

**BEFORE THE INDEPENDENT HEARING COMMISSIONER
APPOINTED BY THE HAMILTON CITY COUNCIL**

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of an application to demolish the Hamilton Municipal Pools

BETWEEN **HAMILTON CITY COUNCIL**
Applicant

AND **HAMILTON CITY COUNCIL**
Consent authority

**STATEMENT OF EVIDENCE
OF
JUDY PATTERSON
ON BEHALF OF
SINK OR SWIM**

Dated 28 October 2019

Sink or Swim

36 Normandy Avenue

Hamilton 3206

Phone 021 0437 668 (Katherine Luketina)

Email: sink.or.swim.hamilton@gmail.com

INTRODUCTION

1. My full name is Judy Patterson. I have a BSocSc, Dip Tchg, and TTC. I am a member of CDANZ.
2. I am here today as a founding member of the SOS core group.
3. Before the Municipal Pools closed in 2012 I swam there several times a week, in the adult squad that occupied the pool after the elite triathletes had swum from 5:30 am to 6:30 am and the elite swimming club squad from 6:30 to 8:30 am. We were trained by the former South African champion swimmer Rob De Villiers and highly successful head coach John Pike, who had trained many national champions.
4. However, my association with the Municipal Pools dates back to 1975, when I moved to Hamilton to train as a teacher, then through my many years of teaching in Hamilton and working as a careers adviser, and then when the off-peak time adult squad started up.

CODE OF CONDUCT

5. I acknowledge that as a member of Sink Or Swim I am not independent of it, so my evidence cannot be regarded as expert evidence. Nonetheless, I have read the Environment Court Code of Conduct for Expert Witnesses, contained in the Environment Court's Practice Note 2014. I have complied with this practice note in preparing this statement of evidence. I confirm that the issues addressed in this brief of evidence are within my area of expertise, except where I state that I am relying on the evidence of another person.
6. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed. I have specified where my opinion is based on limited or partial information and identified any assumptions, I have made in forming my opinions.

SUMMARY OF EVIDENCE

7. The Hamilton City Council Municipal Pool is a valuable Hamilton city and Hamilton CBD amenity and asset. Rate-payers fund and use this asset and the public must have continued use of it as a city amenity, fully maintained by the Hamilton City Council.

RATIONALE:

8. At a time when the CBD Association and the Hamilton City Council are seeking to rebuild and retain CBD business occupancy, following a drift to northern centres such as The Base, the HCC Municipal Pool is an important asset to the CBD. The HCC Municipal Pool is an amenity and asset which:
- attracts people to the central city. People who swim there will also use the city centre for shopping
 - fulfils an important fitness opportunity for people who prefer to swim rather than go to gyms. Regular lunchtime swimmers have easy access, often by foot, to a local out-door, heated pool rather than using a vehicle to travel to a pool in an outer suburb
 - contributes to the health and well-being of city workers at a time when there is increased concern about major health-related issues such as obesity and diabetes
 - serves organisations such as the NZ Police (100m from the pool) which has a required fitness component for its officers
 - is the only out-door, heated in the city that is deep enough, and of the appropriate shape, for lane-swimmers and tumble-turners
 - serves people living in the CBD including 48 apartments in Knox Street, 200 m from the pool, and 46 apartments in Tisdall St, immediately downhill of the pool. It should be noted that some of the CBD apartments provide no parking facilities for residence, on the expectation that the city will provide everything they need within walking distance.
 - serves people living in the eastern suburbs where there is no heated public pool
 - has a 2013 Census population projection for 2018 of approximately 6446 in a radius of 1 km of the 6 x 25m-lane pool. This count is some 31% more than Waterworld Te Rapa, which has a population of 4890 for a 16 x 25m-lane pool
 - is used by numbers of schools in February and March for their annual school swimming sports and for other swimming activities
 - is an essential facility in terms of “Learn to Swim” campaigns. Hamilton city is NZ’s largest inland city and is sited beside a fast flowing river. NZ’s drowning statistics are a cause of great concern with Easter 2012 having a sad toll. The two smaller pools at the HCC Municipal Pool are ideal for those learning to swim
 - provides an historical asset to the city which is increasingly becoming bereft of our history and heritage
 - Is situated immediately beside the Te Awa river path leading to Ngaruawahia, the only public swimming pool on a cycle trail, making it ideally suited for multisport athletes.

9. In short, the HCC Municipal Pool is an essential and valuable amenity within the CBD. Its accessibility to the CBD is an asset which must be retained.
10. According to a HCC report entitled **Hamilton City CBD facts**: “Combined with nearby Frankton and Hospital zone, about 50% of the city’s employment is within very close proximity of the CBD”. These workers need amenities, including a public pool.

RESIDENT POPULATION SERVED:

11. The Municipal Pool services an area with a Population Count per Area Unit (2018 projection based on 2013 Census) of approximately 6446 inhabitants within a 1 km radius of The Pool. It should be noted, however, that substantial new apartments are in planning or development for the central city, the former Hills Laboratories, the current Waikato Regional Council building, and 1 Cook St. These dwellings would add approximately 300 to the count with the total rising to 6744. Although many areas of Hamilton are experiencing infill growth, it is really only the central city including Frankton, and Hamilton East, that have large multi-storey apartment complexes going up. No development this large appears to have been made in the other two pool zones.
12. This Municipal Pool count is only slightly less than the Population Count for a similar radius of the Gallagher Pool at 7038. (If this was then compared with the revised count of 6744 there would be an almost equal Population Count)
13. The Municipal Pool Population Count is approximately 31% greater than that of the Te Rapa Waterworld complex Population Count of 4890. See Table 1 below for relative population densities.
14. With the burgeoning apartment population in the inner city, Frankton and Hamilton East, it is important for the city to continue to provide a public pool that residents can walk to, especially given that some of the new inner-city apartment blocks are being built with no parking. It is impractical for residents to have to take a bus and then a possibly lengthy walk to Gallagher Pool or Waterworld, depending on where the particular bus route stops.

Table 1: Number of inhabitants within a 1 km radius of each of the three HCC Swimming pools in Hamilton

Source: 2018 projections 2013 Census of Population and Dwellings: Final Population Counts.

Waterworld Te Rapa

Area Unit	Suburb name	2018 Populations (2013 Census)	Approx % falling within 1 km radius	Population falling within 1 km radius
528403	Te Rapa	390	10%	39
528700	Beerescourt	3540	Not quite 100%	3505
528 800	Maeroa	4080	33.3%	1346
				Total: 4890

Gallagher Pool Melville

Area Unit	Suburb name	2018 Populations (2013 Census)	Approx % falling within 1 km radius	Population falling within 1 km radius
529200	Melville	5370	100%	5370
529300	Glenview	6000	20%	1200
530400	Bader	4680	10%	468
				Total: 7038

Total: 2089

Hamilton Municipal Pool

Area Unit	Suburb name	2018 Populations (2013 Census)	Approx % falling within 1 km radius	Population falling within 1 km radius
529100	Hamilton Lake	4700	17% (lake area omitted, residential area only included)	799
529700	Hamilton Central	3690	25%	923
530100	Peachgrove	3620	10%	362
530200	Hamilton east	4470	75%	3353
530300	Naylor	5050	20%	1010
				Total: 6446
			With Ham E developments	6744

HAMILTON CBD – LARGE BUSINESSES AND OCCUPANCIES

15. Within a 1 km radius of the Municipal Pool there are a number of organisations and/or buildings with large people occupancies. The staff of these organisations can be regarded as potential (and existing) customers. Some, with approximate staffing numbers, are as follows:

Accommodation:

- YMCA Hostel
- Knox Street Apartments
- Motels – Ventura
 - Ashwood Manor
 - Aspen
 - Tudor Lodge

Rooms

- 80
- 48
- 50 rooms plus staff
- 27 rooms plus staff
- 31 rooms plus staff
- 24 rooms plus staff

18. A few blocks away on Mill St is the Village Quarter, where a development of 43 apartments has been recently built. On the southern boundary of the CBD, Palmerston and Hammond Sts are also experiencing a massive intensification of residential apartments.
19. There are many other apartment blocks springing up in the inner city and Frankton. Most of these are so new they are not reflected in the 2013 census, from which the 2018 figures are extrapolated.
20. In contrast to the Municipal Pools catchment area, the Gallagher Pool has only two large organisations within the 1 km radius, i.e. Gallagher Industries and Bunnings, and Melville High School with priority entry. Waterworld Te Rapa has one large organisation within 1 km radius i.e. Bunnings. The rest of the commercial areas near Gallagher and Waterworld are occupied predominantly by SMEs.
21. There are only four accommodation providers within 1 km of Waterworld, and none near the Gallagher Pool.

SUMMARY AND CONCLUSION:

22. The Municipal Pool is an asset to, and an essential amenity within, the CBD and the city. It:
 - brings a healthy (and health) perspective to the cityscape
 - supports swimming as an essential element of NZ culture and geography
 - brings an element of heritage and history to the city
 - The combined density of accommodation, housing and workplaces within the 1 kilometre radius surrounding the Municipal Pools is among Hamilton's highest. The Hamilton City Council Municipal Pool must be retained for public use.