

**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 Applicant Applicant

AND **ROTORUA DISTRICT COUNCIL** Consent Authority
Consent Authority Consent Authority

AND **SUBMITTERS**

STATEMENT OF EVIDENCE OF SARAH COLLINS

Dated 22 / 09 / 2022

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INTRODUCTION

1. My full name is Sarah Ann Collins.
2. I hold the qualification of a Bachelor of Arts and a Post Graduate Diploma in Landscape Architecture. I am a Registered Member and Fellow of the New Zealand Institute of Landscape Architects. I have practised as a landscape architect for over 35 years, over that period a significant proportion of my work has been in the design of children's play spaces; in public open space and for schools and early childhood centres.
3. I have read the Code of Conduct for Expert Witnesses, contained in the Environment Court Consolidated Practice Note 2014 and agree to comply with it. I confirm that the issues addressed in this statement are within my area of expertise and that in preparing my evidence I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

PURPOSE OF THIS EVIDENCE

4. This evidence focuses on 'The Right of the Child to Play' and the effects on this right of the proposed resource consents for 13 motels to be used for Contracted Emergency Housing (CEH) in Rotorua for a period of up to five years. These CEH motels are to be used for vulnerable individuals and families, who otherwise have no accommodation. As young children and young people are involved, the suitability of the sites for play requires consideration.

SUMMARY

5. In my evidence I have established the right of child to play, considered different types of play, related the different types of play to the opportunities and spaces appropriate for different age groups to 'play' in.

6. I have then conducted an assessment of the suitability of the CEH sites, based on what has been established, with respect to each age group and their needs.
7. A summary of my rating assessment of the suitability of each of the Application Sites for play by children of different age groups is set out in a table in **Appendix Two** of my evidence.

MY APPROACH

8. I have approached the task of establishing the suitability of the application sites for play, as set out in this evidence. First establishing New Zealand's commitment to the 'Right of the Child to Play', then working through why play is important and what different age groups require with respect to play. I then discuss the CEH motels that make up the application sites and rate the suitability of each site for children and young people. This information will be presented in a table which rates the suitability of each individual site for each age group, followed by a more detailed discussion on the rating. Lastly, I show the locations of the motel sites together with the distance from each individual site to local reserve spaces as indicated by the Operative Rotorua District Plan (ODP). This information is set out in a table in **Appendix One** of my evidence.
9. The evidence relating to the application sites has been prepared as a desktop exercise, using the application reports, aerial photography and photographs taken by one of the section 42A Report authors, Bethany Bennie, who has made visits to the application sites.
10. I note that for each individual site, the CEH provider plans to organise support services that are available to the emergency housing occupants including the opportunity to raise concerns regarding children. The detail of the support is presented on behalf of Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development (MHUD), however I note that the support includes opportunities for support with homework and

learning skills, after school and holiday programs and safe spaces for children to participate in individual and team activities.¹

INTRODUCTION TO ASSESSING THE SUITABILITY OF SITES PROPOSED FOR CEH HOUSEHOLDS WITH CHILDREN

11. With respect to this evidence, I have been asked to provide advice on the opportunity for children to play in the context of the proposed activity, this being the provision of CEH for *“families and whānau with children, young people and people with disabilities”*.²
12. I understand that while the need for emergency housing is great in Rotorua at present, emergency housing is already operating with tourist accommodation units currently being used for both contracted and uncontracted emergency housing.³ There has been a progressive increase in demand over the last 5 years.⁴
13. I further understand that the resource consent applications for the CEH are being made to authorise the activity both retrospectively and into the future. MHUD has already gone through a selection process utilising the Rotorua Housing Taskforce (consisting of iwi and local and central government agencies) to select the providers for CEH for whānau with children, young people and people with disabilities. In addition, each individual site contracted to MHUD to provide CEH has a contracted service provider who:
 - a) Carries out an assessment of the immediate needs of the client or whānau and arranges any necessary services to meet those needs.
 - b) Meets regularly and works with each client or whānau to identify and manage issues that arise in relation to their stay in CEH.

¹ Ref MHUD application

² REFERENCE – MHUD application

- c) Prepares an individualised action and transition plan in conjunction with each client or whānau to document actions proposed to address any health, social, employment and financial needs; and
 - d) Assists in the transition to more permanent housing options where these are available.
14. It is my opinion that if children are to have the opportunity to play consistent with Government's commitment to 'The Right of the Child to Play', it is important to assess the suitability of the application Sites for play and to provide a framework for assessing the suitability of each individual site as households which include children.

PLAY DISCUSSION

15. New Zealand, as a member of the United Nations, recognises the rights of the child through being signatory to the Convention of the Rights of the Child (UNCRC).
16. The UNCRC opened for signature on 20 November 1989 and New Zealand ratified the Convention on 6 April 1993.
17. It is Article 31 of the Convention which establishes that 'the right of the child to play' is a human right.

Article 31

- a) States Parties **recognize** the right of the child to rest and leisure, to engage in play and recreational activities appropriate to the age of the child and to participate freely in cultural life and the arts.
- b) States parties shall **respect and promote** the right of the child to participate fully in cultural and artistic life and shall encourage the provision of appropriate and equal opportunities for cultural, artistic and leisure activity

(My emphasis added)

18. Given that in New Zealand we have made the commitment to recognize the human right that children engage in play and recreational activities

appropriate to their age, we have a responsibility to ensure a safe environment in which children can play or access a wider environment in which play can take place.

WHAT IS THE DEFINITION OF PLAY?

19. Play is defined as “what children and young people do when they follow their own ideas and interests in their own way and for their own reasons.”⁵
20. The International Play Association (IPA) lists the key characteristics of play as fun, uncertainty, challenge, flexibility and non-productivity. These characteristics of play are relevant to young people of all ages.
21. “Intent” is the key difference in the play of children. Adults or those supporting children have a role in fostering and providing for the opportunity to play. In comparison with younger children, the play of older children and adults’ changes where they make a conscious decision to go somewhere and to be in a place where they can engage in their own versions of “play”.

WHERE DOES PLAY HAPPEN?

22. Ideally, play is able to happen in a range of different spaces. At a very young age, prior to beginning to walk, much of playtime is spent indoors as the child grows and slowly begins to explore the outdoors. The ideal situation is that there is a safe opportunity for the child to play outdoors immediately. As a child grows, opportunities flowing on from the indoor to outdoor area and from informal settings through to formal play spaces are important.
23. Whilst ideally the opportunity for young children to play would be provided for within a safe environment that flows directly out from within

⁵ Wellington Play Spaces Policy 2017; Quote from Play England playengland.org.uk/about-us/why-play-is-important/

the living accommodation, incidental play can occur anywhere. This is immediately apparent if one walks anywhere with a young child, with the young child being able to find an incidental space to play anywhere.

24. With respect to play, 'anywhere' can mean a backyard, front yard and even road verges. However, it can also be an open space where there is a slope to roll down, a tree that drops leaves that can be collected, sorted, kicked around, shaped into a plan of a room, thrown to the wind or into a stream. Anywhere can also mean a non-natural environment, such as a kerb or low wall to walk along, perhaps a higher wall to jump off. All of these places can become a location for incidental play.
25. Formal play spaces are dedicated sites or parts of sites where play is identified as one of the main functions of the site. These spaces are often provided by Councils at local government level, who provide a network of dedicated free outdoor play spaces across the city. Formal play spaces are generally within parks that are part of the wider open space network, which offers informal play opportunity within the city.
26. The network of play spaces is generally established on a city-wide basis to provide a range of play experiences. There is generally a hierarchy in the approach to play space provision in order to allow the investment in these spaces to be assessed and prioritised.
27. Destination play spaces are spaces which people generally have to travel to get to. While these places are visited less frequently, they have the widest range of equipment, providing for the widest range of ages, abilities and facilities. Rotorua Lakefront play space is an example of a destination playground.
28. Neighbourhood or local parks are generally established to meet the needs of the local community; hence one would generally be able to walk to such a park where there might be equipment to meet the needs of one or two age groups of children. Whilst the equipment might serve only one

or two age groups, the reserve space offers the opportunity for informal play within nature or the outdoors and there is generally seating space for adults to sit, observe and socialise. It is common for park spaces to provide a playground, there may also be sports fields and/or skateparks. An often-quoted ideal distance for walking to a local park is within 600 metres.⁶

29. There are also other small reserve spaces within a city which may be referred to as doorstep play spaces. Often these spaces are left over areas and consist of a vacant lot or a wide berm in a residential street or even a quiet blind end street. While such spaces do not generally contain any equipment, some may have a basketball hoop or space to kick a ball. These doorstep play spaces can also provide an opportunity for older children to play in a less supervised setting close to their homes.
30. Rotorua provides and maintains a range of open spaces and parks, together with a walkway network which provides for the needs and enjoyment of the community. Park spaces include playgrounds with a range of equipment pieces, skate park areas, open space for informal play as well as fields which are also used for competitive games and these spaces are also available for informal play or social games at times.

WHY IS PLAY IMPORTANT?

31. Regionally, nationally, and internationally research shows that play is important for the development, health and well-being of children. It is also evident that the wider benefits of play have a very broad reach, including social and environmental.
32. When children have the opportunity to play, they are able to explore the different settings and environments on their own terms. They will, through their play, be exposed to different settings and environments as

⁶ Wellington Play Spaces Policy 2017

well as different challenges. In a social setting, they will also interact as they play with other children and adults in different places. It is through their play that children will discover what they can and cannot do.

33. There is a growing body of evidence to support the position that there is benefits in children connecting with nature and engaging in outdoor play. The benefits for children of 'play' in natural environments is considered to include:
- a) Improved ability to judge and understand risk as they learn about and take risk throughout their years of learning.
 - b) Increased physical health through exercise.
 - c) Enhanced mental health and maintaining positive well-being through exposure to the natural world.
 - d) A stimulated imagination and creativity through outdoor play and learning; and
 - e) Improved communication skills and the ability to build and maintain relationships.

PLAY DEPRIVATION - WHAT HAPPENS WHEN CHILDREN DO NOT PLAY

34. The impacts on children of being deprived of the opportunity to play are widely recognised. One such example is the IPA World Declaration which sets out what is known in this space:⁷

'Play is clearly pleasurable and joyous for children; it contributes to positive emotion and is a recognised and valued part of childhood that is increasingly being denied or curtailed by the actions of adults and society, resulting in reports of unhappy children from around the globe.

Play deprivation is highly detrimental to affected children, communities, and society as a whole. Not playing deprives children of experiences that are regarded as developmentally essential and results in those affected being emotionally, physically, cognitively, and socially disabled.

⁷ IPA World; Declaration of the Importance of Play 2014

If normal play experiences are absent the child is more likely to become violent and antisocial. Although data on the impact of not playing for humans is sparse, the findings of studies that do exist give cause for concern. **If children are kept in and not allowed out to play, they are likely to manifest symptoms ranging from aggression and repressed emotions and reduced social skills, to inactivity and an increased risk of obesity.** Adults reporting environmental restrictions on play (e.g., having less time to play) are more likely to be overweight and have less healthy lifestyles.

If children do not play, then their brains will not grow as they should. Continuous sensory deprivation – lack of human contact and other forms of sensory deprivation – **causes symptoms ranging from depression and withdrawal to a gradual loss of electrical activity** in the brain and affect other factors.

There is great danger that the effects of the current changes in society and the environment will have lasting impact on our children and their children, thus affecting the whole species. The study of human genetic material (epigenetics) has shown that **the effects of deprivation on one generation can 'echo' through subsequent generations.**

[My emphasis added.]

WHAT PLAY ACTIVITIES ARE APPROPRIATE TO DIFFERENT AGE GROUPS OF CHILDREN?

35. 'Play theory' defines the types of play that are applied to different age groups in order to maximise the potential benefit of the child. The following sections set out the different ages groups and which play activities are appropriate for them.

Babies – birth to approximately 6 months

36. In their earliest months of development from birth to around 6 months, before a child becomes mobile, 'play' is closely tied to the parents caring for the child. This means play is limited to the immediate environments and is largely indoors. However, as previously stated, it is important for the child to have the opportunity to be outdoors, looked after by the carer.

Toddlers aged from 6 months to approximately 3 years

37. Play for this age group is generally carried out with the carer nearby (often guiding the play). In their earliest months, most of a child's play

will be inside the home but as the child grows, opportunities for play within the outdoor environment become more important. This includes things such as crawling, walking, running, rolling on gentle slopes, climbing (with only low-level changes), gentle rocking, manipulation of tactile surfaces such as sand and interaction with natural elements and wildlife (e.g., birds).

Junior children (approximately 3 – 7 years)

38. As children grow the play becomes more child directed and, at this age, is generally with parents in attendance. Play activities include running, climbing, agility skills, skipping and playing with a ball. Opportunities for dramatic play and use of their imagination is also important, including using loose materials such as sand, water and vegetation and collecting things such as seeds, leaves, plant seed stalks etc. In park spaces, it is important that there is provision of small-scale spaces for the mastering a range of skills including skateboards, roller skates or tricycles graduating to bicycles.

Older children approximately 8 to 12 years

39. Within this age group there are opportunities for highly varied play, and potentially unsupervised play. For these children, there is a need and desire for physical challenges to enable them to master skills, including bicycle tracks and skateboard areas. As children grow, there is also more need for social gathering spaces and places to play games which have rules (either recognised games or ones where the group makes up the rules). Older children may also begin to manipulate the natural environment in more complicated ways with respect to play.

Youth, from around 13 to 18 years or older

40. There is a much greater desire in this age group to master new skills and games and often these children will take action to test their physical ability, seeking thrills, competing, parading, and socialising or just

mucking around. At this age, young people may also test play equipment or other things designed for different uses in ways for which it was not designed or intended to be used.

WHAT TYPE OF OUTDOOR SPACE IS IDEAL FOR EACH AGE GROUP TO HAVE ADJACENT TO THEIR CEH FOR THE TYPE OF PLAY THEY REQUIRE?

41. In this section of my evidence, I will further my discussion on the type of play required by children of different age groups by looking at what type of outdoor space is 'ideal' for each age group to have within the vicinity of their CEH.

Toddlers aged from 6 months to approximately 3 years

42. Within the CEH site, the ideal space for children of this age group would be a fenced outdoor space accessed from the living unit with lawn and space suitable to crawl, walk, run, and roll on, where their caregiver can be involved in their activities or sit and watch. A park within walking distance, whilst ideal, is not as important for a child of this age.

Junior children (approximately 3 – 7 years)

43. For children of this age group, the ideal space would be a safe, fenced outdoor space (preferably accessible from the living unit) which has both lawn and hard surface area where the child can begin, with supervision, to develop their skills, explore and challenge themselves. A park within walking distance becomes more important at this age, as the child (with supervision) needs to move on to neighbourhood small scale outdoor spaces, where they can begin exploring the environment more widely and begin learning scooting, skating and biking skills.

Older children approximately 8 to 12 years

44. It is important for children in this age group to be able to access outdoor space, within the CEH site, where they can safely meet and socialise. However, a nearby park which has space for ball games, a bike track or

skate park becomes much more important to a child of this age. Ideally, such a park would be within 600m walking distance on a safer local road, to allow the child the freedom, on occasion, of accessing this without a carer.

Youth, from around 13 to 18 years or older

45. Within the CEH site, it would be ideal for youths to be able to socialise in outdoor space. However, as the appropriate play for this age group involves testing physical ability, seeking thrills, competing and parading or just mucking around, space beyond the complex becomes of greater importance. The importance of access to park space for physical challenge and competition means that play spaces of a greater distance are acceptable.

LENGTH OF STAY IN CEH

46. I understand it is the intention is that the length of time that whānau with children stay in CEH is minimised, with CEH no longer being required when circumstances change, or a more suitable permanent solution is found. This is important as it is my opinion that there needs to be some discussion regarding the length of time that whānau with children might stay in CEH in relation to the opportunity for children to play in outdoor environments.
47. A child up until the age of around 6 months is cared for and the need for time in the outdoors is limited to the time they are outdoors with their carer. If CEH units are only available without suitable outdoor space, this could be acceptable for children of this age group. Whilst CEH units are small and designed for whānau groups with families to stay in for a short time (less than a fortnight), the length of stay in these units could be longer (3 – 6 months) for a group with one child only up to 6 months of age.

48. Once children reach an age where they are mobile (e.g., toddlers), and they mature through the different age groups discussed above, the space for play and opportunities in the wider outdoors becomes more important. The CEH sites for whānau with families should be selected on the basis of assessment of the unit's suitability for the needs of play, in relation to the age of the children, using the methodology set out in paragraphs 52 - 53 below. Should suitable opportunity not be available, any CEH units or sites available should only be provided on a true short stay basis (not more than a week), whilst a more suitable safe unit is found.

THE PHYSICAL LAYOUT OF THE CEH SITES

49. The physical layout of the emergency housing sites that have been contracted by MHUD varies.
50. We recognise that MHUD has gone through a selection process utilising the Rotorua Housing Taskforce to select the providers for CEH for whānau with children, young people and people with disabilities.
51. Whilst MHUD has already worked through this process, a system of assessing the suitability of the location, layout and availability of outdoor space for children of different ages relative to their play needs is useful as the resource consent applications are still under consideration. Such a strategy could in the future assist the CEH providers as they assess the suitability of units for whānau with children.

RATING THE SUITABILITY OF CEH FOR CHILDREN AND YOUNG PEOPLE

52. In the preceding paragraphs of my evidence, I have reviewed the importance of play for children and young people, the types of activities that are important for the different age groups and finally discussed the spaces and opportunities that would be ideal for different age children.

Using this information, I will now rate the suitability of each application site for children and young people.

53. In my review of the CEH sites with respect of different age groups, I will apply the following methodology:
- (a) **Baby, new-born to 6 months:** The child is not mobile and for a short stay 'play' within the unit is acceptable.
 - (b) **Toddlers, 6 months – 3 years:** Facilities will be rated highly where there is safe flow from the living unit to an outdoor area, which is securely fenced and has lawn and shade. Where the outdoor space is not secure, the rating drops. If a safe outdoor area space is not available within a facility, access to a local neighbourhood park within 600m will lift the rating.
 - (c) **3 – 7 years:** Facilities will be rated highly where there is safe flow from the living unit to an outdoor area, which is securely fenced and has lawn, hard surface suitable for developing skills and shade. Where the outdoor space is not secure, the rating drops. If a safe outdoor area space is not available within a facility, safe access to a local neighbourhood park within 600m becomes very important and will lift the rating.
 - (d) **Older children 8 – 12 years:** Facilities with open space will be rated highly for this age group, even though the rating would otherwise drop for the younger age group where the same space would not necessarily be as safe and secure. This approach to rating is because children within this older age group are becoming more independent and have developed skills to assess risk. The importance of the outdoor space within the facility is for children of this age group to be able to meet and socialise. The rating will fall if there is not a nearby park as at this age, space activities become much more important. The consideration of the

space being 'within 600m distance away' via a safer local road route is also important as freedom to access without a carer is possible.

- (e) **Youth from 13 – 18 years or older:** Facilities can achieve a medium rating with some space to socialise in outdoor spaces. To achieve a high rating, the facility must have a park space for physical challenge on site or nearby, as appropriate play means testing physical ability, competing, and parading or just mucking around and so space beyond the complex becomes of greater importance. If the space is within 600m of the site, it will be more highly rated than if it was located a kilometre or more away.

RATING THE CEH SITES FOR SUITABILITY TO PLAY

54. I have used my expertise as a landscape architect experienced in the design of spaces for play, to discuss the suitability of each of the application Sites for children, thinking about the needs of different age groups, the scale of space required and safety. In the following sections I present a discussion and rating regarding the suitability of each individual site for whanau with children. A table showing the rating of suitability I have applied to each individual site for children of different age groups is set out in **Appendix Two** of my evidence. The locations of the application Sites and the distance from these to local reserve spaces identified in the ODP is set out in a table in **Appendix One** of my evidence.

Lake Rotorua Hotel, 131 Lake Road, RC17647

55. I have rated this CEH site **moderate** for children 6 months to 3 years and 3 to 7 years where there is the opportunity to get to the lawn outside from three sides of the unit, but the space from each unit is not secure. In this site, the units to the north open into the courtyard and back onto an area where additional parking is accommodated on a gravel area. Whilst children can get outside, they will need close supervision and so

the rating for these units is dropped to **low**. On the opposite side of all units, there is a courtyard with a well-formed pedestrian path around it and parking around the courtyard. There is also a separate fenced courtyard where people can meet, plus a lawn area to the northeast of the site.

56. I have rated the site **highly** for the 8 to 12 year old and 13 to 18 year old age groups. This is as these groups can meet in the central courtyard to play and socialise as well as on the additional lawn area (the size of a residential lot) extending beyond the gravel carpark adjacent to the site. This is an important additional area for play activities and informal games for these older more independent groups. The high rating is predicated on there being a pedestrian path marked along the back of the northern units, with bollards or similar to create a path protected from cars for children to access the grass area. In addition to the space adjacent to the motel, Karenga Park, with play equipment and grass space for informal games is 135m away, an easy walk with parents or a further place for independent social games for those who are more independent.

Alpin Motel, 16 Sala Street, RC17648

57. I have rated this CEH site **highly** for children 6 months to 3 years, 3 to 7 years and 8 to 12 years where each unit has a small, fenced private courtyard directly outside, making it safe for small children. There is also the opportunity at this site to move from this small courtyard into a central courtyard, with lawn accessible from all units. This courtyard is large enough to provide for more independent older children as well as the younger age groups and is separate from cars which circulate on the outside of the units as each unit has a carpark at its door. The park at Murray Linton Rose Garden is 517m away and McIntyre / Sala Street Reserve is 656m away, both within walking distance.
58. I have rated the facility **moderate** for the 13 to 18 year old age group. Although they can meet in the central courtyard to play and socialise,

there is insufficient room for larger group activities and informal games for these older more independent groups, together with younger age groups. Active sports parks at Puarenga Park (1,522m) and St Michael's Reserve (2324m) more suitable for the older group are more distant.

New Castle, 18 Ward Avenue, RC17650

59. I have rated this CEH site **low** for children 6 months to 3 years, 3 to 7 years and 8 to 12 years, where each unit only has a tiny deck area directly outside the rear of each unit. If the courtyard is securely fenced, it will be safe for small children to play. There appears to be surrounding vegetation which provides some amenity and shade, particularly along the four ground floor units to the rear of the site. Upstairs units however only have a small Juliet deck. This site also offers no opportunity to get outside into a central courtyard where the outdoor space is a carpark of limited area. The park at Murray Linton Rose Garden is directly across the road (126m) and McIntyre / Sala Street Reserve is 571m away, both within walking distance. This proximity is what has lifted the rating from unacceptable for the 8 – 12 year old age group, where the play opportunity physically on site would not be acceptable.

60. I have rated the facility **moderate** for the 13 to 18 year old age group. While these children can meet in the Murray Linton Park over the road with the park being highly accessible, it is not an ideal space for larger group activities and informal games, for older more independent groups. Active sports parks at Puarenga Park (1,345m) and St Michael's Reserve (1,720m), more suitable for the older group, are more distant.

Pohutu, 3 Meade Street, RC17661

61. I have rated this CEH site **unacceptable** for children 6 months to 3 years and 3 to 7 years, where the eastern two storey units only have a tiny outdoor courtyard at the rear. These courtyards are not securely fenced which is required if they are to achieve a rating of **low**, and the area is to be safe for small children. I consider that studio units remain

unacceptable for the younger age groups where both the internal and external living environment is very small.

62. I have rated as **unacceptable** for those 8 to 12 years old where there is no space on site nor nearby for young people who are becoming more independent. Other units at the site are studio only and there is no opportunity to get outside into a central courtyard where that outdoor space is utilised fully as a carpark.
63. I have rated the facility **low** for the 13 to 18 year old age group where there is no place on site nor nearby for groups to socialise or for group activities and informal games for older more independent groups. The nearest active sports park is Centennial Park, 1,126m away. Perhaps older children can reach this, though it is accessed along a busy road and there is not a safe crossing. Other parks such as Murray Linton Rose Garden (725m) and McIntyre / Sala Street Reserve (1,181m), are outside the ideal distance away as well as the other sports parks St Michael (2,252m) and Puarenga (2,047m).

Malones Motel, 321 Fenton Street, RC17662

64. I have rated this CEH site **unacceptable** for children 6 months to 3 years and 3 to 7 years where there is no outdoor space associated with each unit, even though units 1 – 10 have an outdoor covered space with a spa (which is not to be used for CEH). Cars also circulate in front of each unit. Although Murray Linton Park is comparatively close at approximately 500m away, it is a park that only accompanied children in this age group could walk to.
65. I have rated the facility **low** for the 8 to 12 year age group and 13 to 18 year old age group where there is no place on site nor nearby for groups to socialise or for group activities and informal games for older more independent groups. Murray Linton Park is within 500m and has some open space however the nearest active sports park is St Michaels Reserve

Sports Park which is 1,311m away. While perhaps older children can reach this, it is accessed along a busy road and there is not a safe crossing.

66. I propose that if two areas were fenced off, there could be some space for 'play' activities on site. The first area is at the entry from Fenton Street, which could be closed and the Sumner Street entry only used. This together with the area on the left-hand side could be for the use of small children. The second area is at the end of this first building, a flat area adjacent to where the internal accessway ramps up to the upper part of the site. This area could be separated off and utilised as a more active basketball hoop space, where older children could 'play' and socialise. These changes could lift the facility rating for the younger children from unacceptable, but not more than low, where the spaces do not spill out from the living unit and require supervision.

Union Victoria, 26 – 28 Victoria Street RC17673

67. I have rated this CEH site **unacceptable** for children 6 months to 3 years and 3 to 7 years where there is some limited access to outdoor space to the rear of the units, but it is very much the 'back door' and is not individually fenced. The site is also double storey and units are accessed from a central vehicle dominated courtyard.
68. I have rated the facility **low** for the 8 to 12 year age group and 13 to 18 year old age group where there is limited space on site for children in these age groups to gather. Sheaf Street Skate Park is, however, located approximately 542m away. Access to this park is along Ranolf Street, a busy street, but there is a traffic light pedestrian crossing at the intersection with Amohau Street. This does provide an activity and place to meet and socialise for older more independent children, however, the closest parks for active ball games in open park space are St Michaels Reserve Sports Park (868m) and Puarenga Park (1,891m). There is no suitable place on site nor nearby for groups to socialise or for group activities for older more independent groups. I also, recently understand

that the Racecourse which is within 500m away, is accessible to the public, hence will be available for these older more independent groups.

69. There is a very small space adjacent to the smaller motel building on the western side of the site, adjacent to the frontage, which could include the area to the rear of the two units here and, with fencing, it would create a space for a few children in the 3 to seven year age groups to play. This would lift these two ground floor units to a little better, just within the low rating.
70. I have been made aware of an internal referral input by Rotorua Lakes Council Landscape Architect Melanie Cameron with urban design feedback on this site. The report suggests further to the areas shown on the site plan some carparks could be removed (via fencing) to increase the size of the communal space as not all emergency housing residents will have a car. This additional space would provide a space for the 8 to 12 year and 13 to 18 year old age groups to gather and socialise lifting the rating to moderate.

Ascot on Fenton, 247 Fenton Street and 12 Toko Street RC17887

71. I have rated this CEH site **unacceptable** for children 6 months to 3 years and 3 to 7 years, where the outdoor space on site is given over to vehicle access and there is no safe space for children in this age group. There is also no outdoor space associated with each unit. The site is double storey and units are accessed from a central vehicle dominated courtyard, with no access to the rear of the units. While a trampoline which has been squeezed in between the two motel units is of limited value, it is the only real space to get outside and be active. The trampoline may allow up to four supervised children to be active outside so it should be retained.
72. I have rated the facility **low** for the 8 to 12 year age group and 13 to 18 year old age group, where there is no space on site for children in these age groups to gather. However, St Michael's Reserve Sports park is 457m

away and groups could engage in active recreation, or other group activities as they are older and more independent. Puarenga Park is also 1,488m away. I also, recently, understand that the Racecourse which is within 500m away, is accessible to the public, hence will be available for these older more independent groups.

Roto Vegas 249 Fenton Street and 16 Toko Street RC 17889

73. I have rated this CEH site **highly** for children 6 months to 3 years and 3 to 7 year old children who live in the two ground floor units to the south west of the main site. The three units at 8A, 8B & 10B Toko are also suitable for these younger children as each of these units have direct access to outdoor space.
74. Within this site, there is a shared open space with play equipment and a games / pool room with a BBQ area, across the carpark. These opportunities have led to our rating the site **moderate** for the 8 to 12 year old and 13 to 18 year old age groups. This rating is where there is access to the shared facilities on site which, whilst some units are upper storey and access will be to come downstairs and for some across the carpark, could be managed and there are good facilities on the site. Further to this St Michaels Reserve Sports Park is 415m away and Puarenga Park Sports Fields is 1,447m away. I also, recently, understand that the Racecourse which is within 500m away, can be accessed by the public, hence will be available for these older more independent groups.

Midway Motel, 293 Fenton Street, RC17890

75. I have rated this CEH site **highly** for children 6 months to 3 years and 3 to 7 years, where the buildings are single storey, and each unit has a small private courtyard / outdoor space accessed through the rear of each unit. Further to this there is a shared amenity space (75M²)/play area and games room on the site.

76. I have rated this facility **moderate** for the 8 to 12 year old and 13 to 18 year old age groups. This rating is where there is access to the shared facilities on site and the small courtyards at the rear of reach unit. A limitation as young people become more independent is the distance to neighbourhood parks with Murray Linton 902m away and McIntyre / Sala Street 1,399m away. Furthermore, this site is better for younger children as youths need more local space and the sports parks are located quite far away (St Michael's Sports Park Reserve 894m and Puarenga Park 1589m). I also, recently, understand that the Racecourse which is within 500m away, is accessible to the public, hence will be available for these older more independent groups.
77. We understand that local schools' playgrounds and field areas are closed outside school hours and at weekends. However, if there was an option to work with local schools to make outdoor areas available outside school hours and at weekends, this could improve play opportunities for these age groups. However, in my opinion the site is best retained for the younger age groups as it is one of the most suitable facilities for this age group.

Geneva Motor Lodge, 299 Fenton Street, RC17891

78. I have rated this CEH site **unacceptable** for children 6 months to 3 years and 3 to 7 years in the upper storey units. The rating is lifted to **moderate** for children 6 months to 3 years if they are in one of the eight ground floor units which have a small outdoor courtyard. For children 3 to 7 years, the rating is **low** as while there is this outdoor space, it is small and there is no further outdoor space associated with the site. Murray Linton Park and playground is 814m away, not ideal, but possible to walk to.
79. I have rated this site low for the 8 to 12 year old and 13 to 18 year old age groups as children in these age groups need more space and this is not highly accessible with this site. Neighbourhood play space at Murray Linton is distant (814m) and sports parks are even more distant; St

Michaels Sports Park (963m) and Puarenga Sports Park (1519m). I also, recently, understand that the Racecourse which is within 500m away, is accessible to the public, hence will be available for these older more independent groups.

80. Again, we understand that local schools' playgrounds and fields are closed outside school hours and at weekends. However, if there is an option to work with the local Glenholme Primary School and nearby Saint Mary's Catholic School to make outdoor areas available outside school hours and at weekends this could improve play opportunities for these age groups.

Ann's Volcanic Motel, 107 Malfroy Road, RC17892

81. There are 10 single storey units on this CEH site, with four studio units at the rear of the site having an outdoor space associated with them. However, as studio units generally are one room spaces, I have rated these as **unacceptable** for children.
82. The six other units on the site each have an outdoor courtyard, together with a proposed play space at the rear of the site. I have therefore rated these units with a **high** rating for 6 month to 3 year old and 3 to 7 year old children.
83. I have dropped the site's rating for children in the 8 – 12 year and 13 – 18 year old age groups to **moderate** as these children become more independent and need more space. This is as although Sheaf Park, a skate area, is 818m away, the space within each unit is small and there is no real opportunity for more active play or socialising on site.
84. Again, we understand that local schools' playgrounds and fields are closed outside school hours and at weekends. However, if there is an option to work with nearby Rotorua Intermediate School which is almost next door (101m) to make outdoor areas available outside school hours

and at weekends. This could improve play opportunities for the older age groups.

Apollo Hotel, 7 Tryon Street, Rotorua, RC 17893

85. I have rated the units at this CEH site **low**, and for units on the upper levels **unacceptable** for the younger age groups (6 months to 3 years and 3 to 7 years). This is as the outdoor space is dominated by a pool and is hard surface. Although MHUD's application states that most units have access to a small outdoor courtyard, this is again hard surfaced and often enclosed for safety from falling. Play space reserves at Murray Linton are 609m away and McIntyre / Sala Street 845m away.
86. I have lifted the rating to **moderate** for 7 – 12 year and 13 to 18 year old age groups. At these ages children are, or are becoming, more independent. The opportunity for more activities is available on site within an enclosed courtyard adjacent to the swimming pool enclosure. There is also a lounge, games room and conference room available for activities and socialising. However, active parks are more distant (St Michaels 2,324m, Puarenga Park 1,711m and Centennial Park 1,461m).
87. I note that the carpark is laid out in such a way that the end enclosed by retaining walls could have cars excluded and be set up for basketball, which is a suitable activity for this age group.

Emerald Spa Motor Inn, 284 – 286 Fenton Street, RC18244

88. I have rated this CEH site **unacceptable** for the 6 month to 3 year and 3 to 7 year old age group as the units at ground level open directly onto the carpark central courtyard and units above are accessed up a stairway with a safety barrier.
89. I have lifted the rating to **low** for those in the 8 to 12 year and 13 to 18 year old age groups. Although active park spaces are not close (St Michaels Reserve 991m, Murray Linton Park 734m, McIntyre / Sala

Reserve 1,231m and Puarenga Park 1,426m), these do exist for more independent older children to utilise. Further to this, I also, recently, understand that the Racecourse which is within 500m away, is accessible to the public, hence will be available for these older more independent groups.

90. I note that it could be possible to close off an area of carpark, excluding vehicles, to the left-hand side of the entrance adjacent to the swimming pool enclosure (which will not be used). This fenced off area could then be suitable for use as a basketball area for the older age groups.
91. I have been made aware of a section 92 input by Rotorua Lakes Council Landscape Architect Melanie Cameron with urban design feedback on this site. The report has made suggestions regarding the removal of cars from part of the carpark (via fencing) to increase the size of the communal space. These suggestions align with the suggestion above. I consider that any area within the carpark would be best for the older age groups.

CONCLUSION

92. In my evidence I have established the right of child to play, considered different types of play, related the different types of play to the opportunities and spaces appropriate for different age groups to 'play' in.
93. I have then conducted an assessment of the suitability of the CEH sites, based on what has been established, with respect to each age group and their needs.
94. A summary of my rating assessment of the suitability of each of the Application Sites for play by children of different age groups is set out in a table in Appendix Two of my affidavit.

Sarah Collins

22 September 2022

REFERENCES

IPA_Declaration_FINAL.doc

IPA_Aotearoa_FINAL_Poster

Rotorua Parks and Reserves Network and Rotorua Walkways, Rotorua District Council

Takaro, Investing in Play (Discussion Document) 2017 - Auckland Council

United Nations Convention on the Rights of the Child

<https://www.msd.govt.nz/about-msd-and-our-work/publications-resources/monitoring/uncroc/>

Wellington Play Spaces Policy (2017) - Wellington City Council

World_Parks_Statement_on_Play.pdf

Motel	Park	distance (m)
Lake Rotorua Motel	Karenga Park St	132
Alpin Motel	Murray Linton Rose Gardens	517
Alpin Motel	McIntyre Ave/Sala St Reserve	656
Alpin Motel	Puarenga Park	1523
Alpin Motel	St Michael's Sports Field	2234
Newcastle Motor Lodge	Murray Linton Rose Gardens	126
Newcastle Motor Lodge	McIntyre Ave/Sala St Reserve	571
Newcastle Motor Lodge	St Michael's Sports Field	1720
Newcastle Motor Lodge	Puarenga Park	1345
Pohutu Lodge Motel	Centennial Park	1127
Pohutu Lodge Motel	Murray Linton Rose Gardens	725
Pohutu Lodge Motel	McIntyre Ave/Sala St Reserve	1181
Pohutu Lodge Motel	Puarenga Park	2047
Pohutu Lodge Motel	St Michael's Sports Field	2252
Malones Motel	St Michael's Sports Field	1312
Malones Motel	Murray Linton Rose Gardens	492
Malones Motel	Boyes Park	1045
Union Victoria Motel	Sheaf Park	542
Union Victoria Motel	St Michael's Sports Field	868
Union Victoria Motel	Puarenga Park	1898
Ascot on Fenton	St Michael's Sports Field	457
Ascot on Fenton	Puarenga Park	1488
RotoVegas Motel	Puarenga Park	1447
RotoVegas Motel	St Michael's Sports Field	416
Midway Motel	St Michael's Sports Field	895
Midway Motel	Puarenga Park	1590
Midway Motel	Glenholme Primary School	658
Midway Motel	Saint Mary's Catholic School	614
Midway Motel	Murray Linton Rose Gardens	902
Midway Motel	McIntyre Ave/Sala St Reserve	1399
Geneva Motor Lodge	Murray Linton Rose Gardens	814
Geneva Motor Lodge	St Michael's Sports Field	963
Geneva Motor Lodge	Puarenga Park	1519
Geneva Motor Lodge	Glenholme Primary School	652
Geneva Motor Lodge	Saint Mary's Catholic School	685
Geneva Motor Lodge	McIntyre Ave/Sala St Reserve	1325
Ann's Volcanic Motel	Sheaf Park	818
Ann's Volcanic Motel	Glenholme Reserve	666
Apollo Hotel	Murray Linton Rose Gardens	609
Apollo Hotel	Puarenga Park	1712
Apollo Hotel	McIntyre Ave/Sala St Reserve	845
Apollo Hotel	St Michael's Sports Field	2325
Apollo Hotel	Centennial Park	1416
Emerald Spa Motor Inn	Murray Linton Rose Gardens	734
Emerald Spa Motor Inn	McIntyre Ave/Sala St Reserve	1231
Emerald Spa Motor Inn	Puarenga Park	1426
Emerald Spa Motor Inn	St Michael's Sports Field	991
Rotorua International Motor Inn	Karenga Park	618
Ann's Volcanic Motel	Rotorua Intermediate School	101



LEGEND

Route

- Lake Rotorua Motel
- Park Access

Karenga Park

132m

BENNETTS ROAD

Lake Rotorua Motel

LAKE ROAD

KARAKA STREET

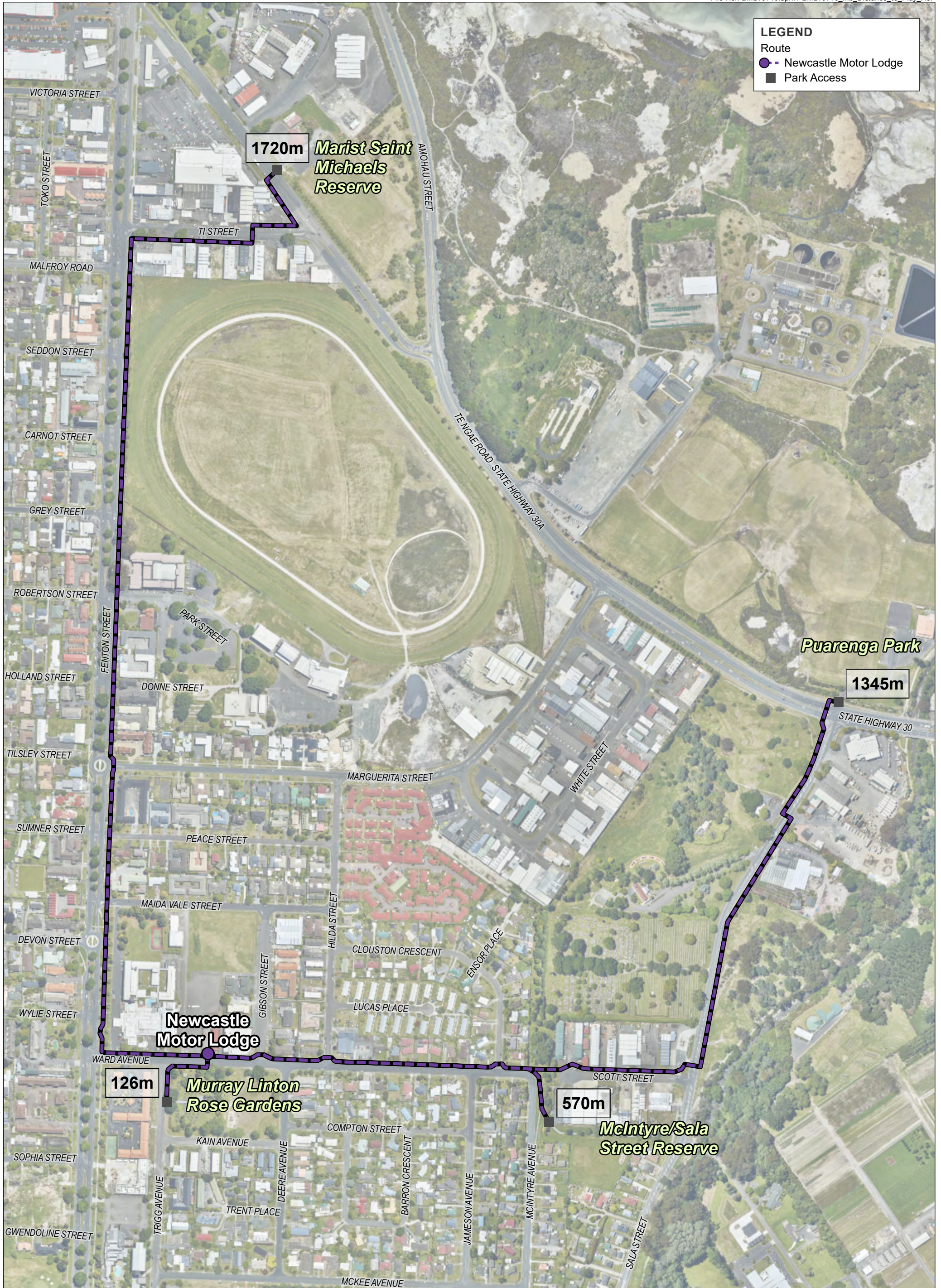
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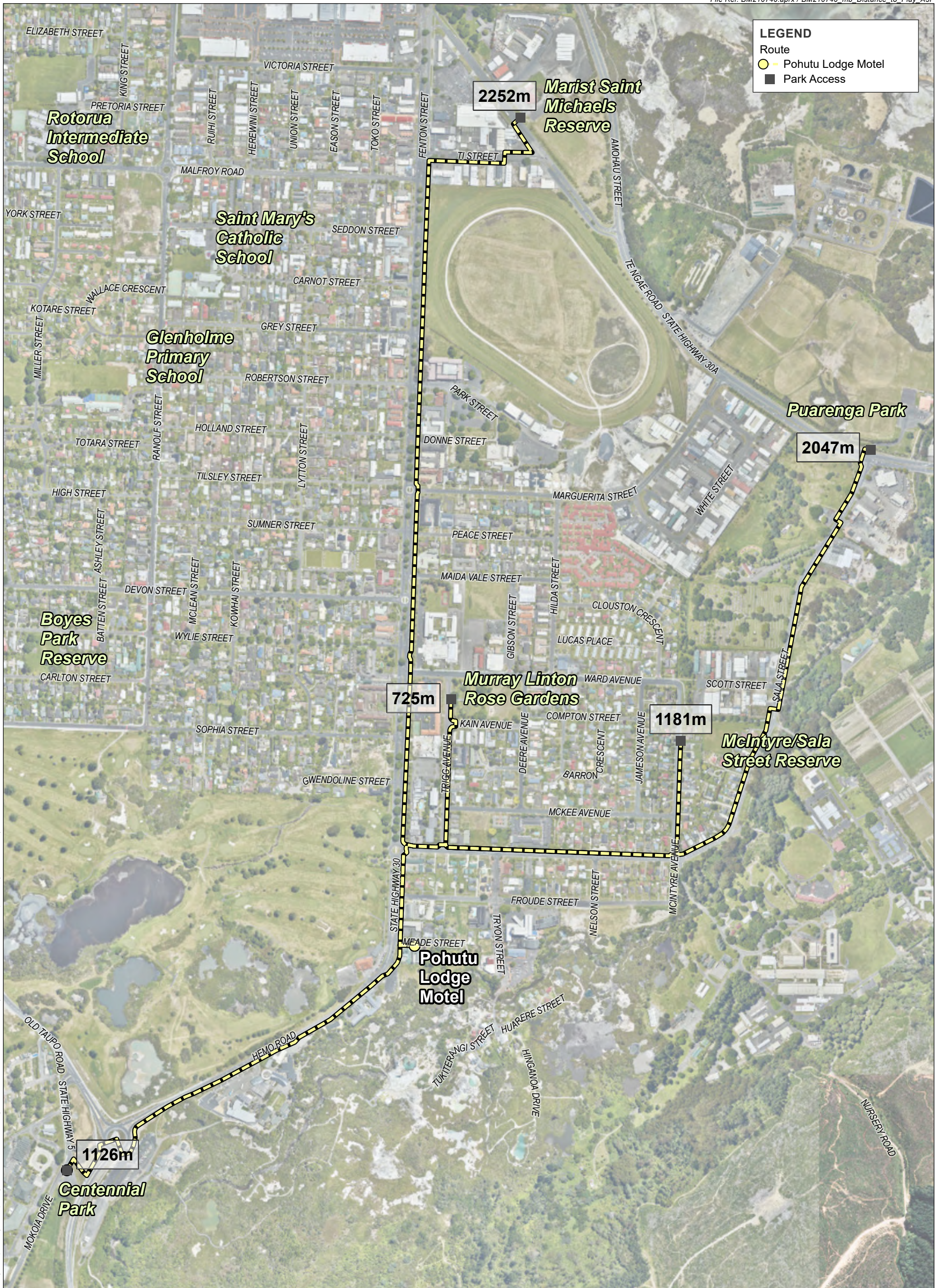
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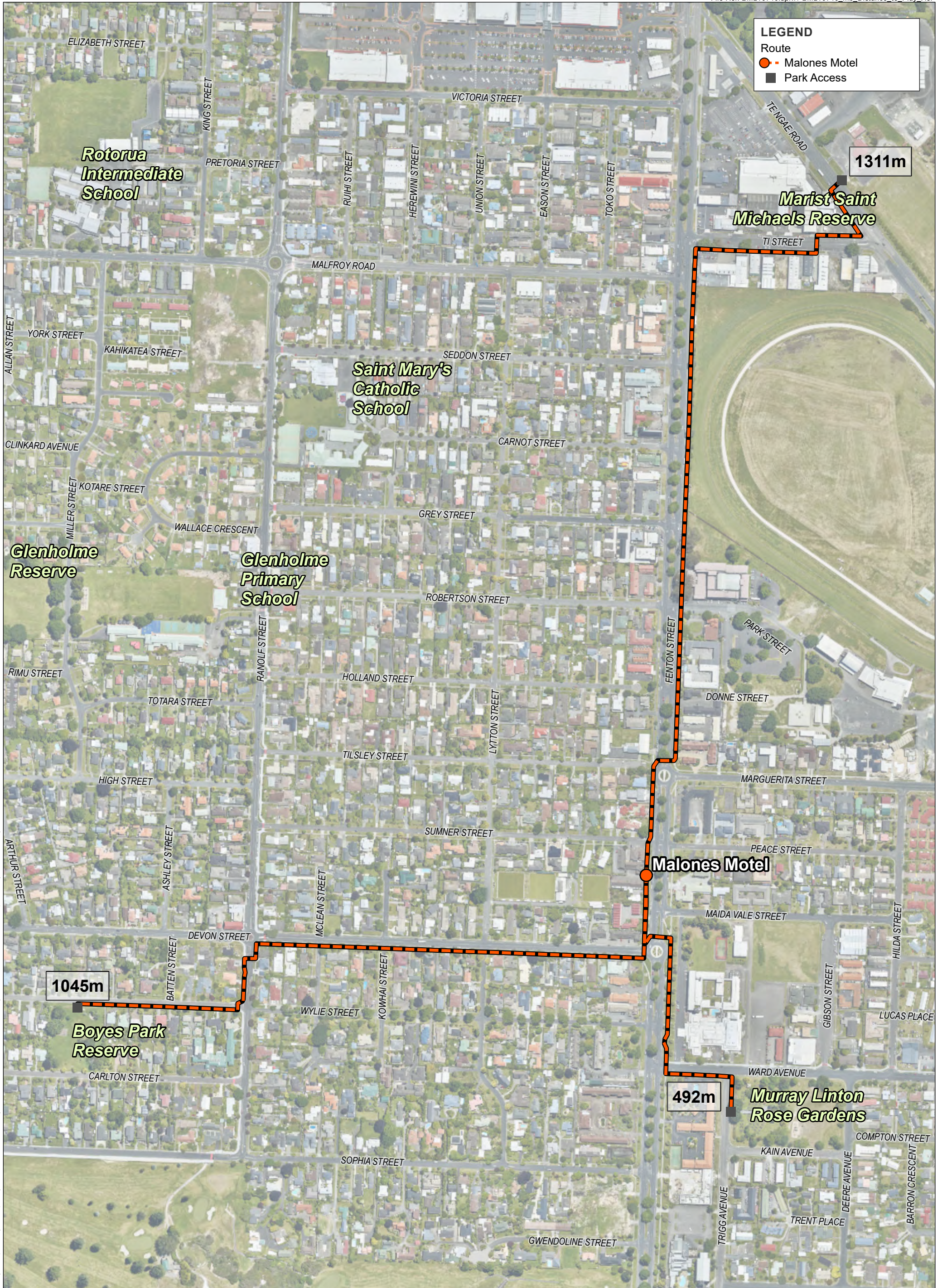
- Route
- Newcastle Motor Lodge
- Park Access



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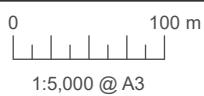
- Route
- Malones Motel
- Park Access

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Data Sources: Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors, Rotorua Lakes Council, Boffa Miskell

Projection: NZGD 2000 New Zealand Transverse Mercator

ROTORUA EMERGENCY HOUSING CONSENT PROCESSING

Distance to Play – Malones Motel

Date: 13 September 2022 | Revision: 0

Plan prepared by Boffa Miskell Limited

Project Manager: Bethany.Bennie@boffamiskell.co.nz | Drawn: HCo | Checked: SCo

LEGEND

- Route
- Union Victoria Motel
- Park Access





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Data Sources: Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors, Rotorua Lakes Council, Boffa Miskell

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LEGEND

Route

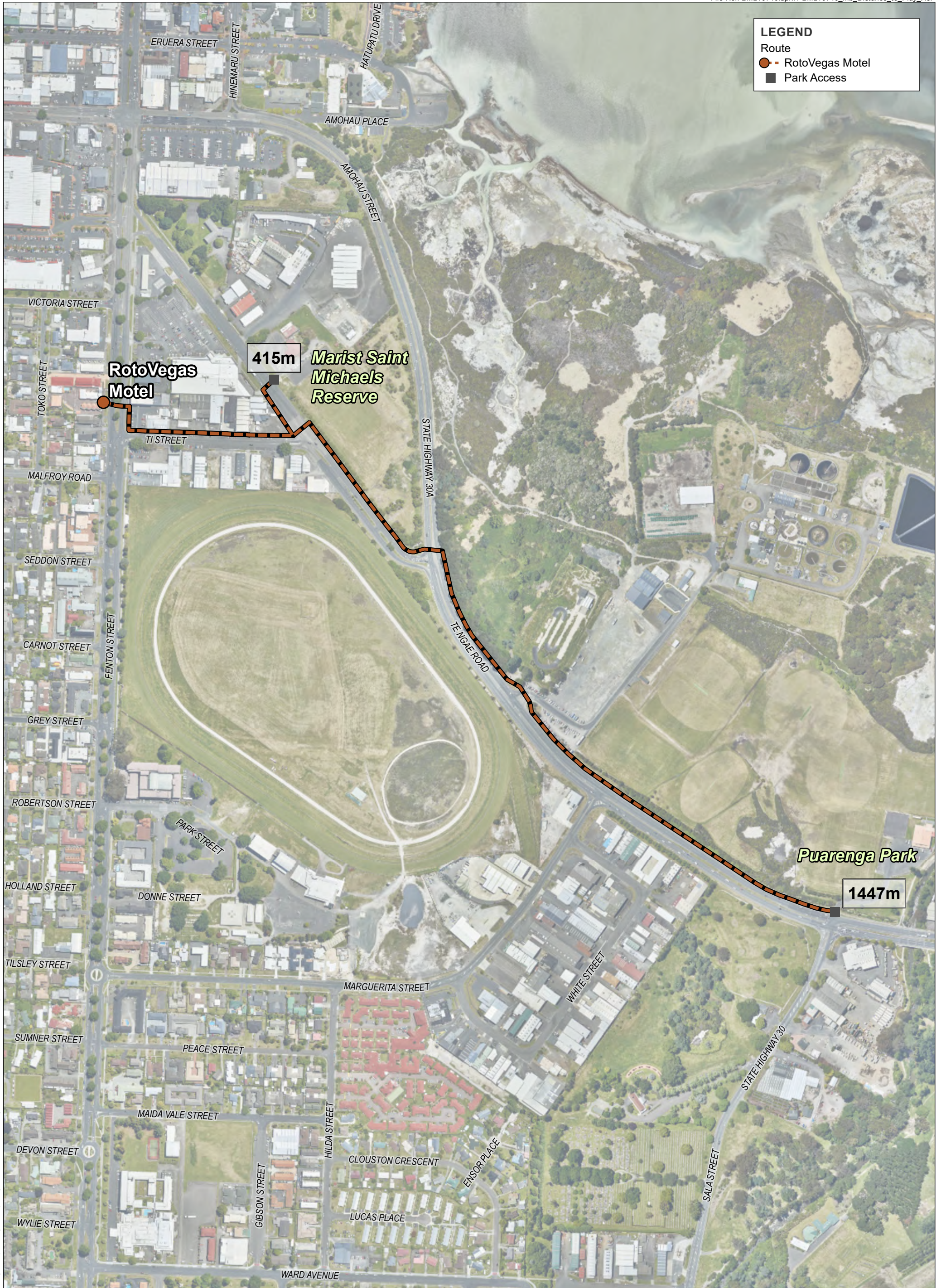
- Ascot on Fenton
- Park Access



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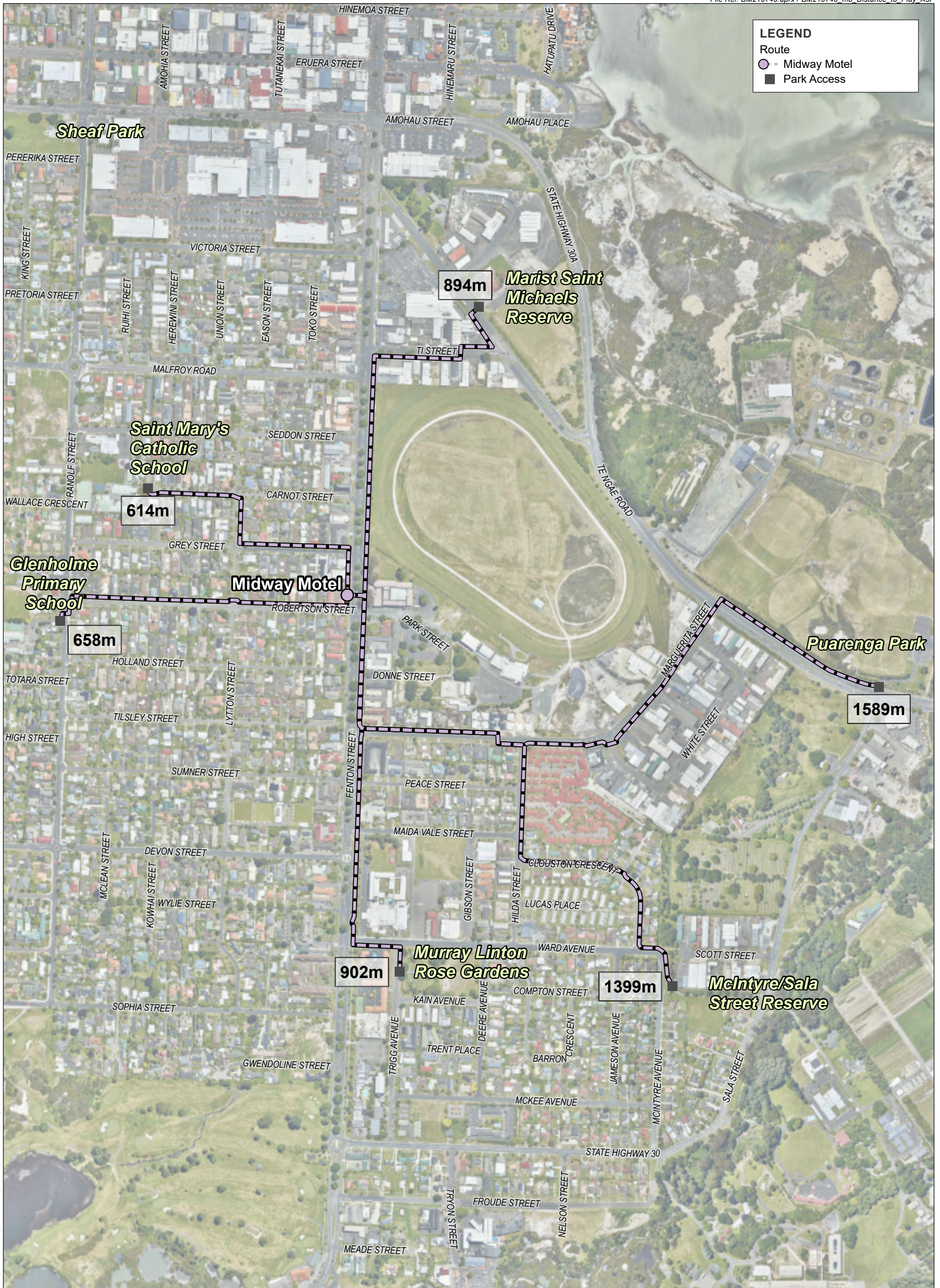
- Route
- RotoVegas Motel
- Park Access



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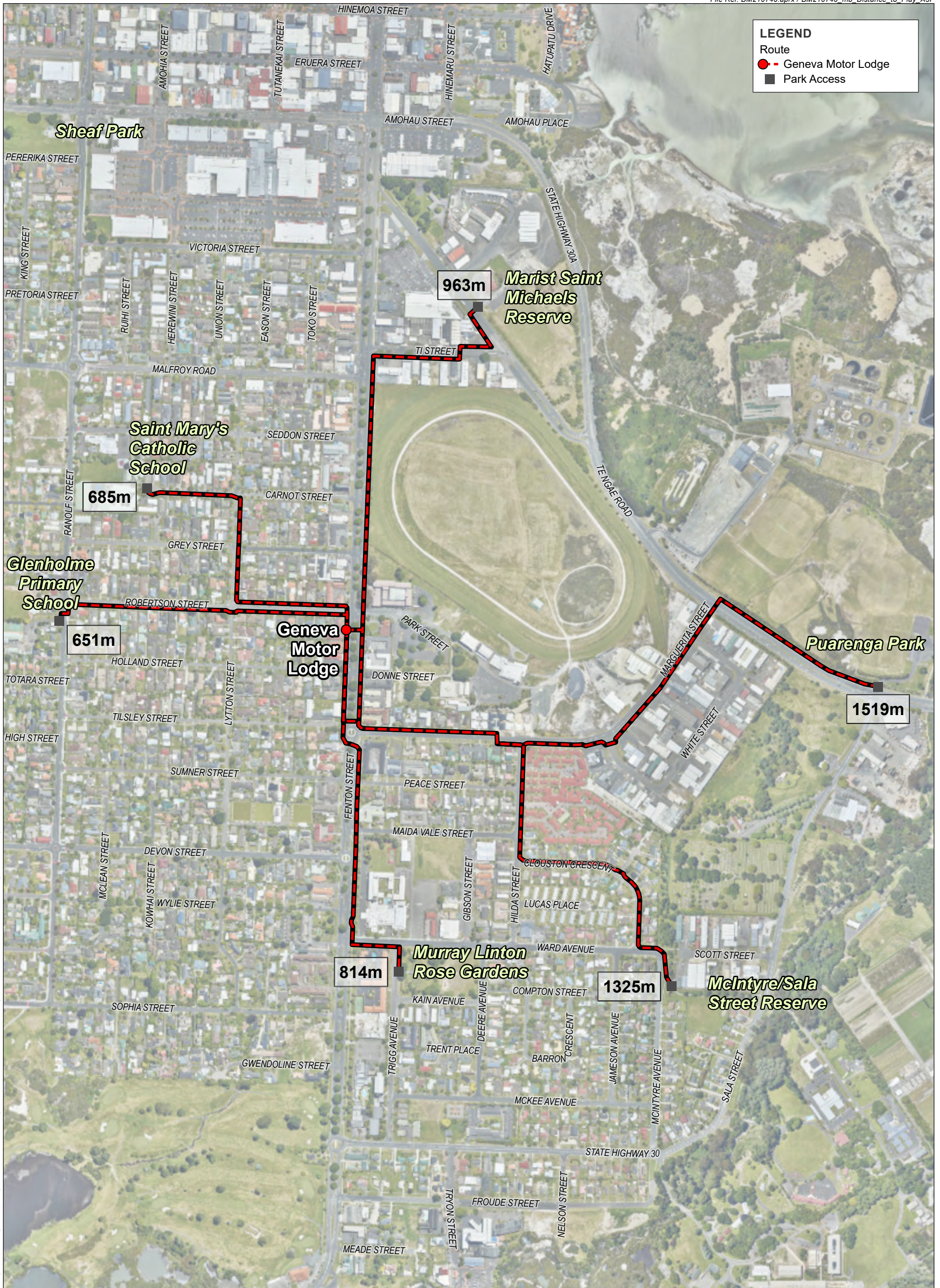
- Route
- Midway Motel
- Park Access



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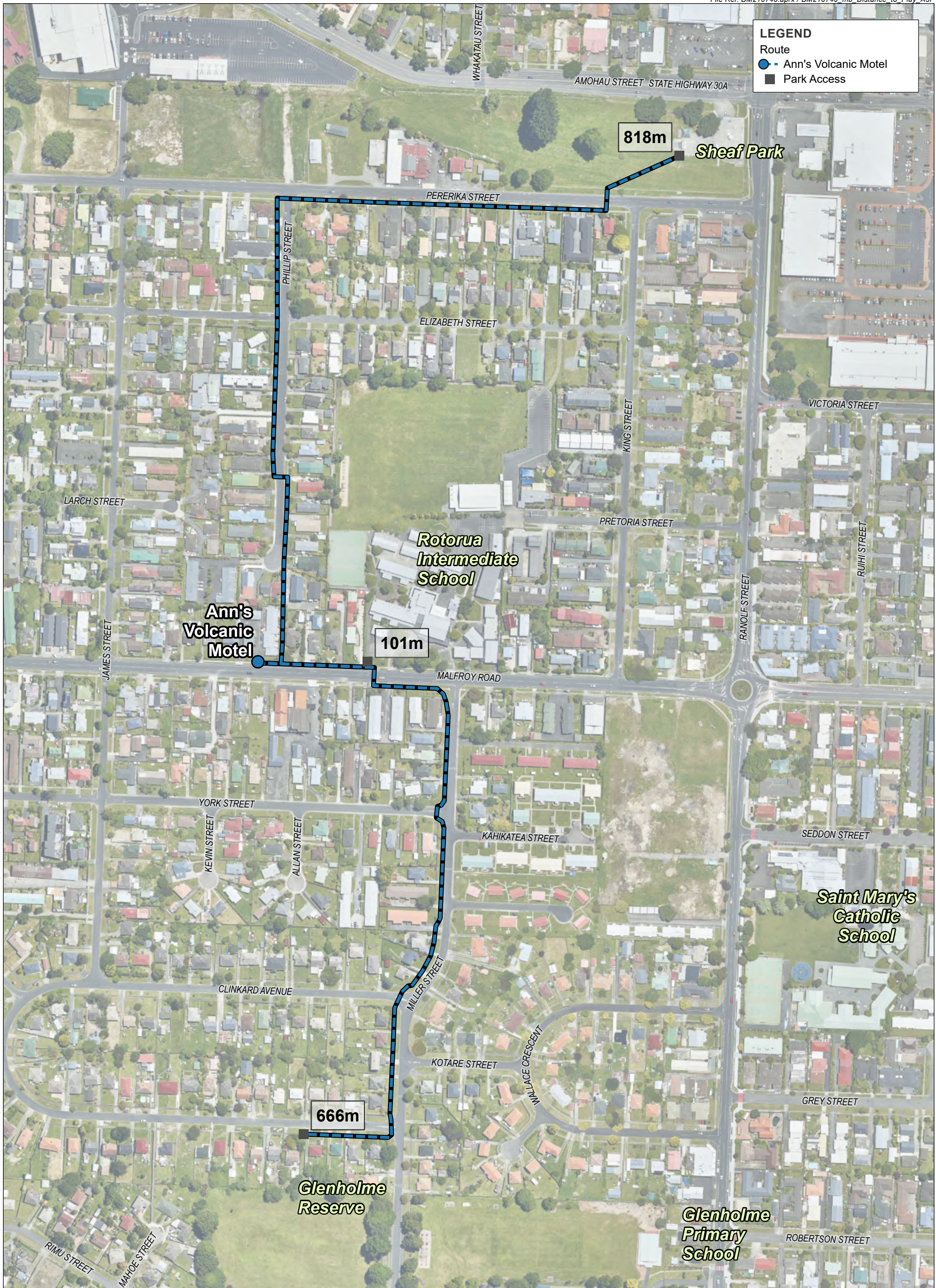
- Route
- Geneva Motor Lodge
- Park Access



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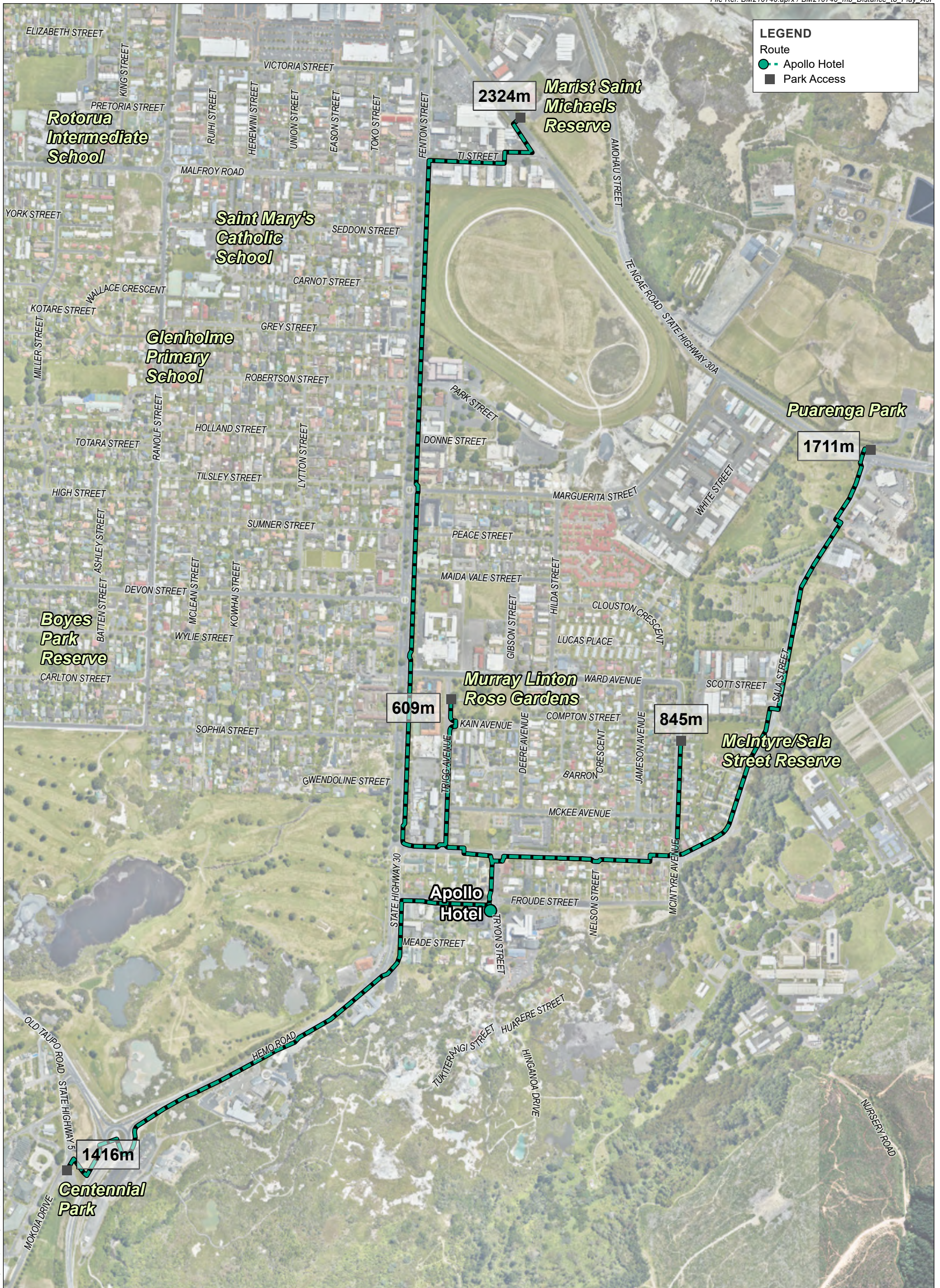
LEGEND

- Route
- Ann's Volcanic Motel
- Park Access



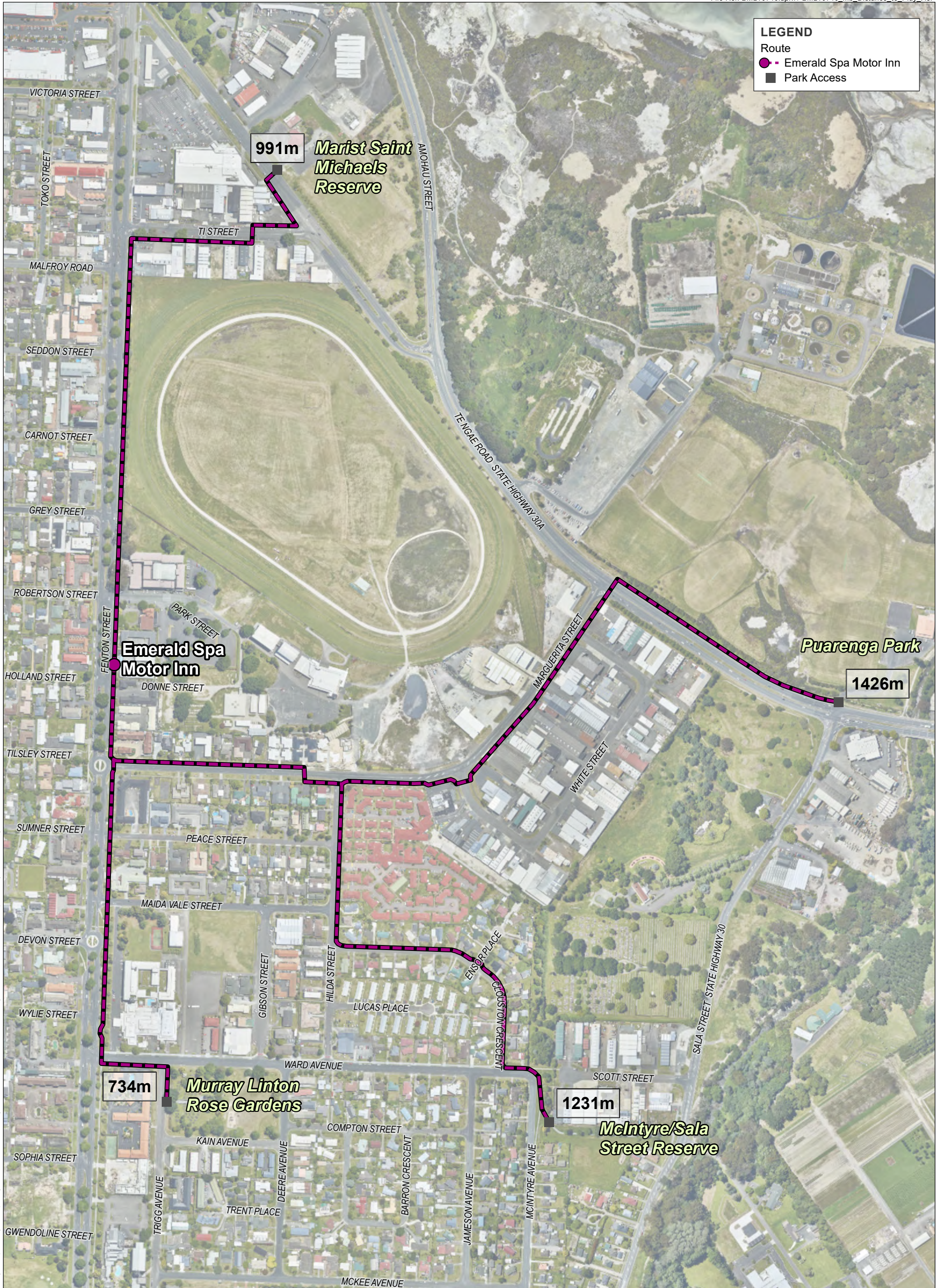
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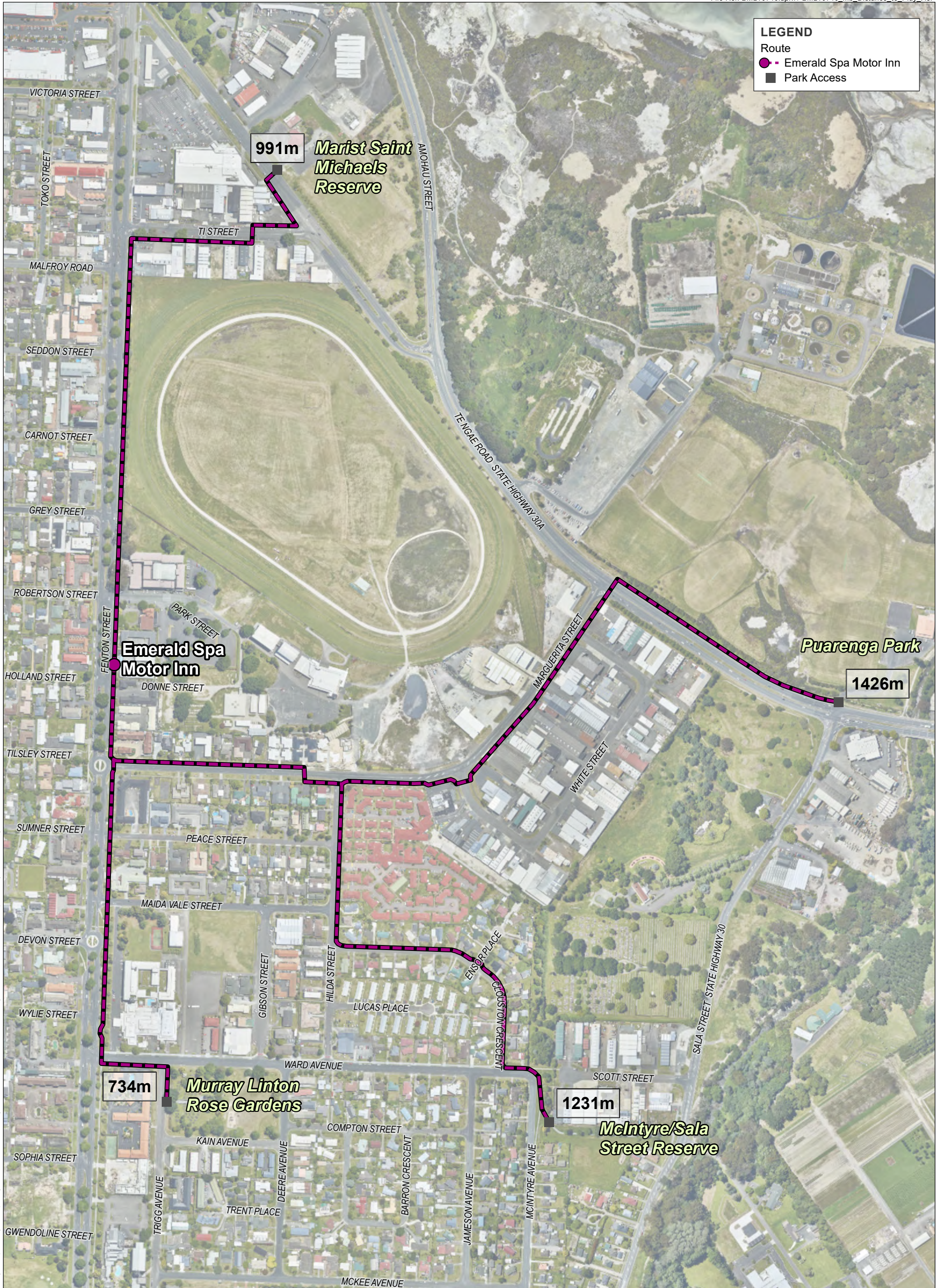
- Route
- Emerald Spa Motor Inn
- Park Access



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LEGEND

- Route
- Emerald Spa Motor Inn
- Park Access



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Key

Level of acceptability	high	moderate	low (bare minimum)	unacceptable
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Child newborn - 6 months, is not mobile and for a short stay to be inside the unit is acceptable.

Situation 1 Lake Rotorua Hotel, 131 Lake Road RC17647

Age of child	North units	
0 - 3 years	moderate	low (bare minimum)
3 - 7 years	moderate	low (bare minimum)
8 - 12 years	high	
13 - 18 years	high	

Situation 2 Alpin Motel, 16 Sala Street RC17648

Age of child	
0 - 3 years	high
3 - 7 years	high
8 - 12 years	high
13 - 18 years	moderate

Situation 3 New Castle, 18 Ward Avenue RC17650

Age of child	4 at rear & GL	
0 - 3 years	low (bare minimum)	moderate
3 - 7 years	low (bare minimum)	moderate
8 - 12 years	low (bare minimum)	
13 - 18 years	moderate	

Situation 4 Pohutu, 3 Meade Street RC17661

Age of child	2 storey	Studio units
0 - 3 years	low (bare minimum)	unacceptable
3 - 7 years	low (bare minimum)	unacceptable
8 - 12 years	unacceptable	
13 - 18 years	low (bare minimum)	

Situation 5 Malones Motel, 321 Fenton Street RC17662

Age of child	
0 - 3 years	unacceptable
3 - 7 years	unacceptable
8 - 12 years	low (bare minimum)
13 - 18 years	low (bare minimum)

Situation 6 Union Victoria, 26 - 28 Victoria Street RC17673

Age of child	
0 - 3 years	unacceptable
3 - 7 years	unacceptable
8 - 12 years	low (bare minimum)
13 - 18 years	low (bare minimum)

Situation 7 Ascot on Fenton - 247 Fenton Street and 12 Toko Street RC17887

Age of child	Trampoline provides something but will require supervision.	
0 - 3 years	unacceptable	
3 - 7 years	unacceptable	
8 - 12 years	low (bare minimum)	
13 - 18 years	low (bare minimum)	

Situation 8 Roto Vegas - 249 Fenton Street and 16 Toko Street RC17889

Age of child	
0 - 3 years	GL high
3 - 7 years	Upper FI low (bare minimum)
8 - 12 years	Upper FI low (bare minimum)
13 - 18 years	moderate

Situation 9 Midway Motel - 293 Fenton Street RC17890

Age of child	
0 - 3 years	high
3 - 7 years	high
8 - 12 years	moderate
13 - 18 years	moderate

Situation 10 Geneva Motor Lodge - 299 Fenton Street RC17891

Age of child	Downstairs	Upper storey, NB proposal is older people not families upstairs
0 - 3 years	GL moderate	9 - fourteen unacceptable
3 - 7 years	GL low (bare minimum)	9 - fourteen unacceptable
8 - 12 years	low (bare minimum)	
13 - 18 years	low (bare minimum)	

Situation 11 Ann's Volcanic Motel - 107 Malfroy Road RC17892

Age of child	NB: green units 1 - 6	
0 - 3 years	high	7 - ten unacceptable
3 - 7 years	high	7 - ten unacceptable
8 - 12 years	moderate	7 - ten unacceptable
13 - 18 years	moderate	7 - ten unacceptable

Situation 12 Apollo Hotel - 7 Tryon Street RC17893

Age of child	
0 - 3 years	low (bare minimum)
3 - 7 years	Upper level unacceptable
8 - 12 years	Upper level unacceptable
13 - 18 years	moderate

Situation 13 Emerald Spa Motor Inn, 284 - 286 Fenton Street RC18244

Age of child	
0 - 3 years	unacceptable
3 - 7 years	unacceptable
8 - 12 years	low (bare minimum)
13 - 18 years	low (bare minimum)