

Before Hearing Commissioners at Christchurch City Council

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*under:* the Resource Management Act 1991 (*RMA*)

*in the matter of:* an application by Ryman Healthcare Limited (*Ryman*)  
for resource consent to establish and operate a  
comprehensive care retirement village at 100-104 Park  
Terrace and 20 Dorset Street and 78 Park Terrace,  
Christchurch

*between:* **Ryman Healthcare Limited**  
*Applicant*

*and:* **Christchurch City Council**  
*Consent Authority*

Memorandum of Counsel on behalf of Ryman Healthcare Limited

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Dated: 16 June 2021

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**MEMORANDUM OF COUNSEL ON BEHALF OF RYMAN HEALTHCARE  
LIMITED**

- 1 This memorandum of counsel responds to the interim decision of the Independent Commissioners dated 3 June 2021.
- 2 Ryman wishes to pursue the process, as detailed at paragraphs 458 – 460 of the interim decision, enabling Ryman to modify the applications for both Sites before the Commissioners issue a final decision.
- 3 In relation to the Bishopspark Site (application RMA2020/673), Ryman will, in consultation with Ms Armstrong for the Council, amend the conditions to remove matters relating to the Peterborough Site. A similar exercise will be conducted for the Peterborough Site.
- 4 In relation to the Peterborough Site (application RMA2020/679), Ryman will reconsider the design and layout of the Proposed Village on this Site to reduce visual dominance and shading impacts on the middle level apartments at 15 Peterborough Street and reduce late afternoon shading impacts on the outdoor living areas at 18 Salisbury Street.
- 5 Ryman proposes the following timetable for production of the revised Peterborough Site design and layout:
  - 5.1 Ryman will prepare a draft revised design and layout (including architectural drawings and shading diagrams);
  - 5.2 Ryman will consult with Council and neighbours on the draft revised design and layout during the week of 5 – 9 July; and
  - 5.3 Ryman will finalise the revised design and layout following that consultation period. The revised design and layout will be supported by a brief expert statement from Ms Skidmore and Mr Burns.
- 6 Ryman proposes to lodge the amended conditions for the Proposed Village and the revised design and layout for the Peterborough Site to the Commissioners by 30 July 2021.
- 7 Ryman looks forward to receiving the Commissioners' further directions as to the process for revising the applications.

**Luke Hinchey / Nicola de Wit**  
**Counsel for Ryman Healthcare Limited**  
**16 June 2021**