

**BEFORE THE INDEPENDENT HEARINGS PANEL - DAVID HILL (CHAIR), GREG HILL
AND SHEENA TEPANIA**

UNDER the Resource Management Act 1991

IN THE MATTER of Various applications by Te Tūāpapa Kura Kāinga - the
Ministry of Housing and Urban Development (MHUD) to
the Rotorua Lakes Council

BETWEEN **MINISTRY OF HOUSING AND URBAN DEVELOPMENT**
Applicant

AND **ROTORUA DISTRICT COUNCIL** Consent Authority

AND **SUBMITTERS**

SUMMARY STATEMENT OF SARAH COLLINS

Dated 20 / 10 / 2022

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INTRODUCTION

1. This Summary Statement (**Summary**) has been prepared on the basis that the Independent Hearing Panel (**Panel**) has read my pre-circulated full Statement of Evidence (**SoE**). It is on this basis that my Summary simply records:
 - (a) A summary of the key points of my SoE dated 22 September 2022; and
 - (b) Areas of disagreement, points requiring clarification and updates to my expert opinion as a result of my review of the evidence subsequently filed by other parties relevant to my area of expertise.

KEY POINTS OF MY SOE

2. I have based my evidence on my work as a landscape architect who has practised for over 35 years. A significant proportion of my work has been in the design of children's play spaces within public open space and for schools and early childhood centres.
3. New Zealand is a member of the United Nations and recognises the right of the child to play through being a signatory to the Convention of the Rights of the Child, which New Zealand ratified on 6 April 1993. It is Article 31 which establishes that the right of the child to play is a human right.
4. There is a growing body of evidence that supports the benefits of children connecting with nature and engaging in outdoor play as they learn to assess risk, develop physical health, enhance mental health and positive well-being through exposure to the natural world, stimulate creativity and imagination and improve communication skills.

5. The impacts of being deprived of the opportunity to play are widely recognised. Where play that is regarded as being developmentally essential is not experienced, it can result in those affected being emotionally, physically, cognitively, and socially disabled.
6. Given the importance of play in the child's development and New Zealand's recognition of the right of the child to engage in play and leisure activities appropriate to the age of the child; we have a responsibility to ensure a safe environment in which children can play or have access to a wider environment in which play can take place.
7. Ideally play is provided for in a safe environment which flows out from the living accommodation. Playgrounds or reserve spaces, with opportunities for play and informal games, that are within safe walking distance are also important and their proximity was taken into account in my assessment.
8. In my SoE I established that different age groups have different play needs which change as they grow, become more independent and can explore more widely. I then assessed the suitability of the CEH sites based on this discussion and rated each site for the different age groups, these being six months to three years, three years to seven years, eight years to twelve years and twelve years to eighteen years. I graded the sites for their suitability for play for each age group, these being high, moderate, or low acceptability and unacceptable.
9. A summary of my assessment is shown in shown in table format in Appendix 2 of my SoE.

AREAS OF DISAGREEMENT, POINTS REQUIRING CLARIFICATION AND UPDATES

10. The above key points of my SoE are tabled, but I did not present these in my verbal summary at the hearing. Below, I clarify my experience and

what I was asked to do, followed by detailed clarifications of points raised by others.

Tēnā kōoutou kātoa
I whanau mai au ke Te Wāi Pounamu
Engari ki Tamaki Makaurau
Ko Sarah Collins ahau
Ko Kaihoahoa-Taiao toku mahi
Tēna kōoutou kātoa.

11. I am a Landscape Architect, Registered Member and Fellow of Tuia Pito Ora, New Zealand Institute of Landscape Architects. My particular area of interest and expertise is in design for play and education within public open space and environments for learning. A large proportion of my work, in over 35 years' experience, has been in the master planning and design of such environments. I have drawn on that experience and the resources provided by the organisations, of which I am a member, including Play Aotearoa, Play Australia, International Play Association and Recreation Aotearoa, to carry out my assessment.
12. The work I was asked by Council to carry out was the assessment of the suitability of the 13 proposed CEH sites for play, to assist the section 42A team in making their recommendations. I developed a methodology and carried out an assessment of each site.
13. Below are some points of clarification that I make following reviewing the evidence of others.
14. I have reviewed the evidence of Ms Blackwell, Planner, who has presented evidence on behalf of MHUD in relation to the 13 CEH applications. In a discussion that Ms Blackwell has entitled 'Play Space' in paragraphs 9.103 – 9.108 of her evidence, she makes a final statement: *"In my opinion, the internal amenity effects, including in relation to crowding and play space are no more than minor and are acceptable. In forming this opinion, I note that where sites have existing play spaces these will be retained."*

15. In my opinion when Ms Blackwell makes this statement she has missed the logic of the discussion on the right of the child to play, the intention of which is to establish the suitability of the environment for children of different ages to get outside to play safely. For the younger two age groups, the ability to get outside into a safe secure space immediately outside the individual living unit to a space where they can play safely, is what has guided the suitability rating of individual units. Where there are play spaces, they will also be suitable for different age groups to play. For example, a small children's play space in contrast to a space suitable for youth to play basketball.
16. As set out in my SoE, the premise for rating the suitability of spaces has been based on the type of space on site and the type of space within walking distance in the local area.
17. In her paragraph 11.10, Ms Blackwell says that safety is a concern raised by a number of submitters and that it was considered in the evidence of all expert witnesses (except myself). I disagree with this point. The premise underlying assessing the CEH sites and their suitability for children of different ages to play is to consider these environments for children to play.
18. I note that throughout her site-specific annexures, wherever my assessment of 'suitability for play' has rated the CEH facility 'unsuitable' for a specific age group to play, Ms Blackwell notes: *"In my opinion, such restrictions, while well intended, are misplaced in the context of a community experiencing a significant housing crisis. I acknowledge the evidence that access to playspace and more extensive living environment are contributors to a child's well-being and can aid in a child's developmental process. However, I consider access to warm, safe, and stable accommodation are overriding factors to achieving the same essential outcomes. In my opinion, restricting whanau with children from occupying studio units, or limiting children of certain age groups from*

particular units, is likely to result in perverse outcomes, which ultimately would translate to whānau being unable to access CEH accommodation.”

She then notes that the undertaking of a needs assessment of each whānau is at the forefront of decision making around placement in suitable living environments.

19. In my opinion, if this is the case, the suitability of units to allow for play by children of different age groups should be part of the assessment process, to allow the most suitable accommodation to be provided for families. I believe that using a system such as I have described as a basis for the assessment will be invaluable.

20. I have reviewed the evidence of Ms Healy who submitted evidence on social effects on behalf of MHUD. In her paragraph 7.10, she makes recommendations with one being: *“On-site dedicated play areas for children on site or alternatively residents being supported to access local parks within close proximity and supported to access these”*. I do not disagree with this as a recommendation. In my approach to the suitability of CEH sites for use by children to play, where I have thought about the needs of different ages of children, it can be that for young children the most important thing is for the child to be able to move outside the unit to a secure safe area. That space should be adjacent to the living unit, where they can play observed by their parent/caregiver, not necessarily a play space, which some CEH sites do not have.

21. I have reviewed the evidence of the operator of Pohutu Lodge Motel, 3 Meade Street, Akshar Rajvanshi. At paragraph 3.11, Mr Rajvanshi states that there is a large on-site secure courtyard which is utilised by occupants as a recreational area. This statement requires clarification, as in my opinion the internal courtyard is a carpark area which is not safe for children’s play. The lack of a secure safe space to play is part of the reason for my rating the facility low in terms of suitability for play for different age groups.

22. I have reviewed the evidence submitted by Emerge Aotearoa Trust and note the proven track record that this group has in delivering social services to individuals, whānau and communities. In the evidence at paragraph 3.2, they state that two of the motels that they work with, Ann's Volcanic Motel and Midway Motel, have space for play. They further note that Geneva Motor Lodge, whom they also work with, does not have a designated play space and they work with parents and caregivers to encourage tamariki to attend suitable after school care programs. I consider that this is excellent and will benefit the tamariki, but it does not provide space for young people to explore and challenge themselves independently, which is a further need that should be catered for.
23. I have reviewed the evidence of Toli Maka, Housing Manager of WERA Aotearoa Charitable Trust. WERA is a Māori based organisation that support whānau with housing, employment, reintegration and youth services. They are working with Ascot on Fenton, Apollo Motel and Rotovegas Motel. I note in their evidence that WERA work within the facilities running hui for all whānau within the 'village' to influence how the village functions. The suggestions I have made for the use of space for play activities managed for different age groups might be great subjects for discussion within these 'village' hui.
24. I have reviewed the evidence of Sarah Isaac of Visions of a Helping Hand Trust who work to support whānau to reach their goals by building on whānau strengths and aspirations with the aim of developing strong, safe, and sustainable communities. Visions work with the following CEH sites; Union Victoria Motel, Alpin Motel, Emerald Spa Motor Inn, Pohutu Lodge, New Castle Motor Lodge, Malones Motel and Lake Rotorua Hotel. I recognise the support provided and note that Visions consider the following when deciding on the placement of whānau in CEH facilities:
- play space for tamariki; and

- the age of children.

25. While I recognise the invaluable support services that Visions offer, despite these support services I note that due to their on-site layout, some of the facilities they work with provide a safe environment for children's play and others do not, noting that different age groups have different needs. I believe that the evidence I have prepared and the way of analysing the sites suitability should support Vision's analysis.

CONCLUSION

26. I have prepared my evidence as a Landscape Architect who has worked in the design of spaces for children for much of my career. I am a current member of the play organisations that I have drawn on to present the discussion on the developmental importance of play and to develop the strategy to analyse the CEH sites.

27. The analysis rates different sites (high, moderate, low (bare minimum) and unacceptable) for children of different ages to play, because of the importance of play to the development of the tamariki.

28. I stand by my assessment and believe that it assists in the analysis of the suitability of the CEH sites as temporary accommodation for whānau, through the consideration of the sites for play by children of different ages.

Sarah Collins

20 October 2022