

**BEFORE THE WAIKATO DISTRICT COUNCIL**

**IN THE MATTER** of the Resource Management Act 1991

**AND**

**IN THE MATTER** of the submission points made by Ara Poutama Aotearoa (the Department of Corrections) on the Business Zone and Business Town Centre Zone provisions of the Proposed Waikato District Plan (Submitter No. 496 and Further Submitter No. 1210) – **Hearing 9**

---

**STATEMENT OF EVIDENCE “HIGHLIGHTS PACKAGE” OF MATTHEW  
CRAIG ALLOTT**

**PLANNER**

**ON BEHALF OF ARA POUTAMA AOTEAROA (THE DEPARTMENT OF  
CORRECTIONS)**

13 January 2020

---

- 1.1 The submission points made by the Department seek permitted activity status for “community corrections activities” in the Business and Business Town Centre Zones (points numbered 496.6 and 496.7).
- 1.2 Community corrections sites include service centres and community work facilities, and are essential social infrastructure. Non-custodial services and their associated infrastructure play a valuable role in reducing reoffending. Community work helps offenders learn vital skills and give back to their community, and in return the community benefits from improved facilities. The Department considers that its services enable people and communities to provide for their social and cultural well-being and for their health and safety, and therefore those activities and services contribute to the sustainable management purpose of the RMA.
- 1.3 Community corrections sites support offenders living in that community. The Department therefore looks to locate its sites in areas accessible to offenders, and near other supporting government agencies. Commonly, sites are therefore located in commercial or business areas.
- 1.4 In the Waikato District, the Department currently operates three non-custodial community corrections sites:
- *Huntly Service Centre*, 2 Glasgow Street, Huntly
  - *Ngaruawahia Reporting Centre*, within the Ngaruawahia Community House, 13 Galileo Street, Ngaruawahia
  - *Raglan Reporting Centre*, within the Raglan Community House, 45 Bow Street, Raglan
- 1.5 All three sites are located within the proposed Business Zone in the PWDP. Community corrections facilities are appropriately suited to such business areas on the basis that they are easily accessible to the communities they serve.
- 1.6 The Section 42A Report for Hearing 5: Chapter 13 Definitions<sup>1</sup> recommended accepting the relief sought by the Department, which involves the inclusion of a definition for “community corrections activity”, consistent with that from the National Planning Standards, within the definitions Chapter 13, as follows:

---

<sup>1</sup> Report prepared by Anita Copplestone and Megan Yardley, dated 5 November 2019

**Community Corrections Activity**

means the use of land and buildings for non-custodial services for safety, welfare and community purposes, including probation, rehabilitation and reintegration services, assessments, reporting, workshops and programmes, administration, and a meeting point for community works groups.

- 1.7 The Department tabled a letter dated 19 November 2019 on behalf of the Department, in lieu of attending Hearing 5, supporting the Section 42A report’s recommendation with regards to the “community corrections activity” definition. This letter identified that an explicit reference to “community corrections activities” within the Business and Business Town Centre Zone chapters would be necessary to achieve the relief sought by the Department.
- 1.8 The key point made in the 19 November 2019 letter is that specific references to community corrections activities are necessary in the Business and Business Town Centre Zone rules.
- 1.9 The Department’s primary submission points requested permitted activity status for community corrections activities within the Business and Business Town Centre Zones.
- 1.10 The primary submission points assumed that community corrections activities would be sub-categorised under the community activity definition. As such, the retention of the permitted status for community activities in the Business and Business Town Centre Zones was sought to be retained as per the notified provisions, as follows:

• **Business Zone, Permitted Activities (Rule 17.1.2):**

<b>Activity</b>		<b>Activity-specific conditions</b>
...	...	...
P3	Community activity	Excluding a cemetery

• **Business Town Centre Zone, Permitted Activities (Rule 18.1.2):**

<b>Activity</b>		<b>Activity-specific conditions</b>
...	...	...
P6	Community activity	Excluding a cemetery

1.11 The Section 42A report for Hearing 9 supports the permitted status of community corrections activities in the two subject zones, outlining the following:<sup>2</sup>

*“... Locating community corrections facilities in Business Zones mean that they have good accessibility to other social government agencies, such as the courts, Police and Work and Income. It would provide for community corrections activities therefore it is supported.”*

1.12 Notwithstanding these recommendations made in the Section 42A report, and as outlined in my earlier commentary around how community corrections activities are no longer sub-categorised under the definition of community activities following the recommended outcomes for Hearing 5 (Definitions), it is now necessary to provide specific references to community corrections activities as permitted in the two subject zones.

1.13 This would be achieved by the insertion of a new permitted activity rule under the Business and Business Town Centre Zones, to provide an explicit reference to community corrections activities in the zones as permitted activities, as follows (insert under Business Zone Rule 17.1.2 *and* Business Town Centre Zone Rule 18.1.2):

<b>Activity</b>		<b>Activity-specific conditions</b>
...	...	...
<u>P[X]</u>	<u>Community corrections activity</u>	<u>Nil</u>

1.14 The amendments sought are minor, but will result in avoiding any interpretation issues arising around community corrections activities in the subject zones in the future.

<sup>2</sup> Hearing 9 Section 42A Report, Appendix 1: H9 – Business Zones -Table of submission and further submission points, pages 15-16