



FAST TRACK APPROVALS Act 2024 (FTAA 2024) TECHNICAL ADVICE

Carter Group Ōhoka Substantive Application

File No	FTAA-2606-1253
Date	7 October 2026
Memo To	Kate Barry-Piceno, Ōhoka Residential Subdivision Expert Panel Chair
From	Rachael Annan, Recreation Planner, Waimakariri District Council
Subject	Recreation and Reserves: WDC review comments

1. INTRODUCTION

Purpose of the Memorandum

1.1 The purpose of this memorandum is to provide technical review and advice on the recreation and reserve provisions of the Carter Group Ōhoka Substantive Application. This review considers whether the proposed reserve network appropriately responds to the recreation demands generated by the development and achieves the recreation and open space outcomes anticipated by the relevant planning framework, including Council's Parks Categories and Levels of Service Framework (2011).

1.2 In undertaking this review, consideration is given to:

- The type, scale and distribution of proposed reserve provision;
- The function of reserve land within the proposed open space network;
- The relationship between population growth and reserve provision;
- Reserve hierarchy, accessibility and neighbourhood park outcomes;
- The role of existing reserve assets in meeting recreation demand, and;
- The implications of the proposal for Council's statutory reserve provision responsibilities under the Local Government Act 2002 and the Parks Levels of Service framework adopted to deliver associated community, recreation and open space outcomes;
- Aspects of the application's urban design and landscape assessments where they materially influence reserve structure, recreation outcomes and public open space provision.

1.3 The memorandum identifies areas of agreement and disagreement with the application material, highlights information gaps where relevant, and provides

an assessment of whether the proposed reserve network adequately addresses the recreation needs generated by the development.

Documents reviewed

- Relevant aspects of Application AEE (Novo Group, June 2026)
- Updated Application Landscape Assessment (DCM, September 2026)
- Updated Application Urban Design assessment (DCM, September 2026)
- Updated Application Masterplan (DCM, September 2026)
- Updated Application Scheme Plans (Inovo Group, September 2026)
- Draft Landscape Management Plan (DCM, September 2026)

Key areas discussed in this memorandum:

- Recreation demand arising from growth;
- Neighbourhood park shortfalls;
- Reserve hierarchy and park function;
- Linkages, esplanades and SMA provision;
- Reliance on Ōhoka Domain;
- Reserve calculations and vesting;
- Planting mitigation, and;
- Relevant information gaps of the application.

2. QUALIFICATIONS

2.1 I am a registered member of Tuia Pito Ora, the New Zealand Institute of Landscape Architects (NZILA), and a member of the institute's environmental legislation working group. I hold a Bachelor of Landscape Architecture (Honours) from Lincoln University. My professional experience spans more than 20 years across landscape architecture, landscape planning and urban design review.

2.2 Most of my experience has involved providing technical assessment or peer review for resource consent applications. I have worked on rural and urban projects for councils and applicants across New Zealand. My project work has also included providing technical analysis and advice to inform plan changes and district plan preparation. I have provided expert evidence at both council hearings and the Environment Court.

2.3 Since May 2026, I have been employed by Waimakariri District Council as a Recreation Planner. Relevant to this application, my role includes reviewing reserve provisions and connectivity outcomes for proposed subdivision development within the district.

3. CODE OF CONDUCT

3.1 I have read and am familiar with the Environment Court's Code of Conduct for Expert Witnesses (Environment Court Practice Note 2023) and I agree to comply with it when providing this evidence to the panel. My qualifications as an expert are set out above.

- 3.2 Other than where I state that I am relying on the advice of another person, I confirm that the matters addressed in this statement of evidence are within my area of expertise.
- 3.3 I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

4. KEY ISSUES

Recreation Planning Framework and Parks Levels of Service

Legislation

- 4.1 The Fast-track Act, NPS-UD, and District Plan establish development outcomes sought, including well-functioning urban environments, and appropriate open space and recreation opportunities. This legislation, however, does not specifically prescribe the reserve types, functions or level of provision required to achieve those outcomes.
- 4.2 In the absence of a District Plan agreed and resolved outline development plan, and guiding spatial planning rationale for this application, an assessment of recreation outcomes against policy matters looks to higher order and relevant district plan zoning objectives and policies.
- 4.3 The open space zone provisions of the district plan anticipate the effects of proposed activities and structures within council reserves. Effects assessment then focuses on the scale, layout, design and intended use of such development within open space and recreation land.
- 4.4 Council's Parks Categories and Levels of Service Framework (LoS Framework, 2011), approved by elected members, set out the reserve outcomes sought for communities, and the provisions to achieve them. It translates higher-order planning outcomes into a physical reserve network and provides Council's framework for responding to reserve and recreation demands arising from growth in support of its Local Government Act responsibilities.
- 4.5 Reserve provision forms part of the wider community infrastructure that supports residential growth. Accordingly, the adequacy of reserve provision is relevant to determining whether the development contributes to the broader community outcomes sought by the planning framework. Both sufficient spatial (area and form), and functional outcomes (i.e. reserve category and open space zoning) outcomes are required.
- 4.6 Council's LoS Framework identifies different reserve types which perform different functions and operate at different catchment scales. This establishes a reserve hierarchy that collectively delivers recreation, amenity and community outcomes across the district.
- 4.7 The LoS Framework draws on the nationally recognised New Zealand Recreation Association Parks Categories Framework as a consistent basis to determine the scale, type and distribution of reserve provision required to

meet community needs generated by growth. While not a statutory requirement in itself, it provides Council's mechanism for planning reserve provision in response to that population growth.

- 4.8 Council assesses reserve provision through both the LoS Framework and the statutory reserve contribution framework established under the Local Government Act 2002 (LGA). The LGA provides the statutory basis for reserve contributions, including the ability to require reserve land or equivalent value contributions within the limits established by Section 203.
- 4.9 The reserve contribution requirement reflects the principle that growth generates demand for reserve and recreation infrastructure. Council's LoS Framework then provides the mechanism for determining the scale, type and distribution of reserve provision required to respond to that growth.

Recreation Demand Generated by Growth

- 4.10 The existing Ōhoka Domain, located across Whites Road from the application site, contributes to local reserve provision and serves an established function and catchment. Unlike a neighbourhood park embedded within a residential area, Ōhoka Domain operates as a destination reserve serving both the village and surrounding rural community. The Domain does not solely serve residents within walking distance, and its function cannot be reduced to a local neighbourhood park catchment calculation.
- 4.11 The proposal does not simply gain access to an existing reserve. It changes the relationship between that reserve and its surrounding population by placing a concentrated residential catchment immediately adjacent to it. Further, the existence of an established reserve asset does not remove the need to address the recreation demands generated by new growth. Council's reserve planning framework sets out that reserve provision grows alongside population growth to maintain the intended recreation outcomes for both existing and future residents.
- 4.12 Accordingly, the relevant issue is not whether recreation space already exists nearby, but whether the proposal provides the reserve response required for the growth it generates. This memorandum sets out the requirement for a further 2.5 hectares of neighbourhood park provision within the subdivision itself to address the recreation demands arising from the population growth and intensification introduced by the development.

Parks Categories and Functions

- 4.13 Assessment of a subdivision's open space network must consider both reserve area, and whether the proposed open space network delivers the intended outcomes associated with the functions of reserve types. The scale, residential zoning, and presence of waterways traversing the site trigger distinct greenspace requirements:
- **Neighbourhood parks** (with their overall area requirement calculated on the number of allotments and future residents);
 - **Recreation and ecological linkages** (required at the time of subdivision, adjacent the central (Spring Channel) and southern (Ōhoka South Branch) waterways crossing the site, the requirements

for which would otherwise be illustrated under the District Plan Outline Development Plans, in planned growth areas), and;

- **Esplanade provision** (required at the time of subdivision, adjacent district plan denoted waterway reaches, in this case the northern Ōhoka Stream tributary).

Area Provision and Reserve Type

4.14 Within the reserve hierarchy, neighbourhood parks are developed local parks intended to serve the day-to-day recreation needs of their surrounding residential community¹. Neighbourhood parks provide:

- Safe and functional informal play and kick about space (with usable minimum dimensions, such as an approx. 40 x 70m open field area);
- Recreational facilities such as play equipment to serve different age groups and accessibility needs;
- The resultant range of flexible recreation opportunities sought of a local park.

4.15 As a form of community infrastructure, neighbourhood parks support the day-to-day recreation needs of residents and should therefore be planned as legible and structuring elements within a subdivision layout. They should be readily accessible via a well-connected linkage network, and ideally with more than one road frontage. Their distribution within a subdivision should reflect walkable catchments. On this basis, where situated to the edge of a development area, half the potential walking circle may fall outside the site boundary. As a result, valuable walkable catchment is lost, and the neighbourhood park serves fewer residents than an equivalent centrally located reserve.

4.16 The application's proposed open space network places predominant emphasis on east-west orientated blue-green corridor and linkage reserves. Ecological and movement corridors, including areas associated with waterway setbacks, are important elements of an open space network. Their primary role is to provide connectivity, ecological and landscape functions.

4.17 These linear spaces are not a substitute for identifiable neighbourhood parks that function as destinations for everyday local community recreation. The application treats open space as functionally interchangeable, despite the distinction between:

- reserve types,
- the triggers for their provision, and
- their intended roles within a reserve network.

Application – Reserve Provision Shortfalls

4.18 The LoS Framework recognises the need for neighbourhood parks to be of sufficient size, shape and configuration to function effectively, identifying a minimum park size of 3,000m² and noting approximately 5,000m² as a more useful scale for neighbourhood recreation use. Neighbourhood parks should

¹ Waimakariri District Council Neighbourhood Reserves Management Plan (2015) describes neighbourhood parks as providing informal recreation, play, social interaction and neighbourhood amenity for local communities.

be of a regular form that promotes visibility, maximises usable space, and provides sufficient flat, free-draining open land for a range of recreation activities, including informal ball games. On the ground, this allows room for both playgrounds, informal kick-about space, and multiple users and groups to comfortably share the space.

4.19 The framework requires neighbourhood parks to be provided in proportion to and along with population growth, with an overall provision target of 1.0-1.75 hectares per 1,000 residents. The allotments counted towards these calculations include suburban residential allotments and retirement village residents², though exclude large lot residential zoning; at an allotment scale which can internalise this recreation area provision.

4.20 The updated Scheme Plans (provided 10 September 2026) illustrate approximately 856 residential allotments, and the AEE describes a retirement village of up to 250 units. Applying Council's population assumptions of 2.5 persons per residential allotment and 1.3 persons per retirement village unit results in an estimated population of approximately 2,465 people. Applying the lower end of the LoS provision target (1.0 hectare per 1,000 residents) results in a minimum neighbourhood park requirement of approximately 2.5 hectares.

4.21 The application, however, does not provide any areas which would achieve the requirements for Neighbourhood Parks under the LoS Framework. The revised Landscape Master Plans move away from treating movement corridors and linkage reserves as neighbourhood parks ('destination' reserves), effectively acknowledging that these spaces cannot perform the role of neighbourhood park provision. Once movement corridors and linkage reserves are correctly distinguished from neighbourhood park provision, the remaining shortfall becomes apparent.

4.22 While correcting one issue, the revised Master Plans continue to count private land, utility space and lizard habitat toward recreation provision. These areas neither provide the intended neighbourhood park outcomes nor can they be vested and managed for public recreation purposes. Utility infrastructure establishes a separate land use purpose inconsistent with vesting and management as a neighbourhood park.

4.23 The resulting pattern is one of fragmented and undersized reserve spaces located in residual spaces, rather than functioning as a legible and well-distributed network of neighbourhood parks capable of delivering the neighbourhood recreation outcomes anticipated by the LoS Framework.

² Recreation Aotearoa's framework provides the basis for population-based open space provision. Consistent with this, council population-equivalent and HUE methodologies commonly use reduced occupancy rates for retirement village accommodation, typically around 1.3 residents per independent living unit and 1 resident per care unit, recognising lower household sizes while continuing to include residents within population service calculations.

Ōhoka Residential Subdivision - Proposed Neighbourhood Parks		
Reserve	Area available for vesting as a neighbourhood park	Comments
R1 (Lot 5001) ('Heritage reserve')	651m ² (as illustrated by Scheme Plan, Sheet 1 of 7). Insufficient area provision suitable for vesting - unless as a linkage provision.	At 651m ² and 14.2m in width, the edge-located space also falls well below the minimum dimensions anticipated for a public park providing a play area. Its form and scale are more characteristic of an intra-block linkage than a neighbourhood park.
R2 Village Green	Approx. 3,000m ² (though in private ownership, therefore no area provision suitable for vesting)	As the space is not publicly owned, it cannot be relied upon as permanent public open space provision. Council cannot secure its future design, management or retention. Although described as publicly accessible, its location and design are anticipated to favour use by patrons of the adjoining commercial centre rather than broader community recreation.
R3 Polo grounds	Stage 5: separate and subsequent consent application, therefore no guaranteed area provision.	As the space is not publicly owned, it cannot be relied upon as permanent public open space provision. The applicant would also need to resolve the safety and space requirements associated with locating a public playground adjacent to a polo ground, including horse exercise, warm-up and ball run-off areas. We are not confident that these concerns could be resolved in a way that allows for adequate use as a public reserve.
R4	3,000m ² indicated in landscape plans. However, within Stage 5, and as above: no guaranteed area provision	The Scheme Plan (Sheet 3) illustrates this area within Stage 5 and the later polo ground consent area. The space has limited road frontage and passive surveillance. Its long, narrow form creates awkward proportions and constrains its functional recreation use.
R5	1,610m ² within a larger lot. Utility use and use for lizard habitat negates already undersized provision. No area provision suitable for vesting for Neighbourhood Park.	This edge-located reserve includes an approximate 1,600m ² neighbourhood park within Lot 5016. Separately, the lot is also identified for lizard habitat (pending DoC consideration). The proposed park area is approximately half the minimum size required for a neighbourhood park. Further, an existing pylon onsite establishes a utility use that conflicts directly with the proposed recreation purpose of the lot (Master Plan, Sheet E7).
R6	Estimated at 1,500m ² within a 2,444m ² allotment. At half the minimum area requirement there is insufficient area to vest as a Neighbourhood Park	Edge-located lots 5027 (2,444m ²) and 5028 (781m ²) are illustrated as a combined reserve area on Scheme Plan Sheet 7 of 7, within large lot residential zoning, where the provision is not required for recreation purposes. However, an overland flow path traverses the 10 m wide Lot 5028, rendering it unsuitable for recreation use. If approximately 1,000m ² of Lot 5027 is also required for lizard habitat, only around 1,500m ² remains available for recreation purposes, approximately half the minimum area required for a vested neighbourhood park.

R7	1,100m ² (across lots 5025 and 5026). Insufficient area to vest as a Neighbourhood Park	This edge located area is split across two lots (379m ² and 965m ²). The lots occupy residual space around a road bend and are separated by the road, within the Large Lot Residential Zone where neighbourhood park provision is not required. The larger lot is also traversed by an overland flow path. These spaces provide limited function opportunity, i.e., little more than informal seating and planting. They are substantially undersized for neighbourhood park purposes.
Collectively, no proposed neighbourhood park achieves the scale, configuration, ownership status or reserve function anticipated by the LoS Framework. Consequently, the application does not demonstrate a functional neighbourhood park network capable of delivering the intended neighbourhood park outcomes.		

4.24 The updated Scheme Plans (Stages 1-7) do not identify reserve type and do not distinguish between neighbourhood parks, linkages, esplanade reserves or other reserve functions. Nor do the area calculations distinguish between waterways and their associated reserve margins.

4.25 The lodged application AEE reserve provision assessment and associated area calculations have not been updated to reflect either the revised Masterplans or the increased extent of SMA-related reserve requirements. As a result, these application documents do not provide an accurate or consistent account of recreation reserve provision shortfall across the site.

4.26 The northern Ōhoka Stream tributary triggers a minimum 20m wide **esplanade reserve** requirement under both the District Plan and Section 230 of the Resource Management Act (relating to esplanade reserves and esplanade strips). This width requirement should be measured out from the top of bank on each side of the waterway. However, the Scheme Plans (Stage 1: sheets 1-3) illustrates only 7.5 m of esplanade reserve provision against the required 20m width.

4.27 Sections of the 20m esplanade reserve requirement are shown to be occupied by adjoining allotments, SMA areas and roadway corridors. The updated masterplan material appears to conflate reserve provision with building setback requirements, resulting in reserve land being effectively reduced by development components. This level of detail and conflicting use is not illustrated by the updated master plan sheets, in particular: Sheets 11, 23, 57 and 58.

4.28 For the remaining two denoted waterways, **recreational and ecological linkages** esplanade reserve requirement are shown to be occupied by adjoining allotments, SMA areas and roadway corridors. The updated masterplan material appears to conflate reserve provision with building setback requirements, resulting in reserve land being effectively reduced by other development components.

4.29 The result is that the reserve provision is reduced by overlapping development requirements, with land intended to contribute to reserve outcomes also being relied on for other purposes. Recreation and ecological linkages, SMA areas, esplanade reserves and building setbacks (within adjacent allotments)

perform *distinct* functions and should not be aggregated into a single reserve provision outcome.

- 4.30 Council's minimum expectation for intra-block **linkages** is also a 10m width, with narrower provision accepted only as an exception in locations where this is not possible to achieve. This width is required to accommodate movement, CPTED outcomes and amenity. The application instead adopts 8m wide linkages as a standard treatment throughout the development area. For a new greenfield development, council sees no reason why an adequate 10m width to support user safety wouldn't be achievable.

Vegetative screening as key mitigation

- 4.31 The planting strategy relied upon by the application is relevant to both the open space outcomes proposed and the development's relationship with its receiving environment. Council's Greenspace Team reviews proposed reserve and streetscape planting and is responsible for the long-term management implications.

- 4.32 The proposed planting mitigation strategy is described as visual softening and integration by the updated application landscape assessment. However, the application's approach to integrating the development heavily on vegetative screening, both to the boundaries, and throughout the development area.

- 4.33 Screening and integration are not the same thing. Integration is achieved through subdivision structure, density, layout and built form responding appropriately to context. Screening is a mitigation response intended to reduce the visibility of development that is otherwise difficult to integrate.

- 4.34 In this instance, the scale and density of development generate a reliance on planting as the primary means of addressing character and context effects. However, trees cannot substitute for resolved and acceptable development form, density or layout. Reliance on screening as the principal response indicates that integration has not been achieved through first-order design decisions. Rather vegetation is relied on to screen the resulting effects.

- 4.35 This concern is reinforced by the visual material, which depicts a heavily vegetated, near forest-like environment across the site. The Masterplan Illustrative Renders (CP, Sheets 31, 33-37) provide illustrations of substantial scale trees through internal areas of the development including street trees and planting on private lots.

- 4.36 The well treed outcome relied upon by the application is not reflected in the level of planting to be implemented, in that it is only sought to meet council requirements; this includes one street tree per 20m. Further, the applicant's reliance on vegetation becomes untenable at a practical level. The council arborist's evidence has identified conflicts between street trees, berms, swales, utilities and on-street parking. These conflicts negate the deliverability and long-term success of the planting strategy. The forested outcome is not reflected in the planting standards proposed and is unlikely to be achieved through standard streetscape planting, more so where planting is constrained by stormwater and infrastructure requirements, trees proposed adjacent or

within swales and undersized berms.

- 4.37 The Draft Landscape Management Plan repeatedly defers key landscape outcomes to future landscape plan approval, detailed design and implementation stages. While those future decisions are frequently framed as matters for the Project Landscape Architect, Council is ultimately responsible for reviewing and approving reserve and streetscape planting associated with publicly vested assets. Accordingly, a number of the planting outcomes relied upon by the assessment remain unresolved, yet those same outcomes are used to support conclusions regarding landscape integration and visual effects.
- 4.38 The application places substantial weight on a planting response that is both aspirational and fundamental to its mitigation case, rather than demonstrating that the subdivision itself achieves an appropriate response to its receiving environment. Council also does not support assuming ongoing maintenance responsibility for extensive public-facing boundary screening.

Conclusion

- 4.39 The application's open space network is weighted heavily toward ecological corridors, SMA areas, riparian margins, esplanade reserves and associated movement corridors, with the application landscape rationale turning toward *"the site's unique ecological and waterway features to retain and enhance the natural character and value of the landscape"* (Updated Masterplans, Sheet 51). These spaces perform important ecological, stormwater, landscape and access functions. However, they address only part of the open space outcome required, and do not remove the need for a distinct neighbourhood park layer.
- 4.40 The Master Plan open space provision and design summary (Sheet 51) critiques more traditional park provision, describing outcomes where *"Open spaces form isolated pockets rather than constituting an integrated, connected network that meets the needs of residents and serves the wider community"*.
- 4.41 Neighbourhood parks are not inherently disconnected. This outcome arises because the subdivision layout diminishes the role of neighbourhood parks as legible, structuring and well-connected recreation destinations. A well-considered subdivision layout would provide for their legibility, wayfinding and integration within a wider open space network. Instead, neighbourhood parks emerge in residual, constrained and undersized spaces, edge locations, private land and dual-purpose sites remaining after other site requirements have been accommodated.
- 4.42 Ironically, having diminished neighbourhood park provision within the application site, the enclosed and otherwise internally focused development orientates pedestrian crossing points and the commercial centre location toward an external destination park, the Ōhoka Domain, to perform that role. The application effectively treats the Domain as an extension of the subdivision's neighbourhood park network and part of the development's reserve response. However, the Domain reflects and serves the existing settlement pattern and wider rural community rather than functioning as neighbourhood park provision for a higher-density residential catchment.

- 4.43 This inconsistency exposes a weakness in the proposed reserve network rather than a strength. The application Urban Design report presents access and activation of Ōhoka Domain as a positive outcome. However, activation is not a substitute for providing reserve infrastructure in response to growth. In doing so, the proposal relies on recreation infrastructure outside the development area to perform part of the neighbourhood recreation role not addressed within the site itself.
- 4.44 Furthermore, Ōhoka Domain already serves the recreational needs of the existing community and cannot reasonably be relied upon to accommodate the additional demand generated by the proposed development. As such, it does not provide an appropriate substitute for neighbourhood reserve provision within the site itself.
- 4.45 The development does not provide functional neighbourhood parks capable of delivering the neighbourhood recreation outcomes anticipated by Council's reserve planning LoS framework. As a result, it fails to provide the neighbourhood park layer of community infrastructure anticipated by that framework. This is not simply a shortfall against a Council LOS measure. The proposal transfers growth-generated demand onto an existing reserve asset rather than providing a reserve response anticipated to accompany that growth.
- 4.46 The neighbourhood recreation needs generated by the development remain unresolved, particularly the provision of walkable neighbourhood recreation destinations within the development itself. The shortfall reduces the ability of the future community to access local recreation, informal play, amenity and public third-space opportunities. The recreation and open space outcomes anticipated for a well-functioning urban environment are not demonstrated.

Areas of Agreement

- The application retains and enhances existing waterways and associated ecological corridor and these are positive components of the proposed open space network.
- The application provides a connected network of walking and cycling routes through the site and a logical intra-block linkages pattern.
- Ōhoka Domain is an important and established recreation asset serving the wider community.
- Planting and landscape treatment can *assist* in reducing visual contrast between development and its surrounding environment.

Areas of Disagreement

- The application treats ecological corridors, SMA areas, riparian margins, esplanade reserves and associated movement corridors as a comprehensive green space outcome when, in my opinion, they address only part of the open space outcomes sought and do not remove the need for a distinct neighbourhood park layer.
- The application does not adequately distinguish between reserve types, reserve functions and their respective provision requirements.

- The application does not provide a sufficient neighbourhood park layer within the reserve hierarchy and neighbourhood parks do not emerge as a clearly identifiable and legible layer within the proposed open space network.
- The application relies on open space area as a proxy for recreation provision, rather than demonstrating achievement of neighbourhood recreation outcomes.
- A number of proposed neighbourhood parks are undersized, constrained, privately owned, programmed for alternative functions, or otherwise unsuitable for vesting as neighbourhood parks.
- Existing recreation assets, including Ōhoka Domain, do not remove the need to provide for recreation demand generated by the proposed development.
- The application does not demonstrate that neighbourhood reserve provision responds appropriately to the growth and intensification generated by the development.
- The reserve network illustrated by the application does not adequately demonstrate how the neighbourhood recreation outcomes will be achieved for future residents.
- The application places undue reliance on vegetative screening as a mitigation response. In my view, vegetation is being relied upon to screen the effects of development rather than integration being achieved through subdivision structure, density and layout.

Remaining information gaps – relevant to recreation outcomes:

- Reconciled reserve provision schedule identifying reserve type, area, ownership, vesting status and reserve function across all application documents.
- Reconciliation of esplanade reserves, recreation and ecological linkages, SMA areas, riparian margins, building setbacks and adjoining allotments.
- Functional consideration of proposed neighbourhood parks, including usability, play opportunities and informal recreation function.
- Assessment of the compatibility between the proposed polo ground operation and any adjacent public playground provision.
- Demonstration of how reserve provision responds to the recreation demand generated by the proposed population growth.