

**IN THE MATTER**

of the Resource Management Act 1991

**AND**

**IN THE MATTER**

of the hearing for Plan Change 13 – Uplifting  
Deferred Zones of a submission by JL Hatwell &  
ML Johnston

---

**STATEMENT OF EVIDENCE OF TRACEY ANNE MORSE**

**16 June 2021**

---

**1 INTRODUCTION**

- 1.1 My full name is Tracey Anne Morse and I am a Senior Planner at CKL Planning | Surveying | Engineering | Environmental.
- 1.2 I have been employed in resource management and planning related positions in local government and the private sector for 11 years. During this time, I have provided technical and project leadership on a number of small and large development proposals. My work is largely focused on greenfield and brownfield land development and rural and urban subdivision and land use planning.
- 1.3 I hold a Bachelor of Science (Earth Science) and a Bachelor of Social Sciences (Resource & Environmental Planning) with Honours from the University of Waikato.
- 1.4 I am a Full Member of the New Zealand Planning Institute (MNZPI).
- 1.5 I have been engaged by the submitter, JL Hatwell & ML Johnston, to provide planning evidence in respect of Plan Change 13 which seeks to uplift deferred zones.
- 1.6 My previous experience in the Waipā District includes the following relevant projects:
  - 1.6.1 Tainui Group Holdings Ltd, land use consent to establish a new police station / hub at 2 Fort Street, Cambridge to replace the existing one (located elsewhere

within Cambridge), and associated Section 127 variation of consent conditions to increase the height of the approved telecommunications mast.

- 1.6.2 Jay El Ltd, pre-application coordination of specialists in preparation of lodgement of resource consent application to develop land within the T11 growth cell in Te Awamutu.
- 1.6.3 Gauntlett Family Trust, seeking subdivision consent to establish five new Large Lot Residential Zone-type lots over two stages within the T6 growth cell in Kihikihi.
- 1.7 I am familiar with the site and surrounding environment and have undertaken a site visit.
- 1.8 I have read the code of conduct for expert witnesses contained in the Environment Court's Practice Note 2014 and agree to comply with it. I have complied with it when preparing my written statement of evidence.

## **2 OUTLINE OF EVIDENCE**

- 2.1 My evidence considers planning matters with respect to Plan Change 13 and the T11 Growth Cell Structure Plan.
- 2.2 I have set out my planning evidence as follows:
  - 2.2.1 Amendment of the Rule 2.4.1.3(i) to accommodate establishment of early childcare educational services (Submission Point 23/1); and
  - 2.2.2 Amendment to Rule 2.4.2.54 to enable alternative visual permeability of building frontages for early childcare educational services (Submission Point 23/3).
- 2.3 I have reviewed the information available on Plan Change 13 including:
  - 2.3.1 Te Awamutu T6 and T11 Structure Plans, Boffa Miskell, 25 June 2020.
  - 2.3.2 Three water assessment, Te Awamutu T6 and T11 Structure Plans, Tonkin & Taylor Ltd (T&T), August 2019.
  - 2.3.3 The section 42A report prepared by Ms Hayley Thomas of Waipā District Council; and
  - 2.3.4 The section 32 Report prepared by Ms Thomas.
- 2.4 It is noted that this evidence is to be read in conjunction with evidence prepared by Mr Sean Hayes in relation to strategic development delivery matters.

## **3 AMENDMENT OF THE RULE 2.4.1.3(I) (SUBMISSION POINT 23/1)**

- 3.1 The Submitters, as part of progressing their development plans for their property at 926 Cambridge Road, which is located within the T11 growth cell, have found that there is demand for provision of a local early childcare education centre (ECE). This reflects that

it is anticipated that many future residents of this development would be young families. As such, there would be a demand for an ECE catering to the future residents of the growth cell.

- 3.2 The inclusion of ECE services within Rule 2.4.1.3(i), as sought by submission point 23/1, would ensure that this activity is considered as a Restricted Discretionary Activity.
- 3.3 This activity status would reflect the generally-anticipated nature of this activity as a key social infrastructure to support the future residents of the growth cell. It also affords Council the ability to consider the appropriateness of the specific details of any future ECE within the local centre based on key aspects that could affect the amenity of the adjacent residential activities, i.e. the matters of discretion outlined as part of the rule proposed within Plan Change 13.
- 3.4 A specific effect that is often contributes towards an ECE being inappropriate in a residential area is noise emissions as felt at the receiver, i.e. at adjacent dwellings. It is considered that the matter of discretion / assessment matter pertaining to “visual and amenity effects on surrounding properties” would provide Council with an ability to consider the potential noise emissions from an ECE. Therefore, if an application was made to establish an ECE of a scale or design that may result in inappropriate noise levels as heard at the receiving environment, Council would retain the ability to impose appropriate resource consent conditions to limit the noise levels to an appropriate level. Further, should Council consider that such a proposal could not achieve compliance with consent conditions of that nature, Council would retain the ability to decline such an application.
- 3.5 As such, I disagree with the recommendation made by Ms Thomas within the Section 42A Report to decline this submission point. The default activity status for any proposal seeking to establish an ECE in this Growth Cell, as outlined by Ms Thomas, would be a Discretionary Activity. This activity status provides a moderate degree of risk to any applicant and indicates a neutral position with regards to appropriateness of activity.
- 3.6 There are numerous examples of ECE’s operating within new or established residential areas that have been designed and are of a scale that there is an acceptable effect on the residential amenity of the locality. I consider that establishment of an ECE, of an appropriate scale and design, within the T11 Growth Cell would positively contribute to the well-being of the future community.

#### **4 AMENDMENT OF RULE 2.4.2.54 (SUBMISSION POINT 23/3)**

- 4.1 Submission point 23/3 seeks to have any ECE established within the T11 Growth Cell (as subject to submission point 23/1) excluded from the requirement to provide a 70% visual permeability to any building frontage at ground floor level. This is associated with the general need to provide privacy for small children from the public.
- 4.2 Passive surveillance, which is a key Community Protection Through Environmental Design (CPTED) principal, is the likely outcome sought through the requirement for a high degree of visual permeability in ground floor level building frontages under this rule. Due to the nature of ECE, there is little value in providing passive surveillance from these.
- 4.3 It is noted that the traffic (pedestrian and vehicular) associated with parents dropping off / collecting children from ECE can provide an alternative source of passive surveillance

for public areas adjacent to an ECE. This would assist with achieving the outcome sought by this rule.

## **5 RECOMMENDATIONS**

- 5.1 I recommend that submission points 23/1 and 23/3 be accepted and that the sought changes to the rules of the Residential Zone be incorporated into the ODP to encourage the provision of ECE within the T11 Growth Cell.

## **6 CONCLUSIONS**

- 6.1 The rules proposed to be included within the ODP for the T11 Structure Plan currently do not encourage the establishment of an ECE, through such activities requiring resource consent as a Discretionary Activity.
- 6.2 I consider that the provision of an ECE within the T11 Growth Cell area would be desirable to cater to the anticipated future residents of this growth cell, being predominantly young families.
- 6.3 The amendments sought to Plan Change 13 would provide for ECE as a Restricted Discretionary Activity, which provides a relatively low consenting risk to applicants while also affording Council the ability to impose consent conditions or decline ECE that could result in inappropriate effects on nearby future residents.
- 6.4 An additional amendment to Plan Change 13 is sought through submission point 23/3 to achieve suitable privacy for ECE while still achieving appropriate CPTED outcomes.
- 6.5 I recommend that amendments to Plan Change 13 be accepted as requested.

Date: 11 June 2021



---

**TRACEY ANNE MORSE**