

*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: 18 October 2021

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

- 1 This memorandum of counsel responds to paragraphs 6(f) and (g) of the Independent Commissioners' Minute 9 dated 24 September.
- 2 On 6 October 2021, Ryman received an Addendum Response to Minute (9) prepared by Ms Louisa Armstrong on behalf of the Council, which included a brief statement from Ms Josie Schröder. In summary, the Council officer views are generally aligned with Ryman's and its independent experts' positions that the revised proposal satisfactorily addresses the matters raised in the interim decision.
- 3 The Council's hearings administrator advised Mitchell Daysh today that no further comments have been received on Ryman's revised proposal (the deadline for comments being 15 October 2021).
- 4 In view of that status, Ryman does not wish to respond to the Council's comments. It does not consider a reconvened hearing is necessary and is content with the matter being determined on the papers and a final decision being issued. That said, Ryman and its experts are of course available if needed.

**Luke Hinchey / Nicola de Wit**  
**Counsel for Ryman Healthcare Limited**  
**18 October 2021**