

BEFORE THE INDEPENDENT HEARINGS COMMISSIONER

UNDER the Resource Management Act 1991

IN THE MATTER of seven land use consent applications to use tourist accommodation for contracted emergency housing

BETWEEN **TE TŪĀPAPA KURA KĀINGA - MINISTRY OF HOUSING AND URBAN DEVELOPMENT**
Applicant

AND **ROTORUA LAKES COUNCIL**
Consent Authority

AND **SUBMITTERS**

STATEMENT OF EVIDENCE OF MATHEW ALAN PEACOCKE

Dated 9 / 10 / 2024

TOMPKINS | WAKE

Solicitor: Theresa Le Bas
Theresa.LeBas@tompkinswake.co.nz

Counsel: Kahlia Goss
kahlia.goss@tompkinswake.co.nz

1105 Arawa Street
PO Box 248
Rotorua 3040
New Zealand
Ph: (07) 347 9466
Fax: (07) 347 9500
tompkinswake.com

INTRODUCTION

1. My full name is Mathew (Matt) Alan Peacocke.
2. I hold the qualification of Bachelor of Landscape Architecture (First Class Honours) from Lincoln University. I am a registered member of the New Zealand Institute of Landscape Architects.
3. I am a Principal Landscape Architect at Boffa Miskell Limited and have been a practising landscape architect for 15 years, having worked at Boffa Miskell since 2018. Prior to this, I was a Senior Landscape Architect at Beca Group Limited for two years and was, before that, employed by Isthmus Group Limited for six years, and KamoMarsh for one year. I also have two children, aged six and nine years respectively.
4. In my professional career I have been involved in a wide variety of outdoor public spaces in all stages of design; from site analysis; masterplanning, engagement, concept, detail design, and overseeing implementation. These include, but are not limited to parks, retirement villages, subdivisions, schools, walkways, cycleways, and playgrounds. Playgrounds and 'play' have been one of my specialities throughout my career, in all sizes and forms, including destination playgrounds, local playgrounds, school playgrounds, opportunities for informal and happenstance play, play within recreational reserves, and even play within retirement villages to improve social connections with the elderly and their families and visitors.
5. Landscape architects are trained to review and respond to how people connect and socialise and interact with the landscape as a key response to how the site is designed and used. Children play a significant part in that consideration. I am also part of a playground working group within Boffa Miskell which regularly meets to discuss research and opportunities with play.

PURPOSE OF THIS EVIDENCE

6. This evidence focuses on 'The Right of the Child to Play' within the context of the seven land use consent applications to use tourist accommodation to provide contracted emergency housing (**CEH**) for vulnerable individuals and families, who otherwise have no accommodation. Where children and young people are involved, the suitability of the tourist accommodation facilities for play, requires consideration. This evidence looks at each of the seven facilities and assesses whether a child or youth has availability to appropriate play space, for their age, both within the emergency accommodation and its surrounds, for a period of up to twelve months maximum. This is upon the understanding that 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.

CODE OF CONDUCT

7. Although not necessary in respect of council hearings, I can confirm I have read the Expert Witness Code of Conduct set out in the Environment Court's Practice Note 2023. I have complied with the Code of Conduct in preparing this evidence and I agree to comply with it while giving oral evidence before the Independent Hearings Commissioner appointed by Rotorua Lakes Council (**Council**). Except where I state that I am relying on the evidence of another person, this written evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed in this evidence.

METHODOLOGY

8. This evidence forms a response to the CEH, using the framework and methodology outlined in the Memorandum Report provided and assembled by myself and Sarah Collins (Partner, Landscape Architect of

35 years, and play expert from Boffa Miskell). The Memorandum Report is attached to my evidence as **Annexure A**, and includes the following:

- (a) What play is defined as;
 - (b) Where play happens;
 - (c) Why play is important;
 - (d) What happens when children do not have the opportunity to play;
 - (e) What play activities are appropriate to different age groups; and
 - (f) What type of outdoor space is ideal for each age group to have adjacent to their accommodation for the type of play they require.
9. I have presented information showing the emergency housing accommodation locations together with the distance to local reserve spaces (in plans and in tabular format) in **Annexure B**.
10. For the purposes of the Memorandum Report, the maps indicate general walking distances based on 5, 10, and 15 minute walks. The generally agreed 'easy walking distance' is 600m and is shown on the maps in Annexure B as a dotted red line. However, it is noted that 10 minutes' walking is still considered reasonable, and 15 minutes' walking is still considered accessible for the more senior youth groups.
11. The Report then considered the locations and the makeup of each emergency housing accommodation, using the methodology outlined in Annexure A.
12. A summary of findings, which presents the rating of the suitability of each individual emergency housing accommodation, is set out in a spreadsheet in **Annexure C**.

FINDINGS

Lake Rotorua Hotel, 131 Lake Road, LU24-010190

13. I have rated this facility '**moderate**' for children six months to three years and three to seven years, where there is the opportunity to get outside to the lawn from the units on three sides, but the space from each unit is not secure. 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 therefore I have dropped the rating for these units to '**low**'. On the opposite side of all units, there is a courtyard with a well-formed pedestrian path around it. There is parking around this courtyard and a separate fenced courtyard where people can meet, plus a lawn area to the north-east of the site.

14. I have rated the facility '**high**' for the eight to 18 year old age groups. 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. In addition to the space adjacent to the site, Karenga Park is in the order of 135m away – well within the 600m easy walking distance agreed to in the Report. Children can walk there with adult supervision or this can be used as a further place for independent social games for those who are more independent. Karenga Park includes a large and varied grassed area, informal sports, a playground and skatepark.

15. I note that one of the submissions (Submitter #34) raises the issue that outdoor play spaces for children is 'effectively non-existent' at this site. My findings of '**moderate**' to '**low**' for the ages zero to seven years means I agree with this submission in general. However, I have not rated the site 'unacceptable' because there is some outdoor space, and the suitability for older more independent youths is high for the reasons noted in

paragraph 14 above. Further, I note that the Lake Road boundary of this site is now fully fenced and no longer a vehicle entrance, thereby reducing safety concerns. I also confirm that, as recommended by Ms Collins in her evidence presented during the 2022 hearing,¹ a separated walkway to the grassed area has been implemented by way of bollards between Units 1-12.

16. In order to improve safety for the younger children (six months to seven years), I recommend the addition of a return fence at both ends of the grass area for Units 30-38. This will fully enclose the units' respective outdoor living areas to the north-west (adjacent to Bennetts Road).

Ascot on Fenton, 247 Fenton Street and 12 Toko Street LU24-010188

17. I have rated this facility as '**unacceptable**' for children six months to seven years because the outdoor space on site is used for vehicle access and does not provide a safe space for children in this age group. The Memorandum Report notes there is no outdoor space associated with each unit. The premises is two storey and units are accessed from a central vehicle-dominated courtyard, with no access to the rear of the units. The trampoline which has been squeezed in between the two motel units is of limited value, however it is the only real space to get outside and be active. I recommend the trampoline be retained as it may allow up to four supervised children to be active outside.
18. I have rated the facility '**low**' for the eight to 18 year old age groups, because there is no space on site for children in these age groups to gather. St Michael's Reserve Sports Park is 10-15 minutes' walk from the site, however it requires crossing Fenton Street (a busy arterial road). This reserve could allow active recreation or other group activities for these age groups as they are older and more independent.

¹ Statement of Evidence of Sarah Collins dated 22 September 2022, at paragraph [56].

19. I note that there is a youth centre (Taiohi Tūrama: Rotorua Centre for Youth) within the agreed 600m distance, however this is not easily accessed as it still requires crossing Fenton Street, or alternatively walking to the Amahou Street pedestrian lights. There is a potential for the youth centre to have an arrangement with the facilities, catering for the 13 to 18 year old youths which would lift the rating for that age group to 'moderate' on the basis that they would have a nearby area to socialise and engage with peers of their own age.
20. Puarenga Park is also accessible from the site at over 15 minutes' walk away, however again this also requires crossing Fenton Street.

Roto Vegas 249 Fenton Street and 16 Toko Street LU24-010192

21. I have rated this facility '**high**' for children six months to seven years who live in the two ground floor units to the south-west of the main site and the three units at 8A, 8B & 10B Toko Street, and '**low**' for the upper floor units. Each of these ground floor units have direct access to outdoor space. Within this site, there is a shared open space with play equipment and a games / pool room with a BBQ area, across the carpark.
22. The above opportunities have led to me rating the facility '**moderate**' for the eight to 18 year old age groups. This rating is based on access to the shared facilities on site.
23. St Michaels Reserve Sports Park is 415m away from the site, although it requires crossing Fenton Street (a busy arterial road). Puarenga Park sports fields is 1500m away, or 15 minutes' walk, and also requires crossing Fenton Street.
24. Similar to the site previously discussed, there is a potential for the youth centre to have an arrangement with the facilities, catering for the 13 to 18 year old youths and providing a nearby area to socialise and engage with peers of their own age.

25. Units 1-6, 12-15, 22 and 23 appear to have no direct outdoor space where a door can be left open to a grassed area. These units are therefore deemed **'unacceptable'** for children aged 6 months to three years, and **'low'** acceptability for children aged three to seven years.

Geneva Motor Lodge, 299 Fenton Street, LU24-010189

26. I have rated this facility **'unacceptable'** for children in the six months to seven years age groups, in the upper storey units. I have lifted the rating to **'moderate'** for one of the eight ground floor units which has a small courtyard.
27. I have rated this facility **'low'** for children three to seven years on the ground floor, where there is a small outdoor space directly associated with the units. Murray Linton Park and playground is over 800m distance from the site and involves crossing Fenton Street. This is not within the agreed 600m easy walking distance, but it is possible for supervised children in this age group to walk to this park.
28. I have rated this facility **'low'** for the eight to 18 year old age groups, where children in these age groups need more space and this is not highly accessible.
29. Neighbourhood play space at Murray Linton Park is over 800m distance, or 15 minutes' walk. Sports parks are even more distant with St Michaels Sports Park being almost 1km away, just within the 15 minute reasonable walking distance, and Puarenga Park sports fields being 1.5km away, which is deemed too far to reasonably walk to.

Alpin Motel, 16 Sala Street, LU24-010186

30. I have rated this facility **'high'** for children in the six months to 12 year age groups, where each unit has a small, fenced private courtyard directly outside, making it safe for small children. There is also the opportunity to

move from this small courtyard into a central courtyard with lawn, from all units. The central courtyard is large enough to provide for more independent older children as well as the younger age groups. This area is also separate from cars which circulate on the outside of the units, with each unit having a carpark at its door. The Murray Linton Park Rose Garden is within the agreed 600m easy walking distance and McIntyre / Sala Street Reserve is just over the 600m distance.

31. 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 are over 1.5km away and St Michael's Reserve is over 2km away. However, both parks are more suitable for the older age groups and both are considered further away than ideal walking distances.

Apollo Hotel, 7 Tryon Street, Rotorua, LU24-010187

32. I have rated the units at this site '**low**', and for upper levels '**unacceptable**' for the younger age groups (six months to seven years), where the outdoor space is dominated by a pool and is hard surface. Although the 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 Park are approximately 600m away, which is within the agreed easy walking distance, and McIntyre / Sala Street is over 800m, or 10-15 minutes' walk.
33. I have lifted the rating to '**moderate**' for the eight to 18 year 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.

34. Active parks are more distant from the site – St Michaels is over 2km, Puarenga Park is almost 2km and Centennial Park is 1.5km.
35. 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.

Pohutu Lodge, 3 Meade Street, LU24-010191

36. I have rated this facility '**low (& almost unacceptable)**' for children in the six months to seven year old age groups, 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 'low' rating and the area is to be safe for small children.
37. I have dropped the rating to '**unacceptable**' for those in the eight to 12 year old age group, where there is no space on site nor nearby for young people who are becoming more independent. Other units on site are studio only and there is no opportunity to get outside into a central courtyard as the outdoor space is fully utilised as a carpark.
38. 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.
39. The nearest active sports park is Centennial Park which is over 1km distance and not easily accessible by walking. While older children may reach this, it is accessed along a busy State Highway with no safe pedestrian crossing. Other parks are outside the easy walking distance. For example, Murray Linton Rose Garden (over 700m away), McIntyre / Sala Street Reserve (over 1km away), St Michael's Sports Park and Puarenga Park sports fields (both over 2km).

CONCLUSION

40. My evidence focuses on 'The Right of the Child to Play' within the context of the seven land use consent applications to use tourist accommodation to provide CEH for vulnerable individuals and families, who otherwise have no accommodation. Where children and young people are involved, the suitability of the tourist accommodation facilities for play requires consideration.
41. The Memorandum Report prepared by myself and my colleague Ms Collins, included as Annexure A, looks at the importance of 'play' and outlines the different activities appropriate for different age groups and the types of outdoor activities ideal for each age group to have nearby for the type of play they require, providing a basis for the considerations and evidence.
42. Using the methodology from the Memorandum Report, I have considered the location (with respect to distance to local reserve spaces) and make up (with respect to appropriate play spaces for different age groups) of each emergency housing facility. I have then assigned each facility a rating of suitability for children within the age groups of six months to three years, three to seven years, eight to 12 years and 13 to 18 years.

Matt Peacocke

09 / 10 / 2024

Annexure A – Memorandum Report

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| <input type="checkbox"/> Whangarei
Level 1
BDO Business Centre
15 Porowini Avenue
Morningside
Whangarei 0110
+649 358 2526 | <input checked="" type="checkbox"/> Auckland
PO Box 91250
Auckland 1142
+649 358 2526 | <input type="checkbox"/> Hamilton
PO Box 1094
Hamilton 3240
+647 960 0006 | <input checked="" type="checkbox"/> Tauranga
Level 5
35 Grey Street
Tauranga 3110
PO Box 13373
Tauranga 3141
+647 571 5511 | <input type="checkbox"/> Wellington
PO Box 11340
Wellington 6142
+644 385 9315 |
| <input type="checkbox"/> Nelson
27 Vanguard Street
Nelson 7010
+643 548 8551 | <input type="checkbox"/> Christchurch
PO Box 110
Christchurch 8140
+643 366 8891 | <input type="checkbox"/> Queenstown
PO Box 1028
Queenstown 9348
+643 441 1670 | <input type="checkbox"/> Dunedin
49 Water Street
Dunedin 9016
+643 470 0460 | |

Title: Rotorua Lakes Play Opportunities Methodology Report

Attention: Rotorua Lakes Council

Date: 16.09.2024

From: Matt Peacocke Principal Landscape Architect & Sarah Collins Partner, and Landscape Architect, both of Boffa Miskell Ltd.

1. Assessing the suitability of sites proposed for contracted emergency housing for households with children

1.1 Introduction

This report has been prepared in order to assist with providing advice on the opportunity for children to play in the context of the provision of contracted emergency housing (**CEH**) for families and whānau with children, young people and people with disabilities.

We understand that the need for emergency housing is high in Rotorua at present, and the supply of emergency housing through tourist accommodation is already operating.

We further understand that Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development (**MHUD**) has applied to continue to use seven sites and existing buildings for CEH, for a period of one year from the expiry of the existing CEH resource consents. In addition, it is understood that each motel contracted has a contracted service provider who:

- Carries out an assessment of the immediate needs of the client or whānau and arranges any necessary services to meet those needs.
- Meets regularly and works with each client or whānau to identify and manage issues that arise in relation to their stay in CEH.
- 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.
- Assists in the transition to more permanent housing options where these are available.

We, however, believe that if children are to live in these emergency housing facilities, it is essential that children have opportunities to play. It is therefore important to assess the suitability of sites for play and to provide a framework for assessing the suitability of sites for households which include children.

1.2 Play discussion

New Zealand, as a member of the United Nations, recognises the rights of the child through being a signatory to the Convention of the Rights of the Child (**UNCRC**).

The UNCRC opened for signature on 20 November 1989 and New Zealand ratified UNCRC on 6 April 1993.

It is Article 31 of UNCRC which establishes that ‘the right of the child to play is a human right’:

Article 31

1. *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.*
2. *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.*

Given that in New Zealand we have made a commitment to allowing children to engage in play and recreational activities appropriate to their age, we have a responsibility to ensure a safe environment in which to play or access to a wider environment in which play can take place.

1.2.1 What is the definition of play?

“Play is what children and young people do when they follow their own ideas and interests in their own way and for their own reasons”.¹

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.

“Intent” is the key difference in the play of children and adults or those supporting the young people who have a role in fostering and providing for the opportunity to play. 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 versions of “play”.

1.2.2 Where does play happen?

Ideally, play is able to happen in a range of spaces. At a very young age prior to beginning to walk, much playtime is spent indoors. As the child grows and begins to explore outdoors, the ideal situation is where there is a safe opportunity to play immediately outdoors. As they grow, opportunities flow on from the indoor to the outdoor area, and from informal settings through to formal play spaces.

Whilst ideally the opportunity for young children to play would be provided within a safe environment that flows directly out from within the living accommodation, incidental play can be anywhere. This is immediately apparent if one walks anywhere with a 3-year-old; a young child will find an incidental space to play, anywhere.

Anywhere can mean a backyard, front yard, road verges, but also 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. It can also be 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.

¹ Wellington Play Spaces Policy, 2017.

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, 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.

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 to allow the investment in these spaces to be assessed and prioritised.

Destination play spaces are ones which people typically travel to get to. They are visited less frequently, but have the widest range of equipment and provide for a wide range of ages and abilities and facilities. Rotorua Lakefront play space is a destination playground.

Neighbourhood or local parks are generally established to meet the needs of the local community, hence one should 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 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 and observe and socialise. An often-quoted ideal distance for walking to a local park is within 600 metres – which is between 5 and 10minutes' walk.

There are also other small reserve spaces within a city which might be called doorstep play spaces. Often these are left over areas, maybe they are the size of a vacant lot or a wide berm in a residential street or even a quiet blind end street. They do not generally contain any equipment, but there may be a basketball hoop or space to kick a ball. Such spaces can provide an opportunity for older children in a less supervised setting close to home.

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 provide open space which offers the opportunity for informal play within nature or the outdoors and generally includes seating space. Many park spaces provide a playground and there are also sports fields and skateparks.

1.2.3 Why is play important?

Regionally, nationally, and internationally research shows that play is important for the development, health and well-being of children. It is evident that the wider benefits of play have a very broad reach, including social and environmental.

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 and different challenges and, in a social setting, will interact as they play with other children and adults in different places. Through their play, they will discover what they can and cannot do.

There is a growing body of evidence to support that there is benefit in connection with nature and the benefits of outdoor play. Play for children in natural environments is considered to include:

- Improved ability to judge and understand risk as they learn about risk as they take risk throughout their years of learning.
- Increased physical health through exercise.
- Enhanced mental health and maintaining positive well-being through exposure to the natural world.
- A stimulated imagination and creativity through outdoor play and learning.
- Improved communication skills and the ability to build and maintain relationships.

1.2.4 Play deprivation – what happens when children do not play?

The impacts of being deprived the opportunity to play are widely recognised. We quote the following from the IPA World Declaration, to illustrate what is known about the consequences of being deprived of the opportunity to play:²

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.

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.

1.2.5 What play activities are appropriate to different age groups?

Play theory defines the types of play that are applied to different age groups to maximise the potential benefit of the child.

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 them, limited to the immediate environments and largely indoors. It is important to have the opportunity to be outdoors, looked after by the carer. The specific play activities for the different age groups are discussed in turn below.

Toddlers (aged from 6 months to approximately 3 years) – generally with the carer nearby (often guiding the play). In their earliest months, most play will be inside the home, but as a child grows opportunities become more important within the outdoor environment. 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 (birds for example).

Junior children (approximately 3 to 7 years) – as children grow the play becomes more child directed and, at this age, generally with parents in attendance. Activities include running, climbing, agility skills, skipping and playing with a ball. Opportunities for dramatic play and use of their imagination, including using loose materials such as sand, water and vegetation including collecting things such as seeds, leaves, plant seed stalks etc. In park spaces, the provision of small-scale spaces for mastering a range of skills including skateboards or roller skates and tricycles, graduating to bicycles.

Older children (approximately 8 to 12 years) – opportunities for highly varied play, potentially unsupervised. There is a need and desire for physical challenges, to enable them to master skills, including

² International Play Association, Declaration on the Importance of Play dated 2014.

bicycle tracks and skateboard areas. As children grow there is 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.

Youth (from around 13 to 18 years or older) – a much greater desire to master new skills and games, taking 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 that it be used.

1.2.6 What type of outdoor space is ideal for each age group to have adjacent to their accommodation for the type of play they require?

Toddlers (aged from 6 months to approximately 3 years)

Within the housing complex, a fenced outdoor space accessed from the living unit with lawn and space suitable to crawl, walk, run, and roll on – an outdoor space 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 this age.

Junior children (approximately 3 to 7 years)

Within the housing complex, a safe, fenced outdoor space (preferably accessible from the living unit) which has both lawn and hard surface areas where the child can begin, with supervision, to develop their skills, explore and challenge themselves. A park within walking distance becomes more important, as they (with supervision) need 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)

Within the housing complex, it is important for children to be able to access outdoor space, where they can safely meet and socialise. However a nearby park, which has space for ball games, bike track or skate park, becomes much more important. Ideally, these would be within a 600m walking distance on a safer local road, to allow the freedom to access without a carer, on occasion.

Youth (from around 13 to 18 years or older)

Within the housing complex, it would be ideal for youths to be able to socialise in outdoor space. However, places to test physical ability, seek thrills, compete and parade or just muck around, means space beyond the complex becomes of greater importance. The access to park space for physical challenge and competition means that a greater distance is acceptable.

2. Length of stay in CEH

We understand that, ideally, the length of time that whānau with children would stay in the CEH is minimised and no longer required, when circumstances change or a more suitable permanent solution is found.

However, there needs to be some discussion regarding the length of time that whānau with children might stay in CEH, in relation to the opportunity to play in outdoor environments.

Up until the age of around 6 months, a child is cared for and the need for time in the outdoors is limited to being outdoors with their carer. Hence, if the CEH units available are those without suitable outdoor space, this could be accepted. Whilst motel spaces are small and designed for whānau groups with families to stay 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 only one child up to 6 months of age.

Once children reach an age where they are mobile, i.e. toddlers, and they mature through the different ages discussed in Section 1.2.6, the space for play and opportunities in the wider outdoors becomes more important. The CEH for whānau with families should be selected on the basis of assessment of the units suitability for the needs of play, in relation to the age of the children, using the methodology set out in

Section 4 below. Should suitable opportunity not be available, any CEH unit provided should only be provided on a true short stay basis (no more than a week), whilst a more suitable safe unit is found.

3. The motel units for which resource consent applications have been received to operate as CEH

The physical layout of the seven motel complexes that have been used for CEH, and for which the retrospective resource consent applications have been made, varies.

We recognise that MHUD has gone through a selection process utilising the Rotorua 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.

Whilst this process has been worked through, we note that a system of assessing the suitability of the location/layout/availability of outdoor space for children of different ages relative to their play needs is useful as the resource consent applications are considered. In addition to this consent application process, this strategy could, in the future, assist the providers as they assess the suitability of units for whānau with children.

4. Rating the suitability of CEH for children and young people

We have discussed in the previous sections of this report the importance of play for children and young people, the types of activities that are important to different age groups and the spaces and opportunities that would be ideal for different aged children.

Based on this discussion, we have developed the following criteria to apply to our assessment of the suitability of each individual CEH facility in terms of play opportunities for different age groups:

Baby (new-born to 6 months):

- (a) The child is not mobile and thus for a short stay, 'play' within the unit is acceptable.

Toddlers (6 months to 3 years):

- (a) Facilities will be rated higher where:
 - (i) There is safe flow from the living unit to an outdoor area, which is securely fenced and has lawn and shade.
- (b) Facilities will be rated lower where:
 - (i) The outdoor space is not secure.
- (c) Additional considerations:
 - (i) If a safe outdoor area space is not available within a facility, access to a local neighbourhood park within 600m will lift the rating.

Junior children (3 to 7 years):

- (a) Facilities will be rated higher where:
 - (i) 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.
- (b) Facilities will be rated lower where:
 - (i) The outdoor space is not secure.

(c) Additional considerations:

- (i) 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.

Older children (8 to 12 years):

(a) Facilities will be rated higher where:

- (i) There is safe open space, noting this does not necessarily need to be as secure as for the younger age group. Children by this age are becoming more independent and have developed skills to assess risk. The importance of the outdoor space within the facility is for this group to be able to meet and socialise.

(b) Facilities will be rated lower where:

- (i) There is not a nearby park as at this age, space activities becomes much more important.

(c) Additional considerations:

- (i) Access to a local neighbourhood park 'within 600m distance away' via a safer local road route is important as freedom to access without a carer is possible.

Youth (from 13 to 18 years or older):

(a) Facilities will be rated higher where:

- (i) The facility has a park space for physical challenge on site or nearby, as testing physical ability, competing, and parading or just mucking around means space beyond the complex becomes of greater importance. If the space is within 600m, it will be more highly rated than if it is a kilometre or more away.

(b) Facilities will be rated lower where:

- (i) There is no outdoor space to socialise within the complex. This is less important if there exists a park with 600m, but still plays an important part of the facility's ability to respond to social play and interaction with youth.

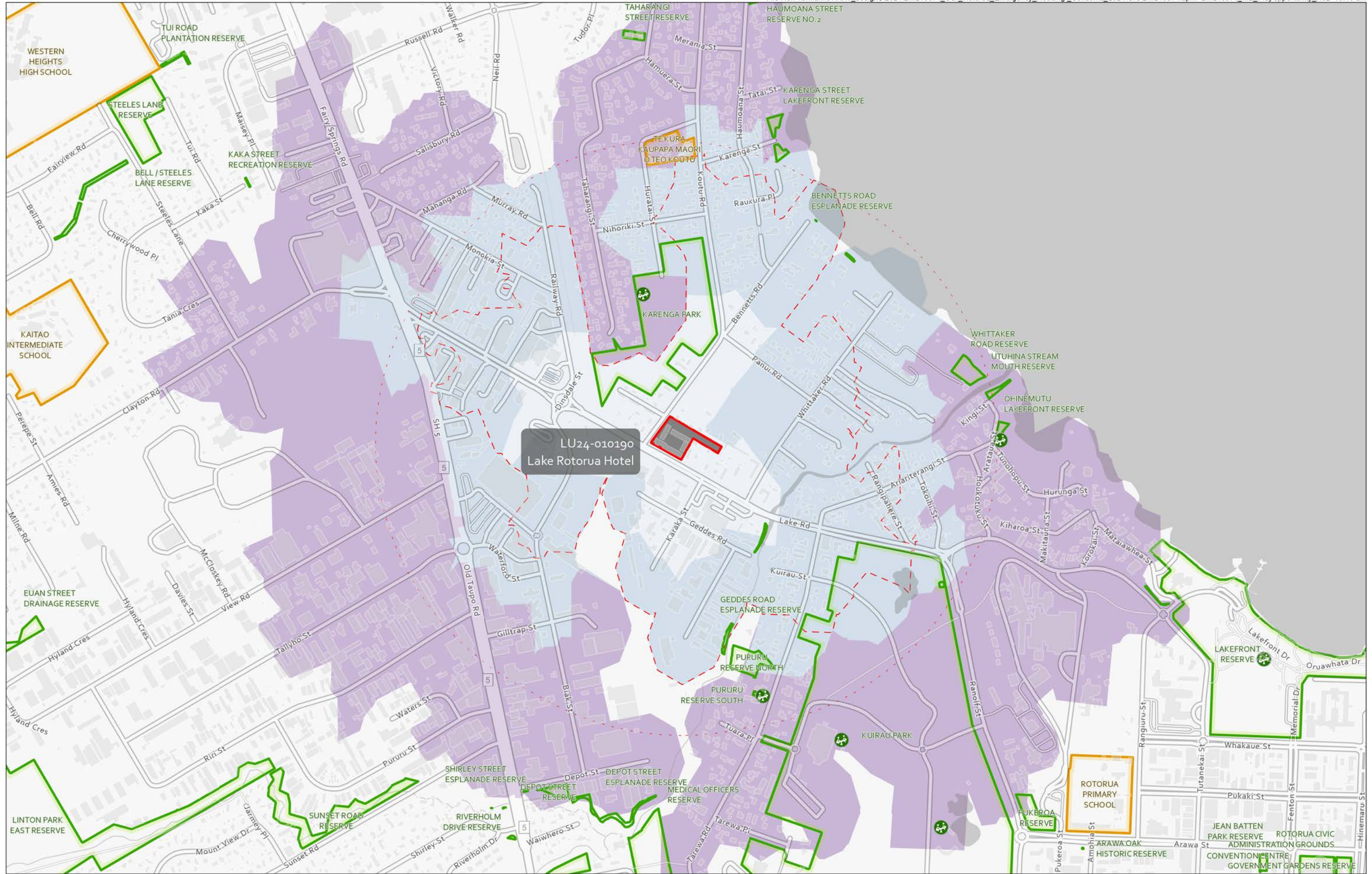
We present the motel locations together with the distance to local reserve spaces in the plans, together with a tabular format in **Annexure A**.

A table showing the rating of suitability individual sites is set out in a spreadsheet in **Annexure B**.

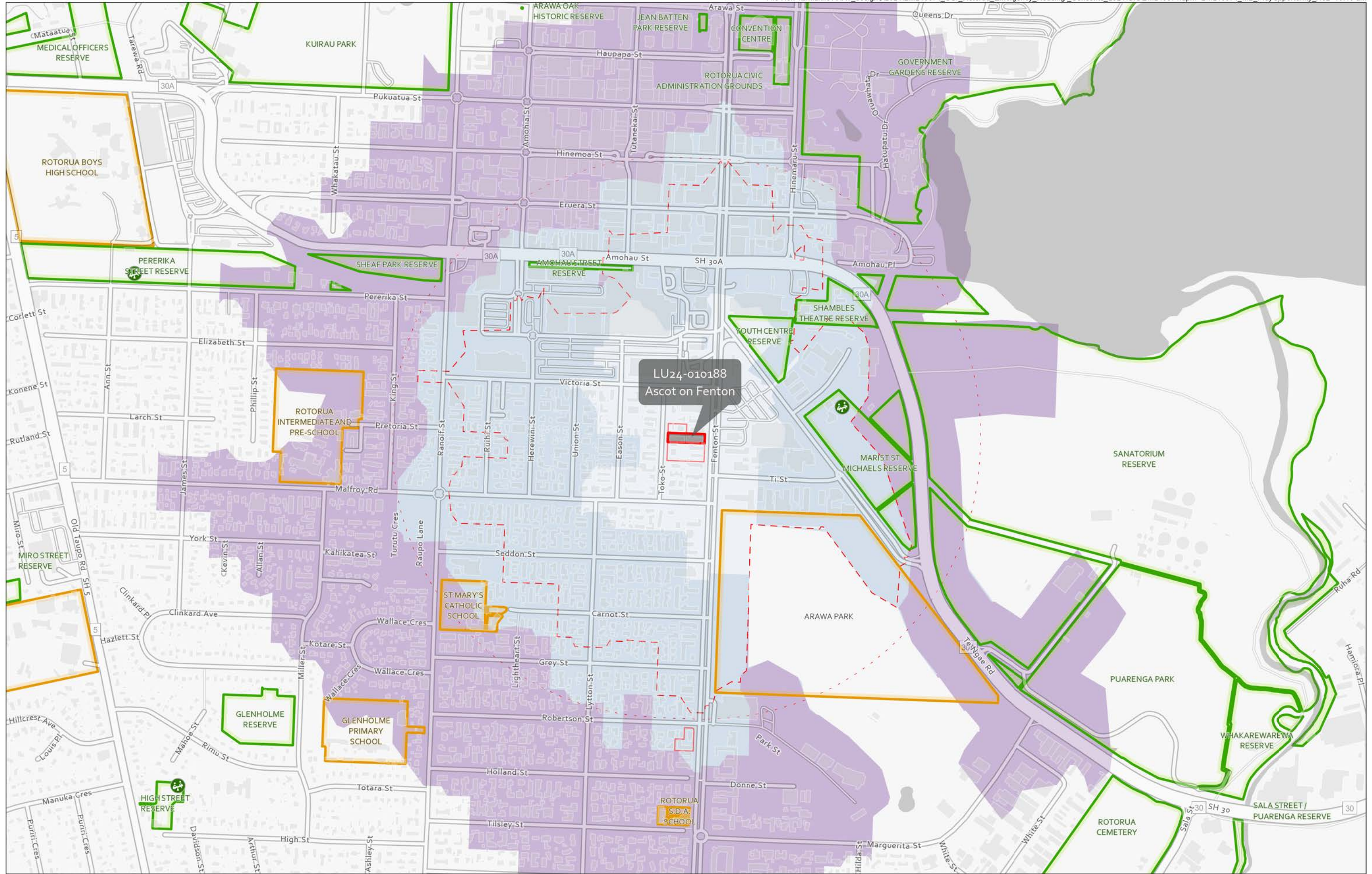
5. References

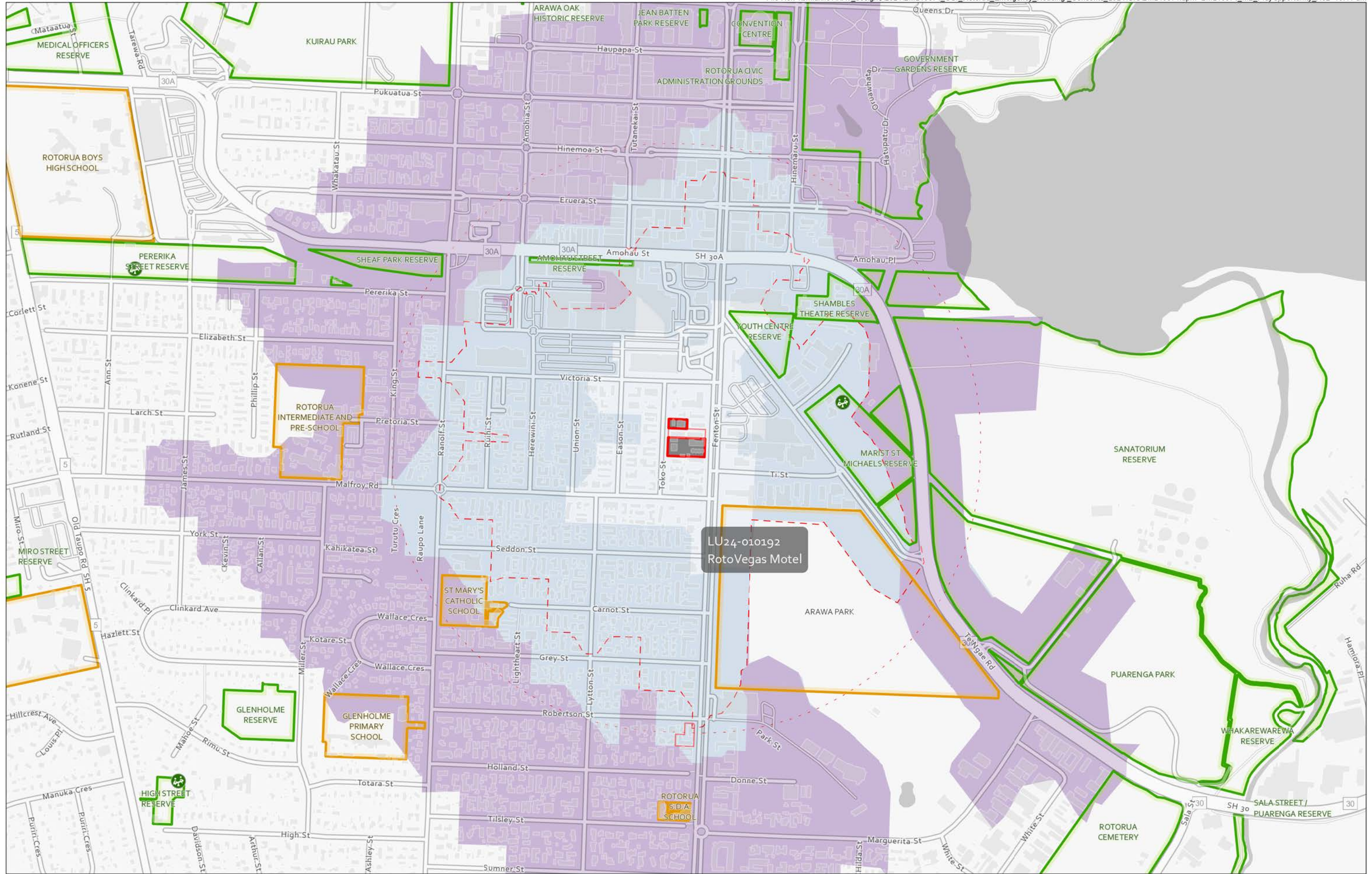
- Rotorua Parks and Reserves Network
- Rotorua Walkways, Rotorua Lakes
- Takaro, Investing in Play (Discussion Document) 2017 – Auckland Council
- United Nations Convention on the Rights of the Child <https://www.msd.govt.nz/about-msd-and-our-work/publications-resources/monitoring/uncroc/>
- Wellington Play Spaces Policy (2017) – Wellington City Council
- World_Parks_Statement_on_Play.pdf

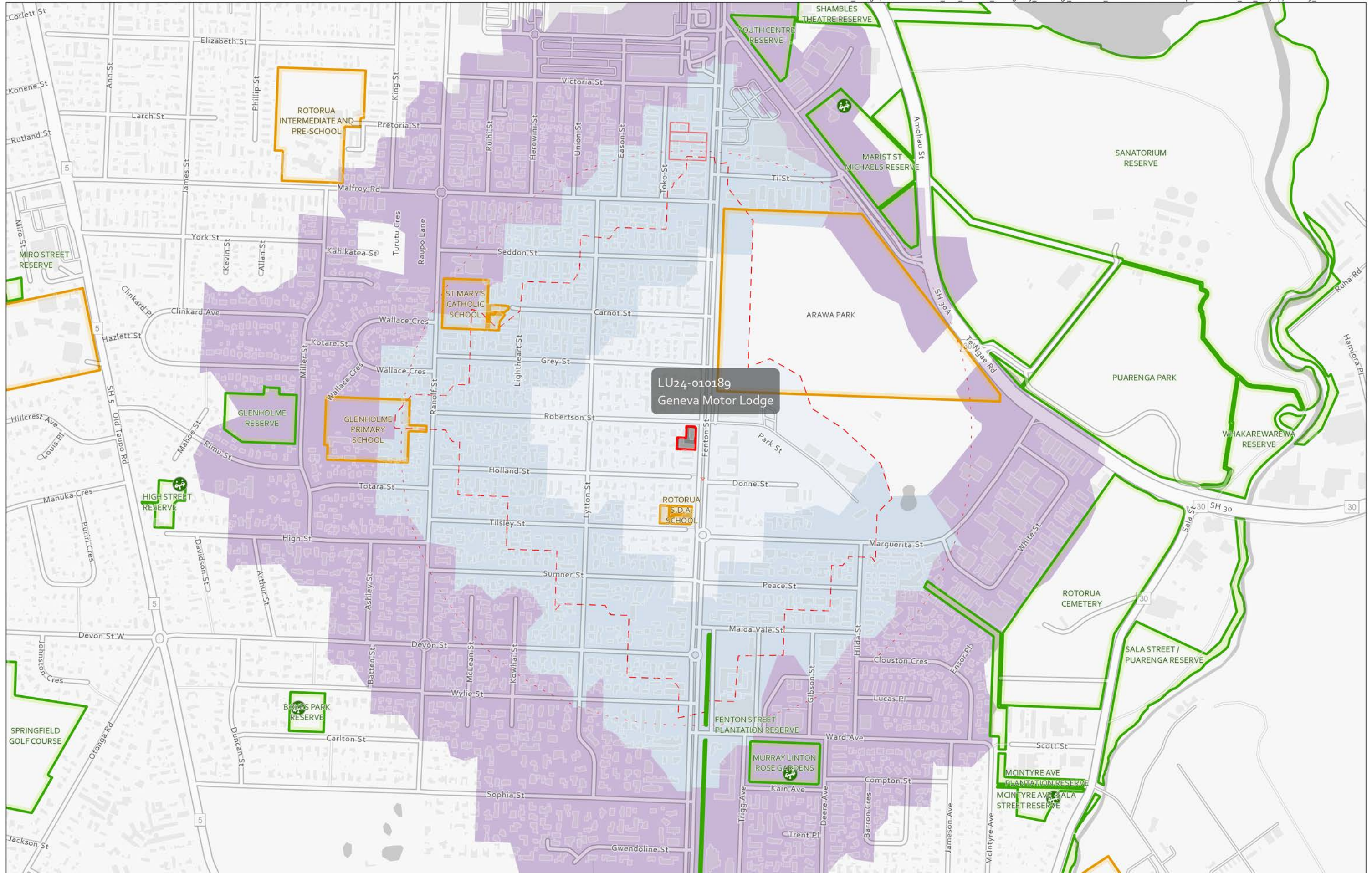
Annexure A – Motel locations and distance to local reserve spaces

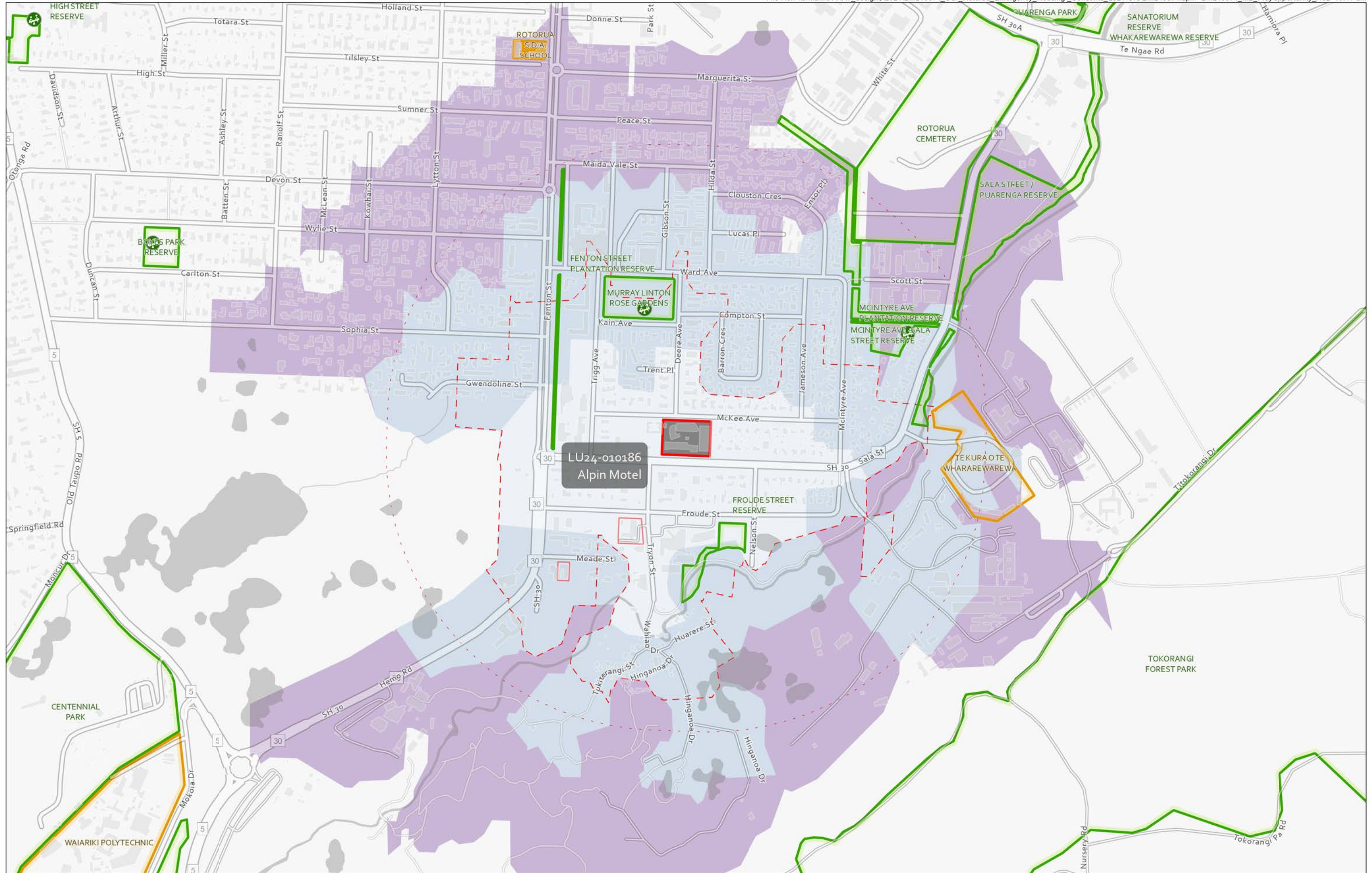


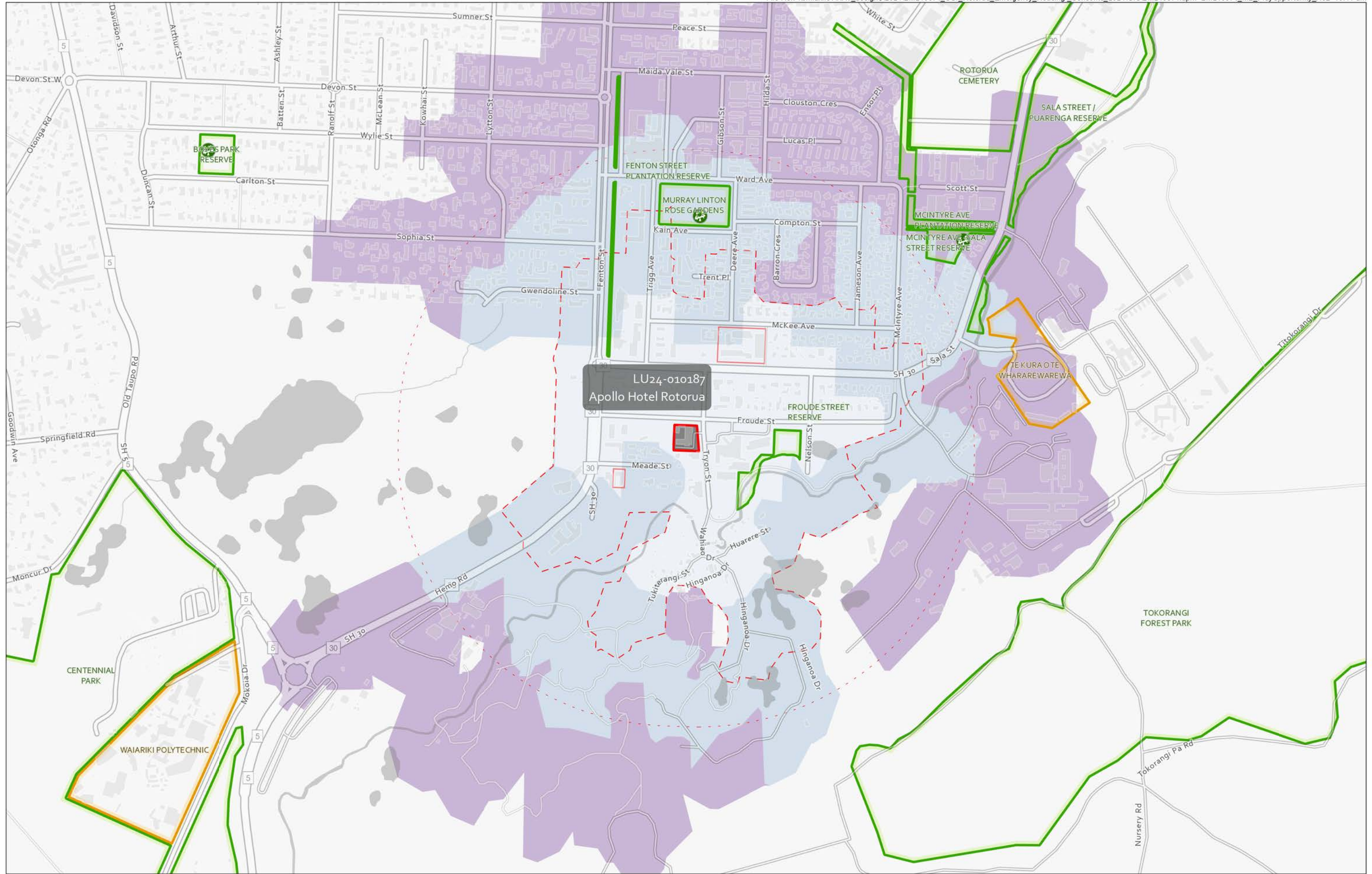
LU24-010190
Lake Rotorua Hotel

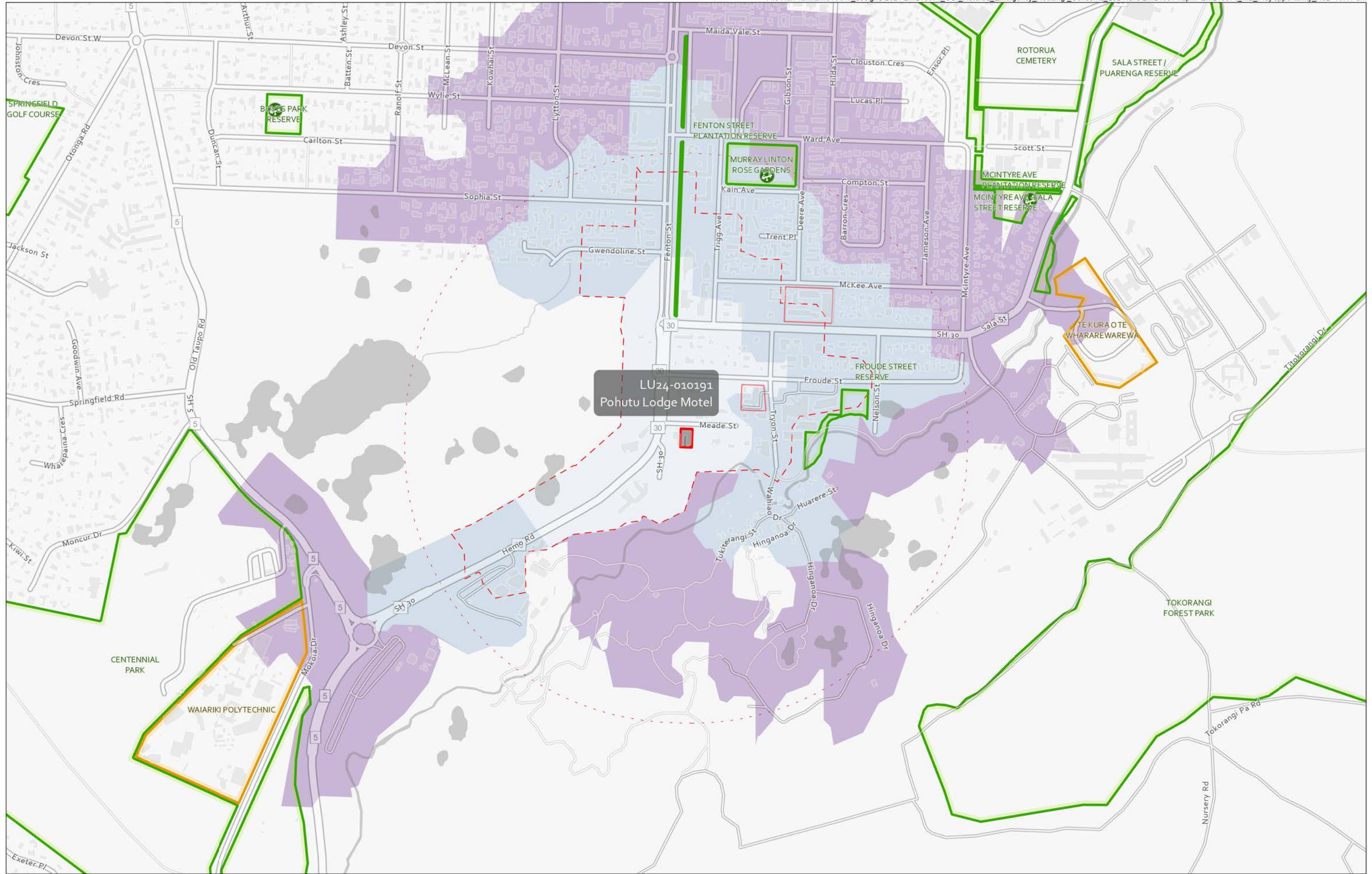












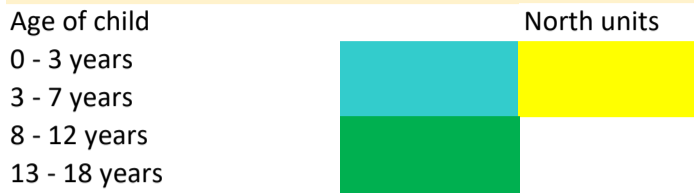
Annexure B – Overall rating of suitability for each individual site

Key

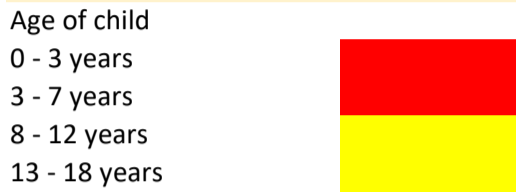
Level of acceptability



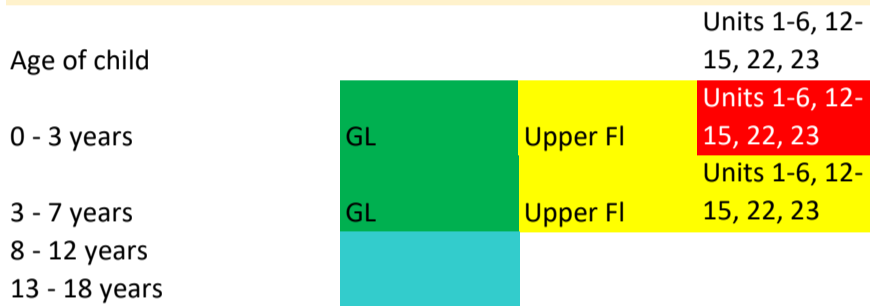
Lake Rotorua Hotel, 131 Lake Road LU24-010190



Ascot on Fenton - 247 Fenton Street and 12 Toko Street LU24-010188



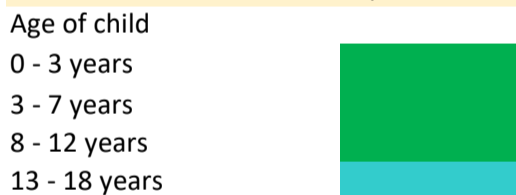
Roto Vegas - 249 Fenton Street and 16 Toko Street LU24-010192



Geneva Motor Lodge - 299 Fenton Street LU24-010189



Alpin Motel, 16 Sala Street LU24-010186



Apollo Hotel - 7 Tryon Street LU24-010187

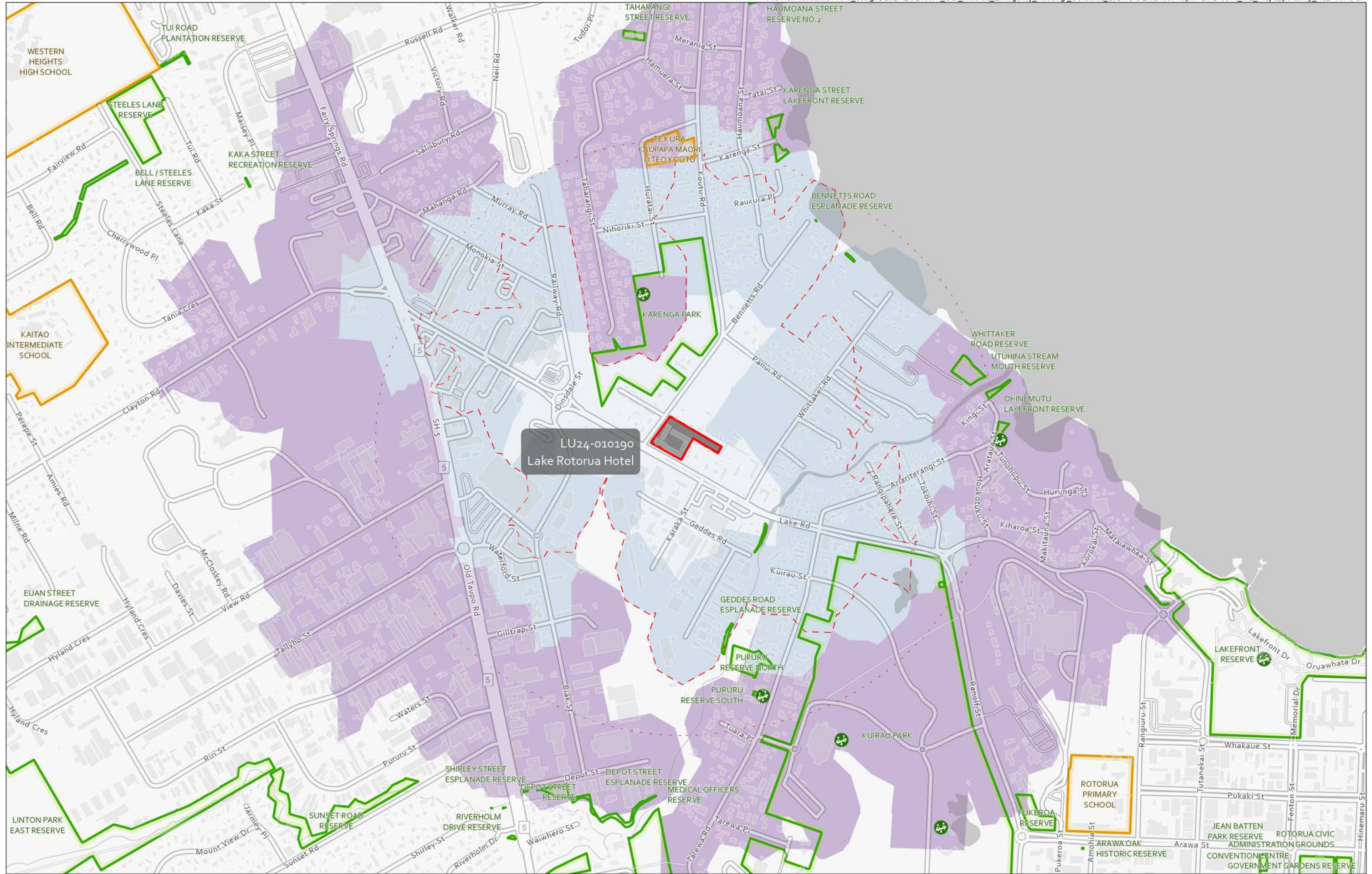


Last additional site

Situation 4 Pohutu, 3 Meade Street LU24-010191



Annexure B – Maps



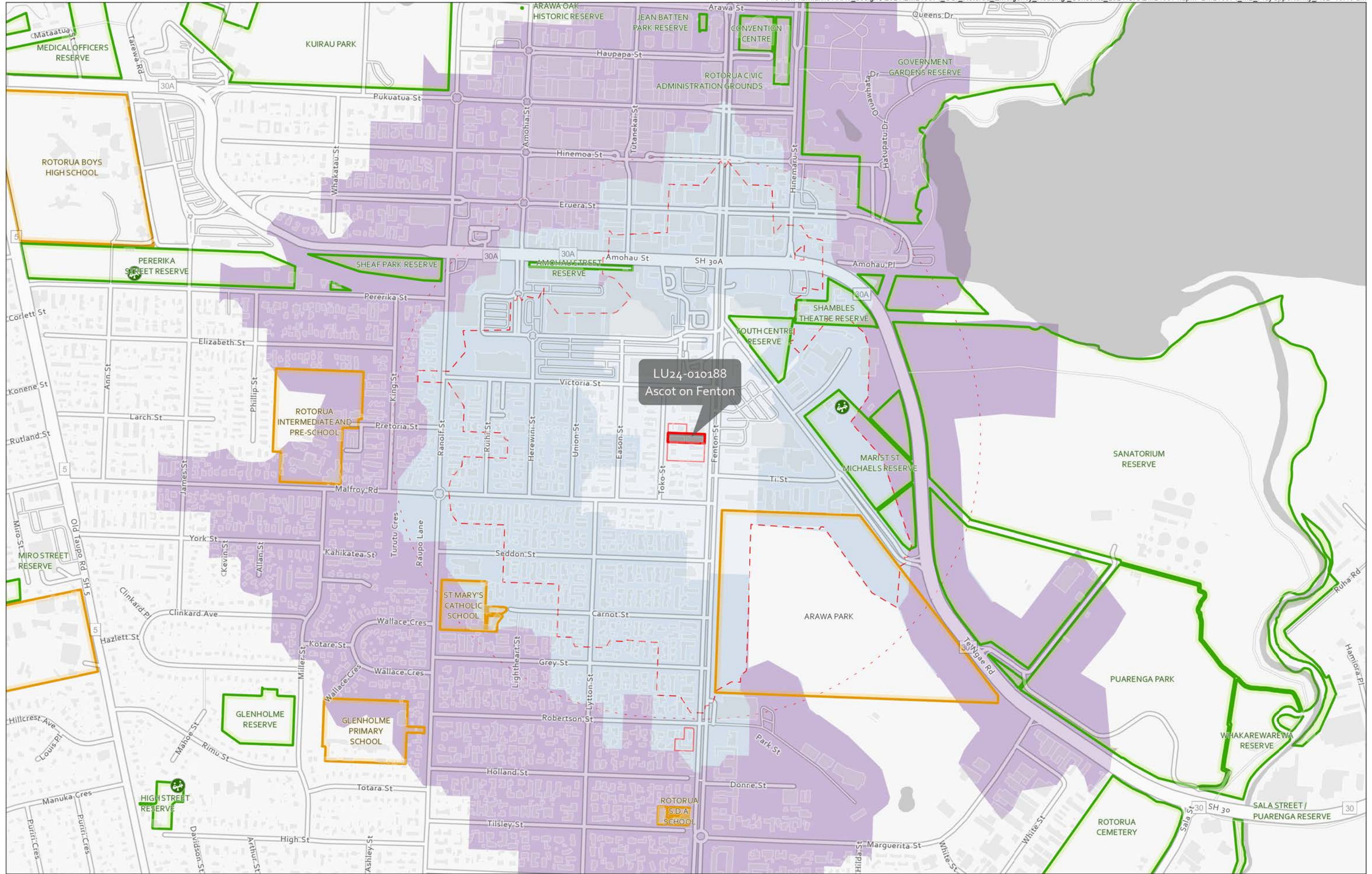
LU24-010190
Lake Rotorua Hotel

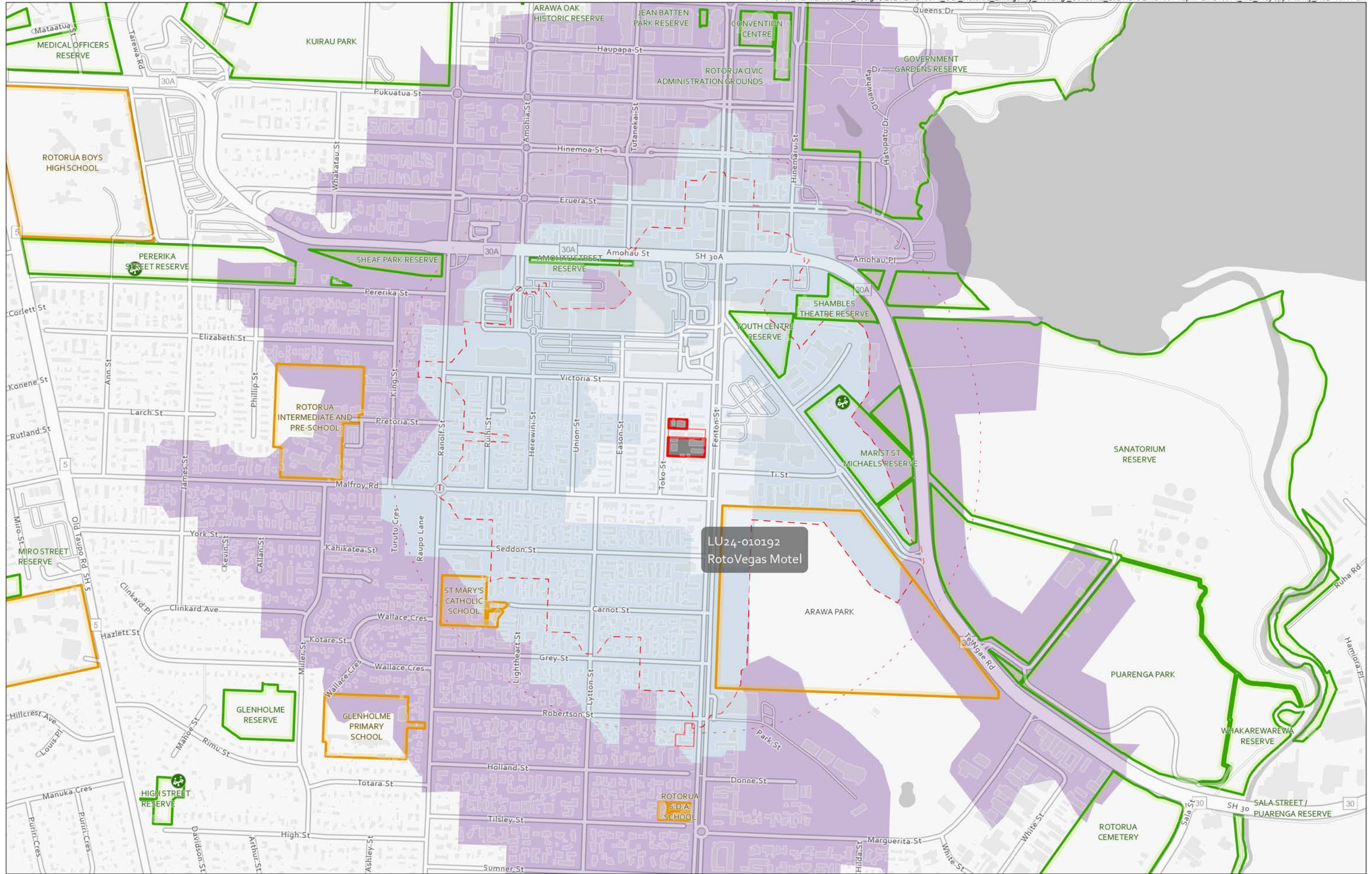
CONTRACTED EMERGENCY HOUSING RESOURCE CONSENT APPLICATIONS

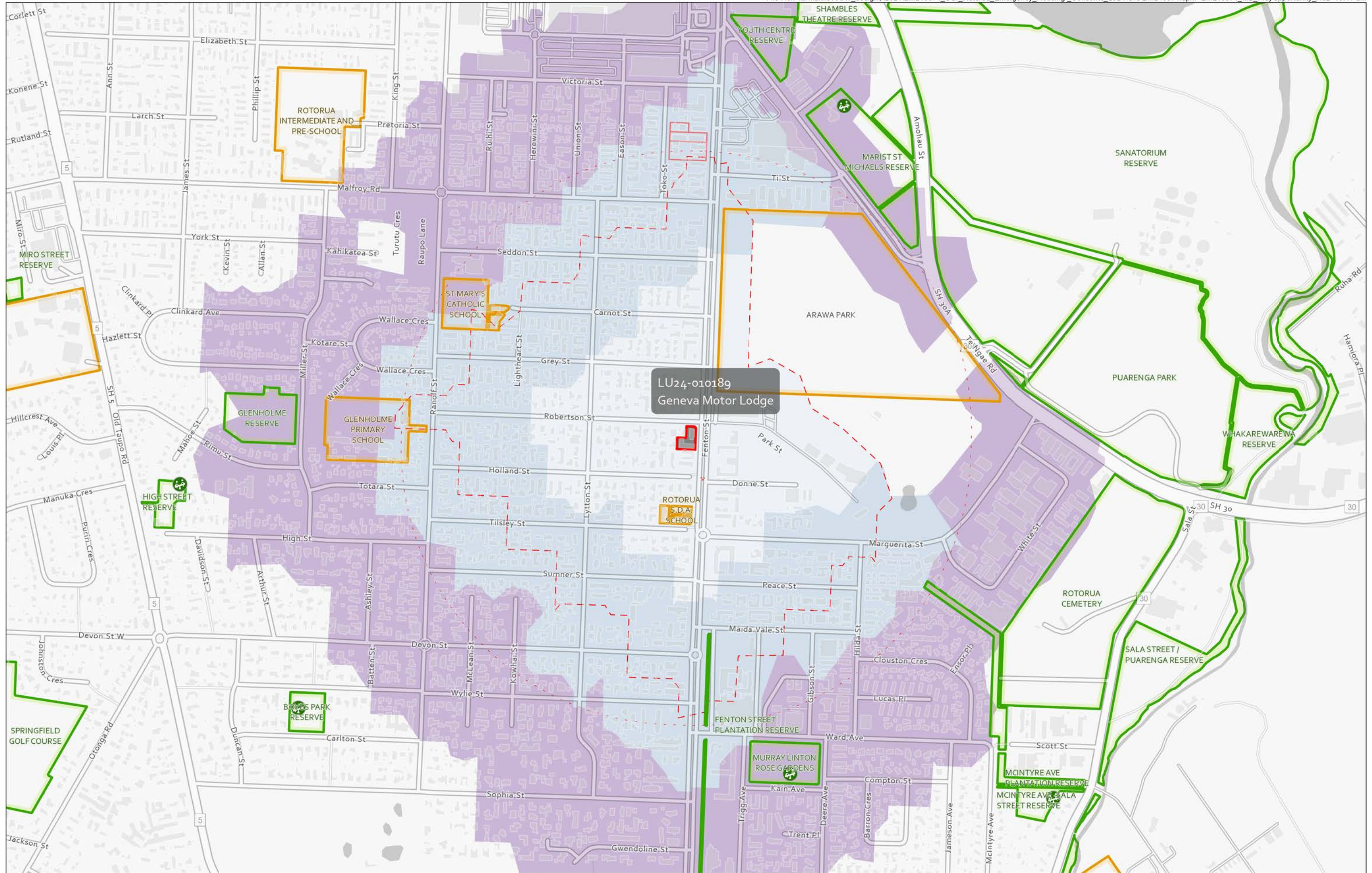
Play Opportunity - Lake Rotorua Hotel

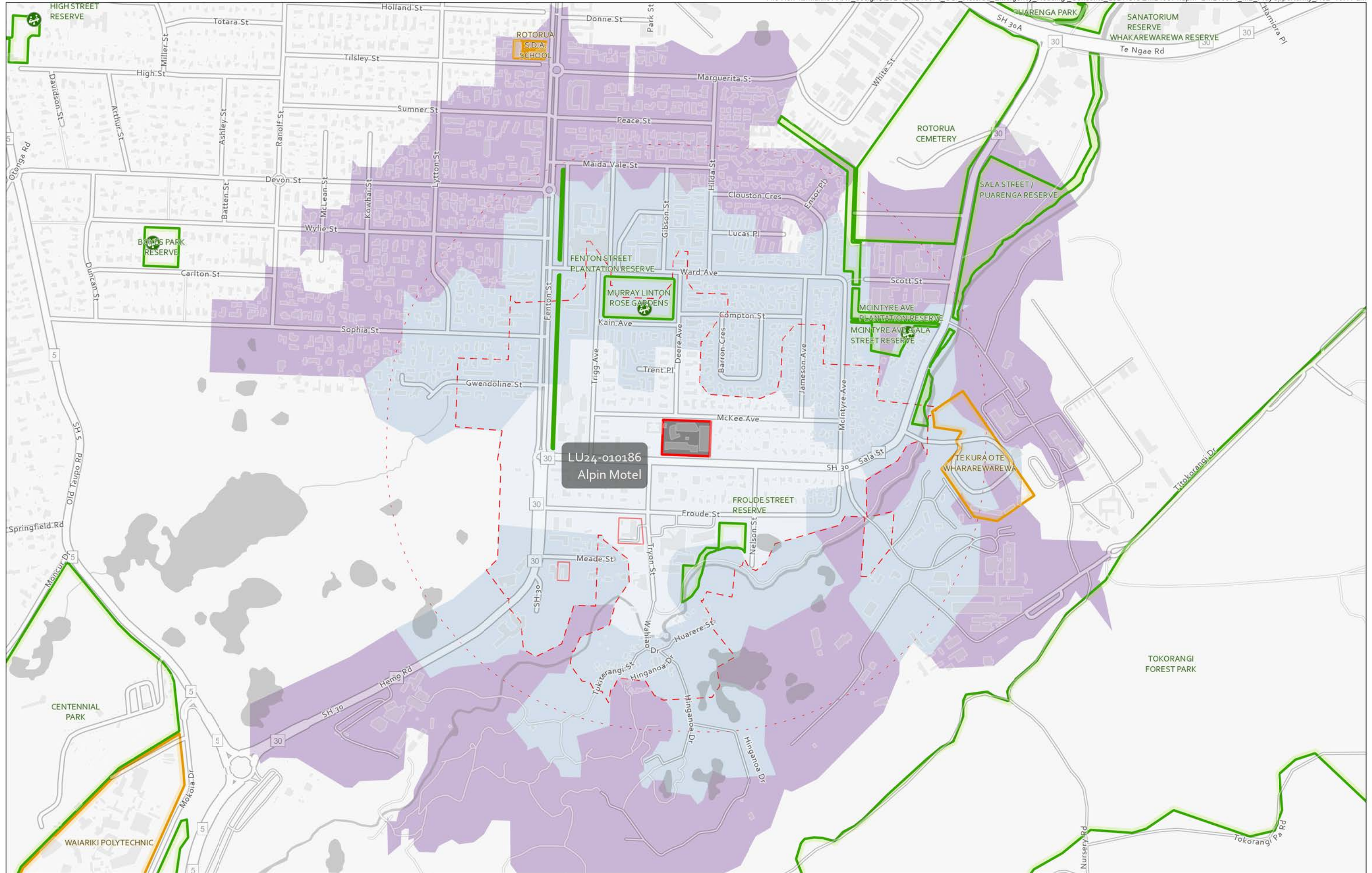
Date: 18 September 2024 | Revision: 3

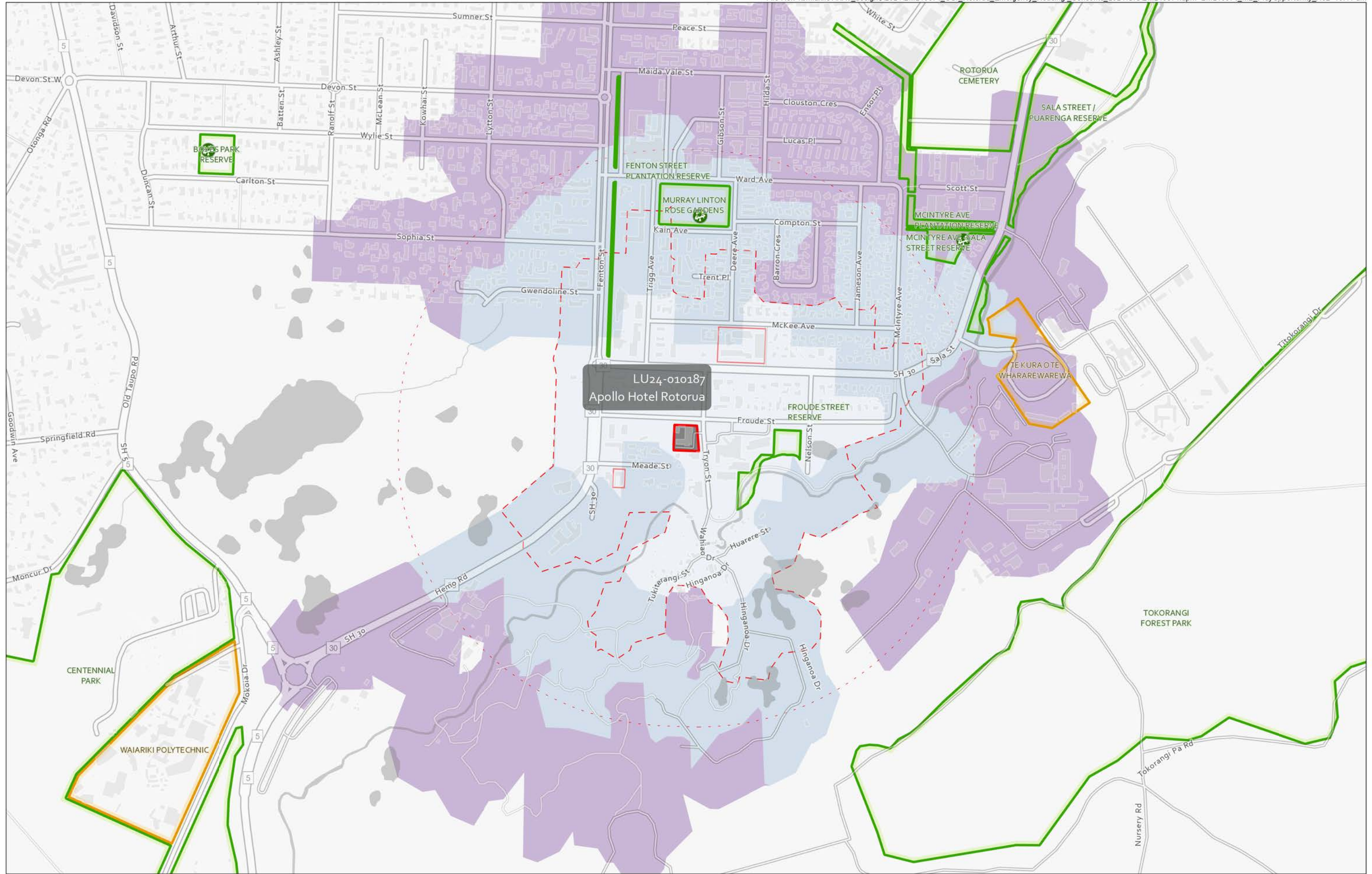
Plan prepared for Rotorua Lakes Council by Boffa Miskell Limited
Project Manager: Sean.Grace@boffamiskell.co.nz | Drawn: JWA | Checked: MPE

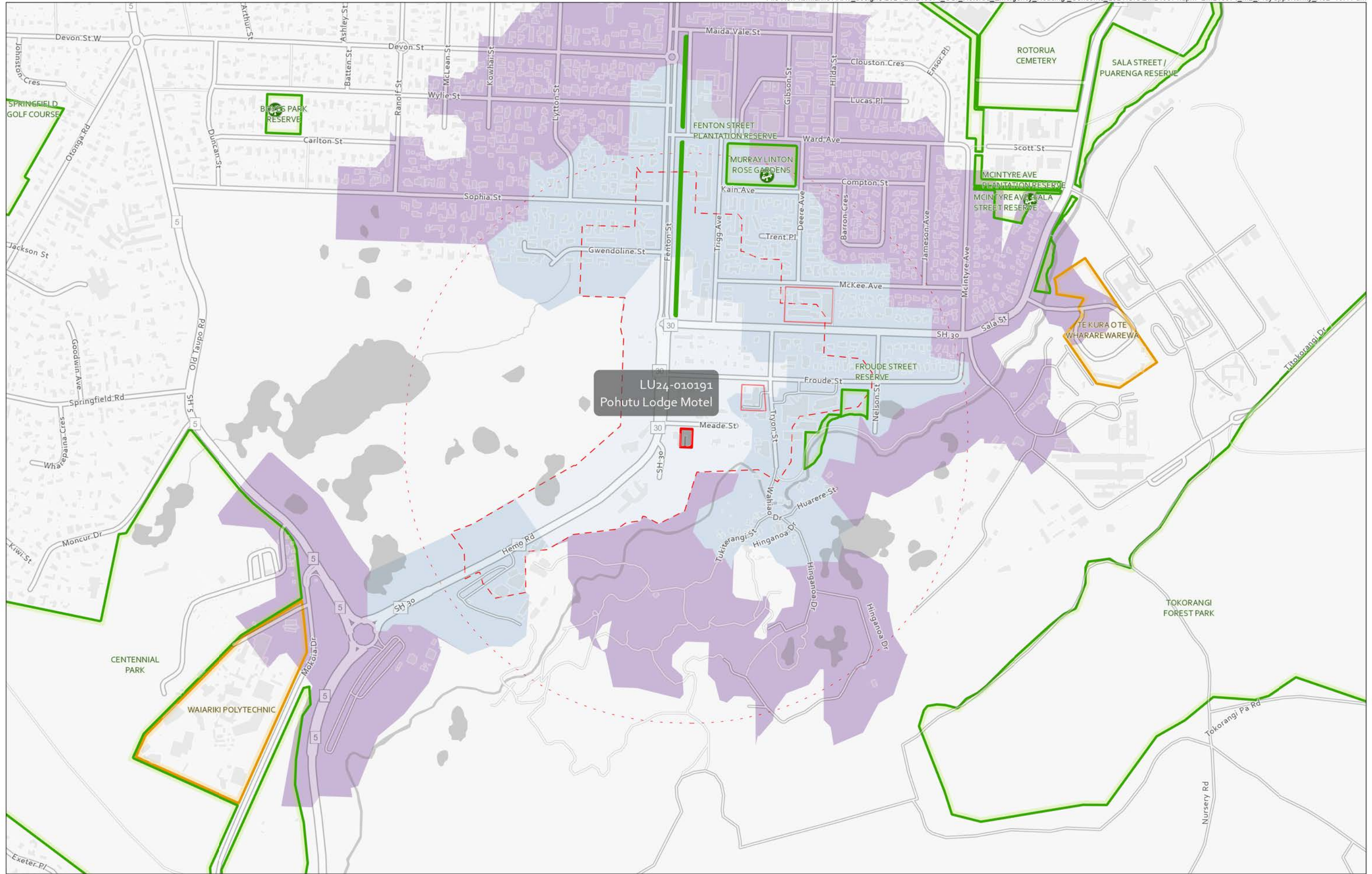












Annexure C - Summary of Findings

Key

Level of acceptability	high	moderate	low (bare minimum)	unacceptable
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Lake Rotorua Hotel, 131 Lake Road LU24-010190

Age of child	North units	
0 - 3 years		
3 - 7 years		
8 - 12 years		
13 - 18 years		

Ascot on Fenton - 247 Fenton Street and 12 Toko Street LU24-010188

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

Roto Vegas - 249 Fenton Street and 16 Toko Street LU24-010192

Age of child		Units 1-6, 12-15, 22, 23
0 - 3 years	GL	Upper Fl Units 1-6, 12-15, 22, 23
3 - 7 years	GL	Upper Fl Units 1-6, 12-15, 22, 23
8 - 12 years		
13 - 18 years		

Geneva Motor Lodge - 299 Fenton Street LU24-010189

Age of child	
0 - 3 years	GL Upper floor
3 - 7 years	GL Upper floor
8 - 12 years	
13 - 18 years	

Alpin Motel, 16 Sala Street LU24-010186

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

Apollo Hotel - 7 Tryon Street LU24-010187

Age of child	
0 - 3 years	Upper floor
3 - 7 years	Upper floor
8 - 12 years	
13 - 18 years	

Last additional site

Situation 4 Pohutu, 3 Meade Street LU24-010191

Age of child	2 storey	Studio units
0 - 3 years		
3 - 7 years		
8 - 12 years		
13 - 18 years		