

SUPPLEMENTARY EXPERT STATEMENT

IN THE MATTER OF: RESOURCE CONSENT SP/0179/20

3MS of Cambridge Limited Partnership

1863, 1865, 1871 and 1881 Cambridge Road

STATEMENT OF: Anna McElrea, Senior Reserves Planner

DATE: 19 May 2021

- 1 This report sets out a supplementary expert statement on the above application.
- 2 I have read the Applicant Matthew Smith's statement and the following Applicant's expert statements:
 - Mark Chrisp (Planning)
 - Stuart Mackie (Urban design)
- 3 I have outlined below the matters of difference in opinion to the applicant and note that my evidence in chief (in the form of a technical report attached to the section 42A report) remains unchanged.

MATTERS OF DIFFERENCE IN OPINION

- 4 The following sets out the matters where my expert opinion differs to that of the applicant or submitter expert.

EXPERT STATEMENT 1: MARK CHRISP

MR CHRISP CONCLUDES THAT:

- 4.1 Not providing sports fields in the application doesn't result in a significant departure to the structure plan with potential for effects on the wider Cambridge community (paragraph 147), and
- 4.2 That Waipā District Council's legal advice that informed the notification decision can be applied to reinforce that the levels of service for council reserves beyond the application site are not RMA effects arising from this application, that is, the absence of sports fields shouldn't form part of the assessment of the application (paragraph 149).

I DISAGREE FOR THE FOLLOWING REASONS:

- 4.3 The development of the subject site and the wider C2 growth cell surrounding it generates a demand for sports field playing hours that if not met through the provision of this sports fields within the C2 growth cell, will have an impact on:
 - 4.3.1 Cambridge residents adjoining existing sports fields proposed to be upgraded as an alternative as a result of the significant increase in activation and associated impacts such as noise, light, traffic generation and parking pressures on training and game days,
 - 4.3.2 participants and clubs who will likely face at least in the short to medium term, challenges associated with a growing sports field capacity shortage, and
 - 4.3.3 the residents of C1, C2, C3 and C7 who will have to travel further to access their recreation activities, not have in close proximity a large open public space to hold community events and gatherings and not experience the way of life envisaged in the structure plan.
- 4.4 Clause 7 of schedule 4 of the Resource Management Act 1991 sets out that any effect on those in the neighbourhood and, where relevant, the wider community, including

any social, economic, or cultural effects the following matters must be considered an effect.

- 4.5 Ms Atkins has covered off the issue of the legal opinion in her legal submissions.

EXPERT STATEMENT 2: STUART MACKIE, URBAN DESIGN

MR MACKIE CONCLUDES THAT:

- 4.6 The reduced active recreation space in the middle of the scheme is offset by the increase in local open space, that is, stormwater reserves, in the vicinity and that overall the extent of green space in the scheme is similar to that shown in the Structure Plan (paragraph 28).

I DISAGREE FOR THE FOLLOWING REASONS:

- 4.7 While the proposed stormwater reserves will form part of an integrated open space network contributing to ecological, amenity and recreation values they cannot be equated to the reduction of almost 3ha of recreation reserve land that in addition to the above functions would have catered for active recreation, large community gatherings and events and parking provision to cater for the visitation created by the sports fields and the applicant's desired destination playground.

APPLICANT MATTHEW SMITH'S STATEMENT:

MR SMITH CONCLUDES THAT:

- 4.8 The lack of sports fields has no wider community effects (paragraph 40);
- 4.9 Sports fields provide opportunities for the privileged few that can afford to play sports (paragraph 40);

- 4.10 Many of the main sports numbers are declining questioning the need for more sports fields (paragraph 40); and
- 4.11 Repurposing the existing sports fields could prove to be a smarter way of achieving more than the proposed \$15m plus investment intended (paragraph 40).

I DISAGREE FOR THE FOLLOWING REASONS:

- 4.12 As set out above I believe there are environmental impacts on the wider community that must be considered as part of the assessment of the application.
- 4.13 In addition to the Structure Plan's specification that the development will create a generous and connected network of high quality accessible parks and open spaces that provide social gatherings, recreation and leisure within a short walking distance of the majority of residents, that in Section 15 – Infrastructure, Hazards, Development and Subdivision of the Waipā District Plan, the continuing need to provide suitable reserve land to serve the active and passive recreational needs of the community is identified (15.2.16) and that policy 15.3.3.1 specifies that all proposed subdivision shall be serviced with reserves for community, active and passive recreation to a level that will provide for the anticipated activities approved in a structure plan. As noted in my evidence in chief, there is strong rationale for requiring sports fields within C2 and while other opportunities to secure land for sports fields may exist within C2, these have not yet been explored by Council and the impact of not having the Structure Plan identify these sites for this purpose on negotiations is unknown but is deemed to be a risk in achieving a successful willing seller/willing buyer outcome.
- 4.14 Sports fields provide opportunities for the whole community to be physically active. The importance of providing these opportunities to the wellbeing of future residents is clearly articulated in both Sport NZ's Strategic Plan 2020 -2024 and Sport NZ's Value of Sport Report and is the reason we want to ensure future residents of C1-C3 and C7 have access to a facility that provides these opportunities. While acknowledged in the Sport New Zealand's Active NZ survey 2019 Participation Report that there are inequities associated with deprivation, clubs proactively work to ensure cost is not a barrier to participation. This, together with ensuring the community can easily travel

to facilities through strategic location choices, multi modal travel options and sufficient parking provision are two critical ways to address this inequity. The proposed model for the sports fields in C2 was to have a Council-managed facility bookable by any group to make the facility more easily accessible for codes and entities not domiciled at other reserves within Cambridge; this was another way Council was attempting to make opportunities to be physically active more accessible. In addition, the fields were to be able to be used outside of these times informally by any members of the community. The proposed densities and relatively small yard sizes in the proposed development and likely the wider growth cell development make the provision of sports fields that enable active recreation particularly important.

- 4.15 The recently completed Central Waikato Sub-Region Sports Field Supply and Demand Study does not support the assertion that the main sport numbers will decline in Cambridge, rather it confirms there will be a growth in player numbers for rugby, football and lacrosse that will further exacerbate the current sports field capacity shortfall.
- 4.16 It is considered that the cost to develop the sports fields is overestimated by at least \$2m.
- 4.17 Council assessed the alternative of 'repurposing' existing sports fields beyond what is already planned in the Long Term Plan 2021 – 2031 to cater for existing demand but deemed it to be a less optimal solution for the reasons outlined in my assessment. These include, but are not limited to, future proofing capacity for Cambridge's future intensification, enabling areas of the Cambridge Town Belt to be protected and developed for their ecological and amenity values, the challenges associated with reverse sensitivities on existing residential developments, and reserve management plan reviews to enable such developments and the Council's current lease model for these sports fields.

AMENDMENTS TO MY EVIDENCE IN CHIEF

- 5 Having read the relevant evidence as listed above, I don't wish to make any amendments to my evidence in chief.

OVERALL RECOMMENDATION

- 6 Having read the relevant evidence, my overall recommendations remain the same.

Signed

A handwritten signature in blue ink, appearing to read 'A M'Elrea'.

Anna M'Elrea

SENIOR RESERVES PLANNER