are attached.

Metlifecare supports/opposes/seek amendment to the specific provisions as listed in the attached document. The reasons are provided in the attached document.

The decisions Metlifecare wishes Council to make are contained in the attached document.

Metlifecare wishes to be heard in support of this submission.

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

Regards,



Matt Norwell



Marne Lomas

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## 1.0 Introduction

Metlifecare welcomes the opportunity to provide this submission on Private Plan Change 13 (PPC13) as prepared by Bloxam Burnett & Olliver ('BBO').

### 1.1 Background

The site ('site') located at 2 Minogue Drive is a retirement village owned by Metlifecare known as "Forest Lake Gardens" and it is 5.5677ha in area (Legal Description Part Lot 1 Deposited Plan 311765 and Section 3 Survey Office Plan 318174 and Lot 5 Deposited Plan 443687), populated with serviced units and apartments which overlook the Te Rapa Racecourse (being the subject of PPC13).

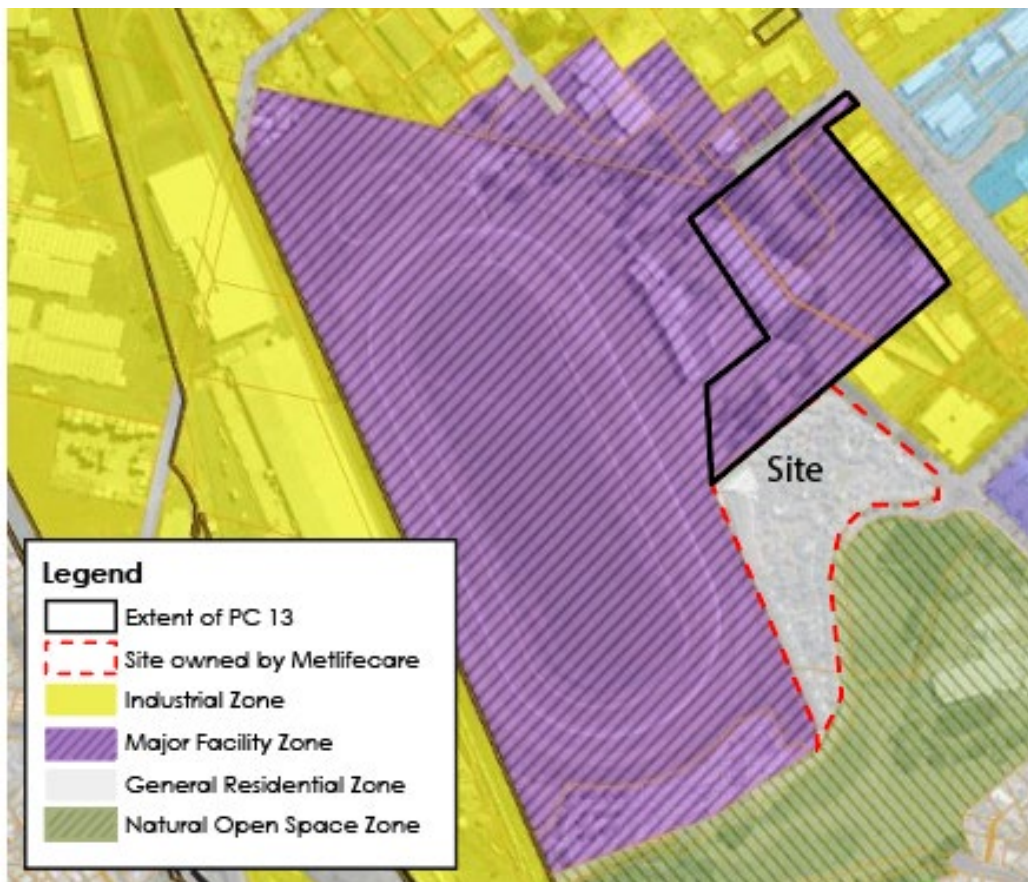
Metlifecare provide aged care facilities, mostly retirement villages, across New Zealand. Different sites provide different levels of care, ranging from independent living, aged care, dementia care and other assisted living situations. Each site is unique and sympathetic to its surrounding environment. In the case of the Forest Lake Gardens village, the site is exclusively independent living. Currently, this Metlifecare site has no connectivity or integration with the adjoining Te Rapa Racecourse site.

The Te Rapa Racecourse itself is located directly to the west of the site, and the area subject to PPC 13 is located to the north of the site (being the area of the Racecourse that comprises the equine servicing area with stables, open spaces, and other ancillary activities, shown in Figures 1 and 2 below).

The site is currently zoned General Residential while the adjoining Te Rapa Racecourse is currently zoned Major Facilities Zone. Figures 1 and 2 below show the relationship between the site and the area subject to PPC 13 ('PPC13 area').



**Figure 1: Locality Map showing Metlifecare site and Te Rapa Racecourse**



**Figure 2: Current Zoning Map for Metlifecare site & Extent of PPC 13**

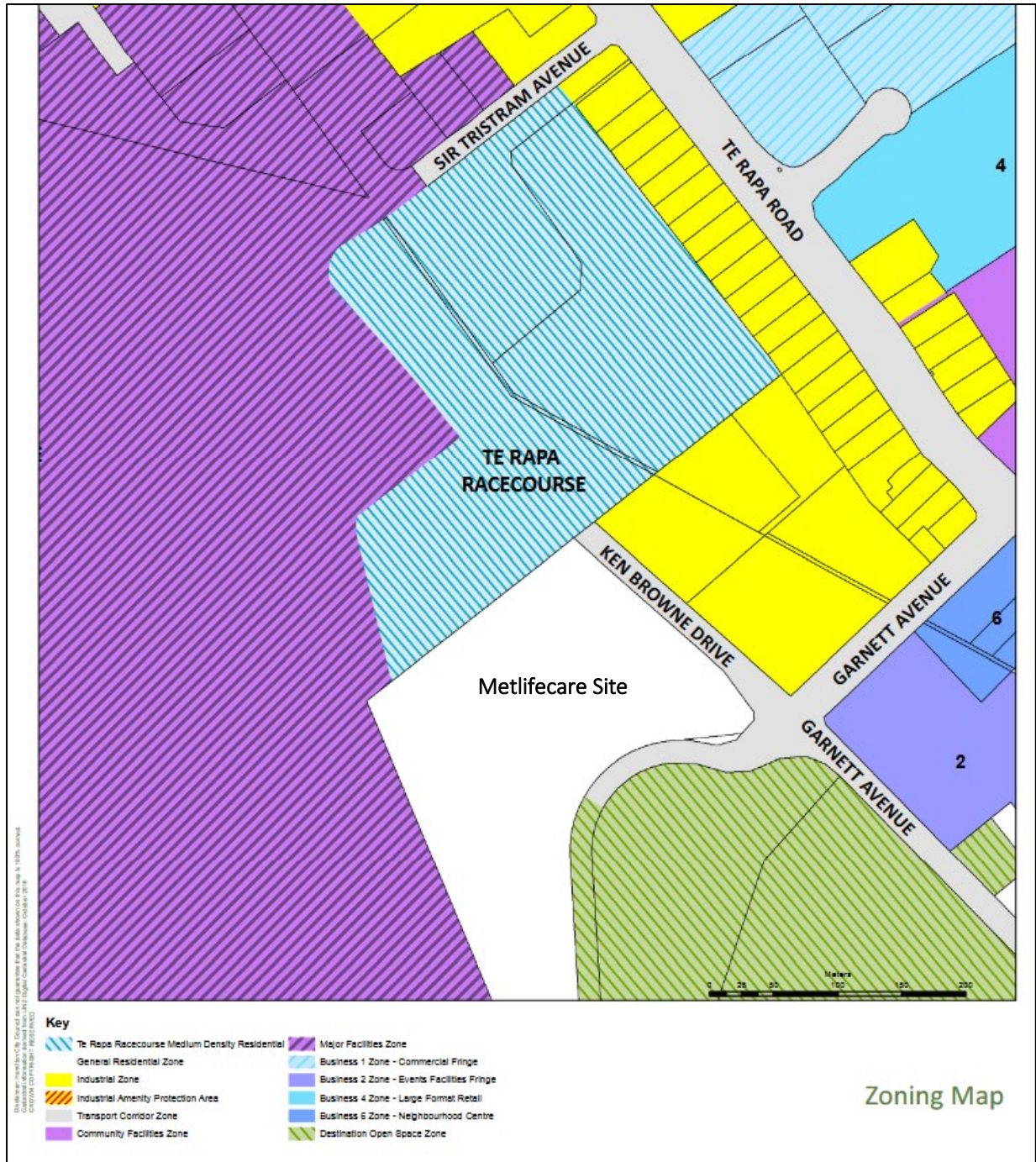
The PPC13 seeks:

- (a) to change part of the Te Rapa Racecourse site to Medium Density Residential Zone (**MDRZ**) and a small part of it to Industrial Zone.
- (b) to apply a new precinct, known as the Te Rapa Racecourse Medium Density Precinct to the land within the PPC13 area.

Figure 3 below shows the proposed zoning and Figure 4 is the Te Rapa Racecourse Medium Density Precinct Plan to be included as part of PPC13.

Metlifecare has also lodged a submission on PC12 to the Hamilton District Plan seeking that the Forest Lake Gardens site be rezoned from General Residential zone to Medium Density Residential zone.





**Figure 3: Proposed Zoning Map under PPC 13**



Figure 4: Medium Density Residential Precinct Plan



## 2.0 General Relief

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Metlifecare appreciates the opportunity to submit on PPC13 to ensure consistency and viability for future growth and development within the proposed Te Rapa Racecourse Medium Density Precinct. The general intention and purpose of this submission are to ensure PPC13 is consistent with the objectives of the higher-level strategic planning documents and the purpose of the Resource Management Act 1991 ('RMA').

Metlifecare's relief seeks to ensure that the PPC13 area becomes a high-quality urban environment that is cohesive and sympathetic to the adjoining retirement village. Metlifecare's submission generally relates to the following matters:

1. PPC13 is appropriately amended to incorporate a residential zone that provide for a range of housing, inclusive of rest home and retirement village development.
2. Protection, maintenance and enhancement of the existing and proposed natural environments.
3. PPC13 is consistent with other relevant plan changes, such as PC12 and the MDRS standards in the MDRZ.
4. PPC13 is consistent with national planning documents, specifically the National Policy Statement for Urban Development, National Policy Statement for Freshwater Management and National Policy Statement for Indigenous Biodiversity.

## 3.0 Conclusion

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In conclusion, Metlifecare seeks the following relief:

- a) Metlifecare's general relief in Section 2.0 and specific relief in Section 4.0 is addressed and necessary changes are incorporated.
- b) Any further or consequential amendments required to achieve (a) above.

Metlifecare looks forward to working collaboratively with BBO to address the above relief and is happy to meet with HCC policy staff or consultants to work through these matters.

## 4.0 Submission on Private Plan Change 13

Sub Heading	Section #	Support/Oppose/Seek Amendment/Explanation/Clarification	Comments/Reasons	Relief Sought (or amendments to similar effect)
<b>Section 4 - Residential Zones</b>				
Te Rapa Racecourse Medium-Density Residential Precinct	4.2.15 & 4.2.15a-d	Support Amendment with	Overall, Metlifecare supports this objective and subsequent policies in general, except for reference to 3-5 storey buildings. The policies state that the Precinct will be consistent with the MDRS and needs to be high-quality development, therefore reference to building storey size is irrelevant. Policies already outline how to achieve the objective, whilst having/encouraging 3-5 storey buildings is one way of contributing to the compact urban form, it is not suitable to reference specific bulk and mass scales in the objective. These should be addressed and covered in the relevant rules and standards.	<p><i>"The Te Rapa Racecourse Medium-Density Residential Precinct provides for a variety of housing types and sizes that respond to;</i></p> <p><i>a. <u>Changing and diverse housing needs and demand</u>; and</i></p> <p><i>b. <u>The neighbourhood's planned urban built character, including 3 to 5 storey building.</u>"</i></p>
	4.2.16 & 4.2.16a-e	Support Amendment with	Metlifecare supports proposed high amenity, connected developments in the Precinct. The policies to integrate the Precinct with the site, along the southern boundary, is consistent with development outcomes sought by Metlifecare. However, an amendment is sought to ensure any future development integrates with not only the Racecourse but also the other existing uses, including the Metlifecare site and other adjoining aged	<p><i>4.2.16d "Development is designed to minimize reverse sensitivity effects on the adjacent industrial area, <del>and the racecourse,</del> <u>rest home and retirement village.</u>"</i></p> <p><i>4.2.16e "Development integrates with and connects to the racecourse <del>and</del> existing <u>rest home and retirement village, and residential development on the southern boundary.</u>"</i></p>

			care facilities such as Foxbridge retirement village to the southwest.	
	Explanation of Objective 4.2.15-16	Support Amendment with	The adjoining Metlifecare site is used as a rest home and retirement village, which is not always considered to be a typical residential activity. Therefore, Metlifecare seeks that its facilities be specifically mentioned to ensure the activity can be appropriately integrated with the proposed precinct and also to ensure that any potential reverse sensitivity effects are appropriately managed.	<p><i>“...The purpose of the Precinct is to create a high-quality medium density residential development. It will support a walkable community with multi-modal transport options. It integrates with the <u>existing rest home, retirement village and residential development adjacent to the racecourse on Minogue Drive and Ken Browne Drive.</u></i></p> <p><i>The Te Rapa Racecourse Medium Density Residential Precinct Plan spatially manages the layout of the area, applying place-based provisions, including setbacks to manage reverse sensitivity effects of adjacent industrial land, <u>rest home and retirement village</u>, a roading layout to discourage through traffic, and a development layout to maintain a relationship with the racecourse as an amenity and recreational feature...”</i></p>
Activity Status Table – MDRZ	4.5.4	Support	Metlifecare supports the changes proposed to the MDRZ activity status table as a whole but specifically supports the Restricted Discretionary activity status (from Discretionary) for Rest Home and Retirement Village activities. This aligns with the intent of the NPS-UD.	Retain as notified.
Activity Status Table – MDRZ	4.5.4	Oppose	PPC13 provides for additional residential activities that apply to the Precinct only. The table should include an activity status for activities that do not comply with the relevant standard.	Provide as <u>xx: any activity listed in kk – uu which does not comply with a relevant standard is a Restricted Discretionary activity or any activity that does not comply with the Precinct Plan.</u>

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				Provide that the matters of discretion are limited to the adverse effects of breaching the relevant standard (i.e. A – General Criteria, in Volume 2, Appendix 1).
Precinct Plan	Figure 4.5-1	Support	Generally, Metlifecare supports this high-level plan.	Retain as notified (subject to the amendments sought elsewhere in this submission).
Height in Relation to Boundary	4.6.3 Note 2	Oppose	<p>Rule 4.6.3(a)(i) requires that where the MDRZ adjoins a General Residential Zone (such as Metlifecare) any building must have a 3m plus 28 degree (between northwest and northeast) and 45 degree on all other directions Height in Relation to Boundary recession plane to provide adequate solar access to adjoining sites.</p> <p>Note 2 of this section proposes removing this requirement from the Precinct. This would enable a 4m plus 60-degree recession plane along the common boundary with the adjoining Metlifecare site. The intention and purpose of HIRB provisions are to provide a level of solar access and visual openness that are deemed to be adequate and be anticipated for sites zoned as General Residential Zone. In this particular instance, the site owned by Metlifecare is located to the south of the PPC13 area and the majority of the properties have their existing outdoor living areas located at their northern portion, i.e. adjacent to the common boundary. Thus, removing the provision will potentially result in development(s) with bulk and mass of a scale that is visually dominating and/or creating</p>	Metlifecare seeks to remove this exclusion, and that the Precinct should have a height to boundary control plane rising at an angle of 28 degrees between the northwest (315 degrees) and the northeast (45 degrees) and rising at an angle of 45 degrees in all other directions, measuring from 3m above ground level along the boundary where it adjoins the General Residential Zone.

			over-shadowing over the neighbouring sites, and comprising the onsite amenity of the residents.	
Permeable Surface, Site Coverage, Building Height.	4.6.5-7	Support Amendment with	Metlifecare supports the proposed provisions, however, suggests amendments to align them with the approach in Plan Change 12.	<p>Amend Standard 4.6.5 as follows: Add a further specific control for retirement village development in the precinct: ... (iv) Retirement villages: Minimum 20%.</p> <p>Amend Standard 4.6.6 as follows: c. For any apartments <u>or retirement villages</u> in the Te Rapa Racecourse Medium Density Residential Precinct the maximum site coverage is 60%.</p> <p>Retain Standard 4.6.7 as notified.</p>
Building Setbacks	4.8.2	Support Amendment with	Generally, these setbacks are supported. To maintain the amenity and density expectation of the adjoining Metlifecare site, being a General Residential Zone, we seek an amendment to add a General Residential boundary setback which also has the benefit of providing a more appropriate transition from Medium Density Residential Zone to General Residential Zone. We also seek an amendment to reduce or remove the 4.8.2(viii) 30m setback with the adjoining Industrial Zone.	<p><i>“iv In the Te Rapa Racecourse Medium-Density Residential Precinct the following setbacks apply: (b) side yard =1m minimum, <u>except where it adjoins the General Residential Zone, the minimum setback shall be 1.5m.</u> (c) rear yard =1m minimum, <u>except where it adjoins the General Residential Zone, the minimum setback shall be 1.5m.</u></i></p> <p>Metlifecare seek to reduce or remove the Rule 4.8.2(viii) 30m setback with the adjoining Industrial Zone.</p>
Public and Private	4.8.3-4	Support in part	Metlifecare supports the proposed provisions	Retain Standards 4.8.3 – 4.8.4 as notified.

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Interface, Separation and Privacy,				
Outdoor Living Area	4.8.5	Oppose	The Outdoor Living Area Standard requires a minimum outdoor living space for each unit that may be cumulatively grouped in one communal area directly adjacent to the relevant unit. This is not appropriate for retirement villages as they often have communal outdoor spaces and internal recreation spaces that are not appropriately or easily calculated on a per-dwelling basis and are not directly adjacent to all units.	Amend standard 4.8.5(e) as follows (or wording to a similar effect):  <u>Outdoor living area standards in 4.8.6(e)(a)-(c) do not apply to retirement villages or rest homes.</u>
Service Areas	4.8.6	Oppose	Metlifecare considers that retirement villages and rest homes should be excluded from this standard because they do not require a service area for each unit. This is not appropriate for a retirement village which often has a communal service area.	Amend 4.8.6.2 as follows (or wording to a similar effect):  <u>The minimum servicing requirements in this table do not apply to retirement villages or rest homes.</u>
Outlook space	4.8.10	Oppose in part	Metlifecare considers that the minimum outlook space for a principal living room in a retirement village should be 3m by 3m rather than 4m by 4m. An outlook space of 4m by 4m is difficult to achieve for all units in a comprehensive retirement village development. Metlifecare is confident that a high level of amenity for residents can be achieved by a 3m by 3m outlook space, particularly where other outdoor communal and recreational spaces are provided.	Amend Standard 4.8.10 as follows: b. The minimum dimensions for a required outlook space are as follows:  i. A principal living room (other than in a retirement village unit) must have an outlook space with a minimum dimension of 4 metres in depth and 4 metres in width.  <u>ii. a principal living room in a retirement village unit must have an outlook space with a minimum dimension of 3 metres in depth and 3 metres in width.</u>

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				As alternative relief, amend this standard to apply a 3m by 3m outlook space for all residential development.
Landscaped Areas and Development Layout	4.8.11 - 12	Support	Metlifecare supports the proposed provisions.	Retain Standards 4.8.11 – 4.8.12 as notified.
RD Matters of Discretion	4.11	Support	Metlifecare support the matters of discretion for Restricted Discretionary activities.	Retain as notified.
<b>Section 23 - Subdivision</b>				
Activity Status Table	Table 23.3(e)	Support	Metlifecare support these subdivision statuses.	Retain as notified.
Subdivision Design Standards	23.7.1 & 23.7.9	Support	Metlifecare support these proposed subdivision standards.	Retain as notified.
<b>Section 25 – Noise &amp; Vibration</b>				
All changes		Support	Metlifecare support these proposed noise standards.	Retain as notified.
<b>Section 1 – Information Requirements</b>				
Landscaping	1.2.2.24	Support	Metlifecare support these proposed landscaping information requirements.	Retain as notified.
Assessment Criteria	P(a) & (b)	Support	Metlifecare support these proposed assessment criteria	Retain as notified.