

20 December 2021

Our job no. 717539

Resource Consents
Rotorua Lakes Council
Private Bag 3029
Rotorua Mail Centre
Rotorua 3046

The Property Group Limited
Wellington Office
PO Box 2874 Wellington 6140
Level 11, Cornerstone House
36 Customhouse Quay
Wellington 6011

Dear Sir / Madam

Application for Resource Consent – 7 Tryon Street, Rotorua

Please find enclosed a resource consent application on behalf of Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development (HUD) to use the existing site and hotel buildings at 7 Tryon Street (Lot 1 DPS 26397) (the site) for Contracted Emergency Housing. HUD is making this application on behalf of the hotel operator, who will be the consent holder.

This application includes a Form 9, a detailed description of the proposal, along with an assessment of environmental effects and supporting appendices.

A lodgement deposit of \$1500 will be paid by electronic transfer upon receipt of an invoice.

The Property Group Limited (TPG) is the agent for this application and should be the contact for any correspondence or telephone discussions.

I would appreciate being able to review draft conditions prior to consent being issued.

Please contact me should you have any questions regarding the application.

Yours sincerely



Alice Blackwell

Senior Planner

04 470 6105 / 027 462 5769
ablackwell@propertygroup.co.nz

Form 9

Application for Resource Consent - Section 88, Resource Management Act 1991

To:	Rotorua Lakes Council
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Applicant:	Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development
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Agent:	Alice Blackwell Senior Planner The Property Group Limited (TPG) 0274 625 769 ablackwell@propertygroup.co.nz
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Address for service:	The Property Group Limited PO Box 2874 Wellington 6140 Attention: Alice Blackwell
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Invoice details:	Ministry of Housing and Urban Development c/- The Property Group Limited PO Box 2874 Wellington 6140 Attention: Alice Blackwell
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Site address:	4 Tryon Street, Whakarewarewa, Rotorua
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Legal description:	Lot 1 DPS 26397
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Owner of site:	SHSM Investments Limited
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Consent for:	Land Use Resource Consent (Non-Complying Activity) No other resource consents are required for this proposal
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Description:	Resource consent to use the existing site and hotel buildings for Contracted Emergency Housing.
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Enclosed:	Application and AEE Appendix 1 – Record of Title Appendix 2 – Site Plan Appendix 3 – Contracted Emergency Housing Factsheet
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Appendix 4 – Site Management Plan

Signed:

AJ Blackwell

Alice Blackwell

Senior Planner

Date:

20 December 2021

Application for Resource Consent



Contracted Emergency Housing

7 Tryon Street, Rotorua

**Te Tūāpapa Kura Kāinga – Ministry of
Housing and Urban Development**

December 2021

Quality control

Title:	Resource consent for Contracted Emergency Housing at 7 Tryon Street, Rotorua
Client:	Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development
Job number:	717539
Prepared by:	Anna Muller – Planner
Signature:	
Reviewed by:	Alice Blackwell – Senior Planner
Signature:	

1. Introduction

On behalf of the hotel operator, Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development (HUD) hereby applies for resource consent from Rotorua Lakes Council (Council) to use the existing site and buildings at 7 Tryon Street for Contracted Emergency Housing. The hotel has been contracted by HUD for an initial one-year period; the ongoing need for this site will be reviewed at least annually. Resource consent is sought for a duration of five years, noting that it may be released from this purpose before this time, as additional housing (including affordable market rental housing and public housing) is supplied in the city. The hotel will revert to its traditional tourist accommodation as more suitable long-term accommodation options become available in the district.

The site is in the Commercial 3 Zone (Neighbourhood Centres) of the Rotorua District Plan (District Plan) and requires resource consent for the reasons outlined in section 4 of this report.

In short, the proposal requires resource consent as the Contracted Emergency Housing model does not meet a defined activity provided for within the District Plan.

1.1 Background

Rotorua city has experienced strong population growth over an extended period of time. The housing supply has not responded, and the number of building consents granted remains one of the lowest in New Zealand by population. This has resulted in a sharp increase over the past five years in median rents (54 percent) and house prices (84 percent) leading to increases in homelessness, including overcrowding. This has placed significant pressure on public, transitional and emergency housing. The volume of Emergency Housing Special Needs Grants (EH-SNGs) in Rotorua is now the highest in the country by population.

A Rotorua Housing Taskforce was established in March 2021 (made with members from Rotorua Lakes Council, Te Arawa Iwi, HUD, MSD, Kāinga Ora and Te Puni Kōkiri) to develop options for providing better support and outcomes for people living in emergency housing motels in Rotorua, including contracting entire motels and providing Contracted Emergency Housing (described in more detail in section 3.2 and [Appendix 3](#)).

It is expected that this combination of actions in Rotorua will result in increased quality and suitability of accommodation, increased support services, increased safety, better pathways to more-permanent housing, and streamlined assessment and placement processes for those with a housing need.

2. Site description

2.1 Location and description

The 2,864m² rectangular shaped subject site has frontage to Froude Street along its northern boundary and Tryon Street to its eastern boundary (see *Figure 1* below).



Figure 1: Aerial photograph of the site (Source: Rotorua Council Geyserview)

The site is currently occupied by an existing hotel which has its entrance at the southeast corner of the site and exit at its northeast corner, both to Tryon Street. A large three storey L-shaped building accommodates the office, hotel facilities and conference room on the ground floor with accommodation on the first and second storeys.

A pool is located within an internal courtyard at the equivalent of the first floor level and there is also a games room and lounge in the northwest corner of the site next to the pool. Carparks are located at ground floor level along the eastern and southern boundaries of the site.

The surrounding properties include commercial, residential and tourist accommodation land uses as well as vacant land to the west of the subject site.

The existing buildings within the site are dedicated to the hotel, which has been in operation since the 1970s. The configuration of the units is outlined in Table 1 below and shown on the Site Plan and supporting building layout plans in [Appendix 2](#). The overall occupancy levels are based on the number of beds typically accommodated within each unit. For example, a double bed can sleep two people, a single bed one person. The occupancy rate is therefore based off the nature of the unit and the beds within. It is noted that the Manager’s unit is not included in the table below, nor are infants aged less than 18 months.

Table 1: Configuration of units at 7 Tryon Street excluding manager’s accommodation

Type of unit	No. of units	Max No. of occupants
Studio units	28	84
One bedroom unit	11	33
Total	39	117

There are 28 carparks located within the property. There is a shared laundry facility on site, which can be utilised by the site occupants.

The configuration of the site is shown on the Site Plan in Appendix 2, we have also included in Appendix 2 the building plans of the hotel to help with understanding of the layout of the hotel, noting that the hairdressing salon showed on the building plans is used by the hotel as a gym.

2.2 Previous resource consents

A search of the Rotorua District Council property files has highlighted previous planning approvals in relation to the establishment of the hotel. It is noted that our search revealed no resource consents that restrict the way that the hotel is operated, including no limit on the number of occupants or their length of stay.

Table 2: Previous planning approvals for the subject site.

Date granted	Resource consent No. / reference	Description
6/6/1973	RC3421	Specified departure – 30 unit hotel within boundary restrictions
4/5/1982	SP3107	Signage
24/5/1994	SP1131	Signage
1/6/1994	SP1135	Signage
26/5/2008	RC8962	Land use – Signage exceeding site maximums

It is noted that the decision relating to the resource consents above notes that the hotel activity itself was a Permitted Activity, but the physical construction of the complex required resource consent as the building was within the boundary restrictions. Consent was also required for hotel signage.

The site has been used for Contracted Emergency Housing since 1 July 2021.

3. Proposal

3.1 Overview

The proposal is to use the existing buildings and facilities on the subject site for Contracted Emergency Housing, which is primarily for families and whānau with children, young people and people with disabilities. In some instances, this will include other vulnerable individuals such as Kaumātua and Kuia (i.e. elderly), however, these will be the exception only, and so the vast majority of occupants will be families and whānau with children.

The proposal does not include any physical alterations to the existing hotel complex.

All 39 accommodation units on the have been contracted by HUD. The Housing Service Provider use the existing reception area and former gym.

WERA Aotearoa is the contracted Housing Service Provider for the subject site, however, it is possible that one of the other Housing Service Providers could take over the management of the site in the future. Any future Housing Service Provider would operate the site in the same way as described in this



application. It is intended that the proposed use of the site and buildings for emergency housing purposes will be for an initial one year period.

Resource consent is sought for a maximum duration of five years. HUD will review the ongoing need for this site will at least annually. The traditional hotel operation will resume as the demand for emergency housing subsides. Therefore, the use of the site and facilities is for a temporary period and the proposal does not represent the permanent conversion of tourist accommodation to a permanent residence.

3.2 Contracted Emergency Housing

Emergency Housing Special Needs Grants (EH-SNGs) were introduced in 2016 to help vulnerable individuals and families with an immediate housing need to meet the cost of staying in short-term (7 days at a time) accommodation. While the SNG is based on a 7-day accommodation cycle, in reality the individuals may be accommodated within the same site for a longer period. Emergency housing is most often provided through motels and although not ideal, it is a preferable option to people living in cars, staying in overcrowded housing, sleeping in parks or on the street.

There has been significant growth in EH-SNG numbers over the last two years with the volume of EH-SNGs in Rotorua being the highest in the country by population. In addition, concerns have arisen that the initial/previous model of providing emergency housing via EH-SNGs without supervision or support was not consistently ensuring safe, adequate and suitable housing for those who need it.

A Rotorua Housing Taskforce was established in March 2021 (made up of Rotorua Lakes Council, Te Arawa Iwi, HUD, MSD, Kāinga Ora and Te Puni Kōkiri) to develop options for providing better support and outcomes for people living in emergency housing motels in Rotorua. HUD was tasked with contracting specific motels to provide emergency accommodation for whānau with children and working with iwi to provide wrap around support services to meet the needs of whānau and children staying in motels.

The first point of contact for those requiring emergency accommodation is the Rotorua Emergency Housing Hub, Te Pokapū who assesses the needs of whānau and refers them to a provider that can match the accommodation that suits their household makeup.

Appendix 3 includes additional information about Contracted Emergency Housing. Contracted Emergency Housing includes onsite supervision and management, which is provided by the Housing Service Provider (Emerge Aotearoa). Site management details and general information around onsite support services are further described below.

3.3 Service Provider and Site Management

3.3.1 Site Management

WERA Aotearoa is the Housing Service Provider for 7 Tryon Street. WERA Aotearoa has prepared a Site Management Plan (SMP) attached at Appendix 4. The supervision and management roles are summarised in Table 3 below.

Table 3: Summary of supervision and management roles

Role	Description
Hotel Operator	As required only
Cleaning staff	Rostered Daily
Support Service staff	Mon – Fri 9am till 5pm
Roaming Security	Roaming security will be in operation between the hours of 9am-5pm and on call as required. Security contact number is 0272328970.
Static Security	1 security guard will be onsite 24/7.

3.3.2 Support Services

WERA Aotearoa will work alongside the accommodation operator to manage referrals to the accommodation to ensure whānau accepted into the space are matched with an appropriate unit to their household make up. WERA Aotearoa will carry out a needs assessment for whānau once referred and then an individual plan will be made with the whānau. This plan could mean signing clients up to different support programmes or engaging other agencies. Support services to each placed household will be based on the principles of Te Hau ki te Kāinga. The support services include:

- Developing, with the household, an individualised ‘Housing Transition Plan’ to help the household work towards becoming a self-sufficient, vibrant whanau.
- Working with each placed household to identify and manage issues that arise during their stay in the property (e.g. damage or rent arrears).
- Supporting whanau to:
 - Access appropriate support for identified health and social issues by referring to other health and social service agencies.
 - Carry out actions identified in their Housing Transition Plan (including making and attending appointments with relevant health and social service agencies).
 - Identify and secure sustainable long-term housing that meets their needs and to assist them to move into that housing.
 - Where appropriate, ensure that placed households are registered with the MSD Social Housing Register.
 - Ensure that any issues that may threaten the sustainability of the new housing solution are identified and addressed early.

It is intended that there will be a general no visitors policy, however exemptions may be made on a case-by-case basis but only if preapproval has been given by the site’s security/support services provider.

More detail is provided in the Site Management Plan (SMP) at [Appendix 4](#). Adherence to the SMP is offered as a condition of consent.

3.4 Physical works

This application seeks authorisation only in relation to the proposed change in activity. No physical works are proposed to the buildings. The Contracted Emergency Housing activity will continue to utilise all existing site features in a manner very similar to the existing hotel operation. The site features and layout are shown in the site plan at [Appendix 2](#).

3.5 Reversion to Hotel activity once emergency housing activity ceases.

As noted above, the intended duration of emergency housing operating from the site is for a period of up to five years, after which time it is intended that the long-standing hotel activity will resume (if this hasn't occurred already within this window). All necessary approvals are sought to enable the activity on the site to transition back to hotel use, and this forms part of the proposal.

4. Statutory framework

4.1 Rotorua District Plan

The subject site is located in the Commercial 3 Zone – (Neighbourhood Centres) of the District Plan (see Figure 2 below).

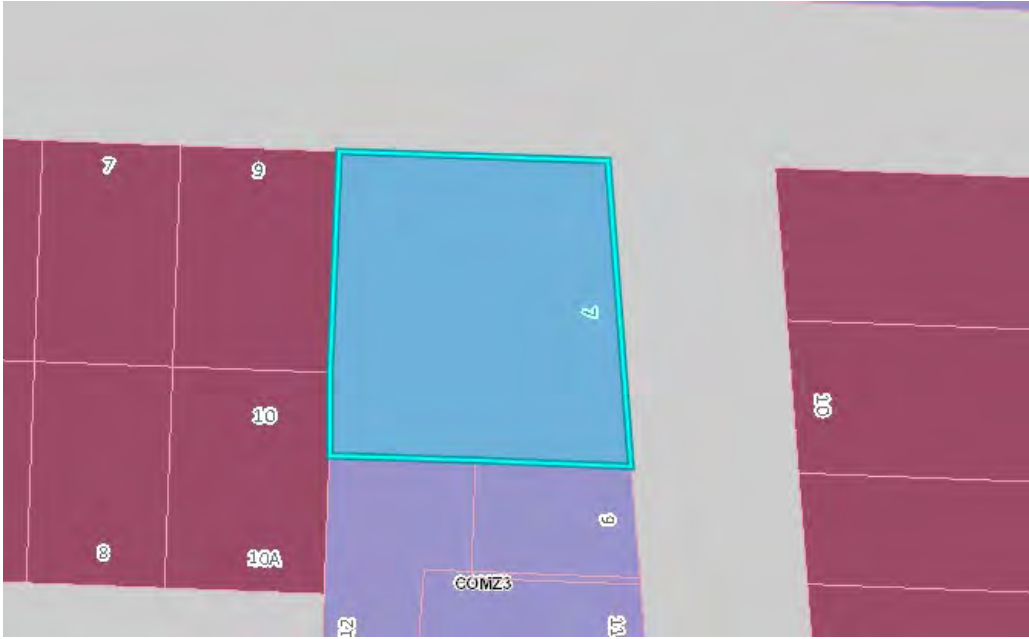


Figure 2: District Plan excerpt showing subject site in the Commercial 3 zone of the District Plan (outlined in blue). The site adjoins land in the Commercial 4 zone to its west (shown in maroon).

4.2 Zone character and purpose

As shown in Figure 2 above, the site is located entirely within the Commercial 3 Zone. Effects cannot be considered in a vacuum – with the District Plan providing the relevant framework under which the appropriateness of the activity and resulting degree of effects are to be considered. The discussion below takes stock of the overarching strategic direction relevant to the COMZ3 zone and provides an assessment as to whether the intended use of the site aligns with the land use strategy of the District Plan.

4.2.1 Commercial 3 – Neighbourhood Centres

The purpose of the Commercial 3 Zone is to provide a level of convenience to residents within the immediate vicinity. It is anticipated that lower levels of pedestrian and traffic movement occur compared with other commercial centres, but at a higher level than the surrounding residential environment.

To illustrate this point, the District Plan describes the Neighbourhood Centres as:

“Small clusters of convenience stores such as dairies, chemists, hairdressers and takeaway outlets that provide day to day services to residential areas located within the immediate vicinity. These centres are dispersed throughout the residential zones and are normally located on corner sites. Buildings are no more than 300m² in ground floor area and are usually no more than one storey in height. These areas have lower pedestrian and traffic movement compared to other commercial centres, however they provide an active environment, with higher levels of lighting and traffic movement in comparison to the surrounding residential environment.”

It is noted that the Commercial 3 zone framework provides for a level of residential living as a permitted activity, through the provision of household accommodation above the ground floor.

4.2.2 Appropriateness of site and underlying zoning for proposed activity

‘Household units’ are provided for in the Commercial 3 zone as a permitted activity where they are not located on the ground floor. ‘Community housing’ is provided for as a discretionary activity, while ‘tourist accommodation’ must be considered as a non-complying activity. The proposed activity is not strictly any of these activities, which means it must be considered as a non-complying activity.

Despite being a non-complying activity, the proposal and site have a number of distinguishing factors, which are material when considering the activity against the applicable District Plan framework relevant to the underlying Industrial zone.

1. The site is surrounded by Commercial 4 zoned land (adjoining to its west and across the road to the east) which provides for tourist accommodation as a permitted activity.
2. The proposed activity will be fundamentally similar to the existing and long-standing hotel operation – whereby temporary accommodation will continue to be provided (albeit for people without permanent accommodation). The proposed activity will occur in a supervised environment, utilising existing buildings and site features that require no physical modification to enable the activity to occur. It is noted that there will continue to be no accommodation units on the ground floor.
3. The proposal will not compromise the future development of the site to provide activities more typical of a neighbourhood centre.
4. The application is for a temporary period while there is an ongoing demand for emergency housing. At the end of this period the site will revert to providing tourist accommodation as has previously operated from the subject site.

The site is therefore assessed as being appropriate for the proposed activity having regard to the overall land use strategy in District Plan.

4.2.3 Permitted activity standards

The following table is an assessment of the proposal against the relevant permitted activity standards in the Commercial 3 Zone. We note that the bulk and location standards are not relevant as no physical changes to the existing buildings are proposed.

Commercial 3 Zone Performance Standards

Performance Standard	Description	Comments	Compliance
COMZ – S1 Maximum height and daylight envelope	No building or structure shall exceed 12 metres and buildings within 10 metres of a residential zone shall not transgress the daylight envelope.	The proposal does not involve changes to the bulk of the existing buildings.	No change proposed.
COMZ – S4 Minimum net floor area	The minimum net floor area for a household unit shall be 70m ²	The proposal will retain all 39 hotel units. No changes are proposed to the layout or configuration of the existing units within the site.	No change proposed.
COMZ – S5 Household unit design – new buildings	Outdoor living space Storage General amenity – heating and ventilation	The proposal does not involve the development of new buildings.	N/A
COMZ – S6 Parking, Access and Turning	No on-site parking and turning required. All vehicle crossings into local roads shall be provided and constructed to the standard of Rotorua District Council.	All carparks are existing. No new vehicle crossings are proposed.	No change proposed. No change proposed.
COMZ – S7 Glazing	No less than 50% of the building façade located within 5 metres of the front boundary shall be transparent glass.	The proposal does not involve changes to the bulk of the existing buildings.	No change proposed.

COMZ – S8 Verandahs	(a-h) various provisions relating to verandahs.	The proposal does not involve changes to the bulk of the existing buildings.	No change proposed.
COMZ – S9 Landscaping	<p>a. i. The boundary adjoining a residential zone shall be fenced with a 1.8 metre close-boarded fence; or</p> <p>ii. A two metre planting strip</p> <p>b. No more than 20% of required landscaping may be used for carparking</p> <p>c. Pallets, contains etc shall be screened from public places and residential areas</p>	<p>The site does not adjoin a residential zone.</p> <p>Landscaped land is not utilised for carparking.</p> <p>It is anticipated that no storage of goods etc will be required. In the case storage is required, goods etc will be located so as not to be visible from a public place or appropriately screened.</p>	<p>N/A</p> <p>No change.</p> <p>Complies.</p>
General District Wide Matters – Part 2			
LIGHT S1	No more than 10 lux on any residential site boundary.	No changes are proposed to the existing lighting on the site.	No change.
NOISE S1 (Commercial 3 Zone)	<p>Noise standards are measured from the boundary within the receiving site.</p> <p>Commercial 3 Noise performance standards apply to the boundaries of the site.</p>	The Site Management Plan includes measures to ensure noise will be managed within the site. The activity will continue to achieve compliance with the noise requirements of the District Plan.	Complies.

<p>NOISE R-5</p> <p>Acoustic treatment for residential accommodation and noise sensitive activities</p>	<p>New noise sensitive activities in the Commercial 4 Zone must be designed to meet the noise requirements of NOISE-S6:</p> <ul style="list-style-type: none"> • Bedrooms 10 p.m. to 7 a.m. on any day: <ul style="list-style-type: none"> - 35 dB LAeq(1h) - 45 dB Leq at 63 Hz - 40 dB Leq at 125 Hz • All other habitable rooms (all times) and in bedrooms 7 a.m. to 10 p.m. on any day: <ul style="list-style-type: none"> - 40 dB LAeq(1h) - 50 dB Leq at 63 Hz - 45 dB Leq at 125 Hz 	<p>No changes are proposed to the existing noise insulation within the existing units. This standard applies to both noise sensitive activities and residential activities. The proposal is not introducing a <i>new</i> noise sensitive activity to the site. Existing use rights apply.</p> <p style="text-align: right;">No change.</p>
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Relevant District Plan definitions:

‘Community housing’ is provided for in the Commercial 3 Zone as a **Discretionary Activity**. Community housing is defined in the District Plan as:

“a place of residence for a maximum of eight persons (i.e. all residents including resident staff) where some element of care or support is provided for residents. The definition includes emergency housing, (including temporary overnight accommodation) and rehabilitation centres, but excludes facilities where the movement of residents is legally restricted.”

The proposal is for a maximum of 117 people (excluding staff and support service workers) and as such does not meet this District Plan definition of ‘Community Housing’.

‘Household units’ are provided for in the Commercial 3 Zone as a **Permitted Activity** when they are not located on the ground floor. ‘Household unit’ is defined as:

“any building, part of a building or vehicle, whether temporary or permanent, that is occupied as a residence, including any structure or outdoor living area that is accessory to and used wholly or principally for the purposes of the residence.”

The units in the subject site, while not located on the ground floor of the building, do not meet the minimum floor area of a household unit (requiring a minimum net floor area of 70m² per household unit in COMZ3). Household units that do not meet the performance standards under COMZ-R32 are a restricted discretionary activity.

4.3 Activity status

As the proposal is not otherwise provided for in the District Plan, it must be considered as a **Non-Complying Activity** pursuant to Rule COMZ-R1 which provides for activities not expressly stated in the Rules for Activities in the Commercial Zone table.

4.4 Overview of the nature of the non-complying activity and whether it is “anticipated” by the District Plan

While it is acknowledged that the activity must be considered as a non-complying activity, it is our opinion that this activity status does not reflect the extent to which the District Plan provisions enable similar activities under the Commercial zone that applies to the site.

In addition to Community Housing, the District Plan makes specific provision for:

- *Household units* in COMZ3 as a permitted activity (above the ground floor);
- *Community facilities* in COMZ3 as a discretionary activity.

The proposed Contracted Emergency Housing has characteristics that align closely with the above activities, being the use of an existing hotel’s units as household units; albeit on a temporary basis and with supervision and some support services. Arguably, the use of the site for Contracted Emergency Housing is more aligned to the COMZ3 provisions than the long standing use of the site for hotel purposes.

The support activities that will be provided as an accessory use to the Contracted Emergency Housing i.e. on site management and bespoke support services for residents, are technically non-complying activities as in the Commercial 3 Zone the proposal is not otherwise provided for in the District Plan. However, it is noted that some of the services provided could be similar to those provided through a medical centre, which is a controlled activity in the COMZ3 zone. Daycare centres are also a controlled activity in the COMZ3 zone. As such, the activity on the subject site, with support services on the ground floor and accommodation provided above is aligned to the overall intent of the COMZ3 zone. If the support activities were not provided on site, the application could otherwise be assessed and determined as a restricted discretionary activity.

Therefore, regardless of whether the proposed use is considered as “community housing” or “household units with accessory support services” the application remains a non-complying activity.

As demonstrated above, despite being classified as a non-complying activity, emergency housing is not fundamentally out of step with the activities anticipated by the District Plan, with the non-compliant aspects being of minor significance and impact.

4.5 Scope of application

This application seeks resource consent under the Rotorua District Plan in order to establish all aspects of the proposal associated with using the existing site and buildings for emergency housing, including the associated support services. All necessary approvals are also sought to enable the eventual transition back to the prior hotel use.

If Council is of the view that resource consent is required for alternative or additional matters to those identified in Section 4.3 of this report, it has the discretion to grant consent to those matters as well as, or in lieu of those identified in this AEE.

Additionally, if Council is of the view that the activity status of any of the matters requiring consent is different to that described in Section 4.4 of this report, Council has the ability under Section 104(5) of the Act to process the application, regardless of the type of activity that the application was expressed to be for.

5. Assessment of environmental effects

In accordance with section 88(2)(b) of the Act and Clause 1(d) of Schedule 4 to the Act, this assessment of environmental effects of the proposed activity has been prepared in such detail as corresponds with the scale and significance of the effects that it may have on the environment.

5.1 Permitted baseline

In forming the opinion for the purposes of s95 and s104(1)(a), adverse effects on the environment can be disregarded if the District Plan permits an activity with that effect.

The District Plan provides for 'household units' as a permitted activity in the Commercial 3 zone, subject to meeting performance standards such as in relation to height (12 metres), household unit density (minimum net floor area of 70m²) and household unit design. As such the existing buildings on site could be redeveloped to residential household units (with commercial businesses such as takeaway food premises, convenience retail or small supermarket on the ground floor) as a permitted activity. It is noted that there is no limit on the number of units that can be provided on the site as there is no density standard for the COMZ3 zone. The only control in this regard is in relation to the minimum net floor area of 70m².

In undertaking the effects assessment below, reference has been made and actual and potential effects of a permitted residential development of the site. It is noted that this development would include upper level decks and could be three stories in height, and of a similar design to the existing buildings on the subject site.

5.1.1 Effects that can be disregarded under the permitted baseline

The purpose of the permitted baseline test is to isolate and make effects of activities on the environment that are permitted by the plan irrelevant. When applying the permitted baseline such effects cannot then be taken into account when assessing the effects of a resource consent. While applying a permitted baseline is at the discretion of the decision maker, in our view it is entirely appropriate to apply a permitted baseline to the subject application as the plan clearly provides for activities on the subject site that have very similar effects to the subject application.

The permitted activities described above have the potential to generate adverse effects associated with noise, amenity, density, and traffic generation of a type and scale similar to that of the effects associated with the proposed activity for Contracted Emergency Housing. It is noted that there are no parking or on-site turning requirements in the Commercial 3 zone, and as such commercial businesses such as permitted convenience retail or a supermarket could operate from the site without providing any on-

site parking and as such would likely put pressure on the on-street parking in the area.

As the District Plan permits household units above the first floor with commercial businesses on the ground floor, effects from such activities can be disregarded.

5.2 Character and amenity effects

The subject site is located within an area that contains a mix of commercial activity, residential and vacant land. The site has two road frontages, Froude Street to the north and Tryon Street to its east.

The adjoining property to the west is vacant and other surrounding properties include commercial (including the Holiday Inn across the road to the east) and residential land uses. The site is well located to amenities, including being within approximately 180 metres of a nearby service station and geothermal reserve on Froude Street.

The design, scale, appearance and layout of the existing buildings within the subject site will not change. There will be no change to the physical features of the site more generally. The site layout and allocation of onsite features is shown in the site plan at [Appendix 2](#). We have also included the building plans in [Appendix 2](#) to help with the understanding of the site layout.

Character and amenity effects relate to both the amenity effects internal to the site for occupants as well external amenity effects on neighbouring properties. These potential effects are discussed below.

5.2.1 Internal amenity effects

Occupants of emergency housing generally have similar needs to motel/hotel guests and, as such, the conversion of the site from a hotel activity to an emergency housing activity is a relatively straightforward exercise. The key difference between hotel guests and emergency housing residents is that in some cases, emergency housing occupants will be on site for several weeks, whereas a hotel guest would rarely stay that long.

There are several facilities on site for the use by occupants. This includes the pool area and surrounding shared open space in an enclosed courtyard. There is also a lounge, games room and conference room available for occupant use. While the layout of each unit is different, most have access to a private covered deck area. There is adequate room throughout the site for parking, noting that parking will ultimately be a matter for the contracted site management to direct and control.

The Commercial Zone objectives and policies do not include direction about on-site residential amenity, even though the Zone provides for several forms of residential use. The rules include a specific outdoor living space requirement, but this is only for “new builds”. In the Commercial 3 Zone description, there is no reference to residential amenity outcomes.

Ultimately, potential internal amenity effects are mitigated by the intended short duration of stay. In this regard emergency housing provides short-term accommodation to individuals and whānau with a high housing need, while more permanent accommodation is sought. The need of tenants for accommodation far outweighs the qualitative requirements of the District Plan for onsite amenity. Furthermore, there are many local and urban amenities within close proximity of the subject site.

The proposal includes targeted support services for whānau on an “as required” basis. In addition to this, effective site management will ensure amenity for tenants is

maximised during their stay by managing noise and other potential nuisance factors. These measures will collectively assist in providing an improved quality of life for tenants during their stay, when compared with the alternative scenario of homelessness or overcrowding in unsuitable accommodation.

Ultimately, the provision of Contracted Emergency Housing through hotels / motels provides a necessary option for vulnerable individuals and families who urgently require accommodation. While there will be some limitations with regard to on-site amenity, the site facilities are considered to be adequate for the intended duration of stay. Effects in relation to internal amenity are less than minor on the environment, and no parties will be adversely affected.

5.2.2 External amenity effects

Potential external amenity effects are discussed on a site-by-site basis below. As with any residential activity, general noise may be associated with emergency housing being located on the subject site, however, this will be dispersed throughout the site and will be domestic in nature. Overall, it is expected that any noise that is generated from the proposed use of the site will not exceed the permitted noise levels for this environment, nor is it expected to be any greater than the noise generated from the current use of the site as a hotel.

To provide assurance around the management of potential noise etc associated with the proposed activity, the implementation of the SMP will effectively ensure noise and outdoor activities within the site are adequately managed. The implementation of the SMP will result in a more restrictive and supervised environment (insofar as managing potential noise and nuisance effects) than would otherwise exist if the subject site were continuing to operate as a hotel.

10 Tryon Street (across Tryon Street to the east)



Figure 3: Image of 10 Tryon Street to the east of the subject site (Source: google Street View).

The Holiday Inn at 10 Tryon Street is directly east of the site (across the Tryon Street). Its entrances are located on Froude Street with exit to Tryon Street. Carparking is located to the northern end of the site directly opposite the subject site, with rooms located at the southern end of the site. Furthermore, the design of the buildings on the subject site are such that pedestrian circulation spaces and entrances to the units are internal to the subject site and screened by the existing layout of buildings on the subject site.

We note that 10 Tryon Street is located in the Commercial 4 zone, where ‘tourist accommodation’ is a permitted activity.

Effects on the property across the road at 10 Tryon Street are comparable to the existing tourist accommodation activity operating from the subject site or to a permitted activity operating from the subject site and are considered to be less than minor.

9 Tryon Street & 12 Meade Street (south)



Figure 4: Image of the subject site (right) and the adjoining property to the south at 9 Tryon Street (Source: google Street View).

The directly adjoining properties to the south of the subject site are 9 Tryon Street, being an art gallery, and 12 Meade Street, a residential dwelling. Both are located in the Commercial 3 Zone of the District Plan.

The property at 9 Tryon Street includes a single commercial building screened from the subject site by a wooden fence and vegetation on the boundary. The property at 12 Meade Street includes a single residential dwelling located on the western boundary and ancillary buildings to the driveway. It is noted that the property at 12 Meade Street is located at the top of a large crib retaining wall, elevating it from the subject site and helping to mitigate potential adverse residential amenity effects on 12 Meade Street.

The relationship between the subject site and the adjoining sites to the south is such that the subject site’s carparking area is adjacent to the southern boundary. Further, the buildings on the subject site are designed with open space areas within the internal courtyard, screened from the neighbouring properties to the south.

Effects on the adjacent site at 9 Tryon Street and 12 Meade Street are comparable to the existing tourist accommodation activity operating from the subject site or a redevelopment of the site to contain residential household units above the first floor and a permitted commercial activity on the ground floor. Effects are considered to be less than minor, and no parties are adversely affected.

9 Froude Street and 10 Meade Street



Figure 5: Image of the retaining wall and boundary fence from the subject site towards the adjoining properties of 9 Froude Street (Source: google Street View).

The adjoining sites to the west at 9 Froude Street and 10 Meade Street are currently vacant. These properties sit above the subject site, and we note that the subject site's carpark, western units, and shared spaces adjoin this boundary. These areas are screened from 9 Froude Street and 10 Meade Street by a retaining wall and existing wooden boundary fence. Any potential effects on 9 Froude Street and 10 Meade Street are comparable to the continued operation of the existing hotel or a redevelopment of the site to contain residential household units above the first floor and a commercial activity on the ground floor. Effects on these properties are less than minor.

14, 16 & 16A Froude Street



Figure 6: Image of 14, 16 & 16A Froude Street to the north of the subject site (Source: google Street View).

The properties at 14, 16 and 16A Froude Street are located to the north of the subject site across Froude Street. They contain standalone residential dwellings at the southern end of the sites with right of way access to the dwellings at the northern end.

There is approximately 30 metres separation between the boundaries of the sites at 14, 16 and 16A Froude Street and the subject site.

The subject site's layout is such that a fence provides privacy from the internal open space area, and the units on the northern boundary are typically east and west facing rather than north facing.

Effects on the adjacent sites at 14, 16 and 16A Froude Street are comparable to the existing tourist accommodation activity operating from the subject site or a redevelopment of the site to contain residential household units above the first floor and a commercial activity on the ground floor. Effects on these properties are less than minor.

All other surrounding properties

No other properties directly adjoin the subject site. All other surrounding properties are sufficiently separated from the proposed use of the site for emergency housing. The effects of the proposal are entirely comparable to the continued operation of the existing hotel, or the permitted baseline scenario discussed in Section 5.1 of this application above. Effects on all other surrounding properties are less than minor and no parties will be adversely affected.

5.3 Streetscape / neighbourhood character

The proposal is to retain the existing buildings and site features as such effects from a streetscape / neighbourhood character and visual point of view are similar to the continued operation of the existing hotel. Tryon Street is approximately 30 metres in width with a median strip, and angled parking and footpaths on both sides. Froude Street is also approximately 30 metres in width with a footpath and 6.5 metre grassed kerb on either side. The internal area of the subject site is well screened by the external façade. The nature of emergency housing of the scale on the subject site is that it will present in a very similar way to the operation of the site as a hotel.



Figure 7: 7 Tryon Street streetscape (source: Google Street View)

Effects in relation to streetscape and neighbourhood character are less than minor on the environment, and no parties will be adversely affected.

5.4 Access and parking effects

The subject site has its existing vehicle entrance and exit onto Tryon Street where there is good visibility to the east and west. The existing carparking arrangement within the site will remain and there is sufficient carparking to meet the demand from Contracted Emergency Housing occupants. Similar to how a hotel would operate, no specific visitor parking is provided.

The District Plan was recently updated as directed by the National Policy Statement on Urban Development (NPSUD) whereby the requirement for each household unit to provide a carpark was changed from requiring 1 carpark to requiring 0 carparks.

The proposal is not expected to generate strong demand for on-street carparking, and any potential parking and vehicle access effects are comparable to a permitted activity occurring within the site. The site is well placed for proximity to public transport and within walking distance of local amenities.

Access and parking effects are less than minor on the environment, with no parties being adversely affected.

5.5 Traffic generation

The proposed capacity of the site will be similar to the maximum occupancy of the existing hotel. The nature of traffic generation may alter with the changed accommodation use, although the effects are not considered to be any greater than what currently exists under the existing environment. Residents are more likely to stay on site during the day or go to or from the site for work purposes, compared with tourists who may travel in and out several times a day, and checking in and out at different times. Visitors to the site are managed by the on-site Housing Service Provider (see Section 2.6 of the SMP in [Appendix 4](#)).

Traffic generation effects are assessed as less than minor, having regard to the existing environment, with no parties being adversely affected.

5.6 Waste management

On-site waste management will be addressed by the hotel operator. The District Plan does not identify on site waste management as a resource management issue. Instead, this issue is addressed under the Council's Solid Waste Bylaw 2016. The bylaw provides a means to mitigate potential adverse waste management effects including access, and minimising noise and odour and vermin. The hotel operator's obligations under this bylaw will be addressed and dealt with separately from the resource consent.

We note there are dedicated areas for storage of rubbish and management of these areas is the responsibility of the hotel operator.

Effects in relation to waste management will be less than minor on the environment, and no parties will be adversely affected.

5.7 Intensity of use effects

The existing capacity for accommodation (i.e. number of units and associated beds etc) will continue to be available at a broadly similar level to the previous hotel operation. HUD has prohibited the use of temporary beds, such as sofas or roll away beds, and as such the capacity

(i.e. people per unit) may have actually decreased since the hotel has been used for Contracted Emergency Housing. The site has 39 accommodation units and all of these are available for Contracted Emergency Housing.

While the existing capacity to provide accommodation is similar to the previous hotel operation, the total number of people on the site is generally far less than the maximum possible capacity outlined in Table 1 above. This is because not every bed in every unit is used or fully occupied i.e. a double bed may only have one person sleeping in it.

For example, as shown in *Table 4* below, for the week beginning 13 December 2021, all of the available rooms were occupied (i.e. 39 rooms). However, the total number of people staying on the site was 56 people. This includes any children under the age of 18 months. While the number of people staying onsite depends on the needs of different whānau and can change over time, it is not expected that the site will ever operate at its total maximum capacity i.e. all beds across the entire site being occupied to their maximum capacity.

TABLE 4: Occupancy levels for the week beginning 13/12/21

Hotel	Number of rooms contracted	Number of rooms in use for accommodation	Possible total number of people at maximum capacity	Actual number of people in CEH in week beginning 13/12/21
7 Tryon Street	39	39	117	56

No changes are proposed to the onsite reticulated servicing arrangement and there is no subdivision of land or units proposed as part of this proposal. Overall, there will be no change in the intensity of use, such as 3 waters infrastructure, traffic, parking and noise. Any potential adverse effects arising from this proposal in relation to intensity of use will be negligible.

5.8 Cumulative effects

A total of 13 motels (including one hotel) have been contracted by HUD for emergency housing in Rotorua. This reflects the immediate need for such housing within the district. Contracted Emergency Housing is considered to have very similar potential adverse effects to a motel / hotel operating for the general public. One of the key differences being that each site is supported with on-site management and supervision, and support services are provided to assist the occupiers in obtaining more sustainable housing options. This will serve to minimise any adverse effects of the proposal further.

The site will be used for Contracted Emergency Housing for a limited period (a maximum of five years). The on-site use will transition back to the previous hotel use as the need for emergency housing subsides. When considered in the context of the onsite activities being closely managed and supervised, coupled with the somewhat temporary nature of the intended use, cumulative effects are considered to be less than minor on the environment, with no parties being adversely affected.

5.9 Positive effects

The purpose of this application is to provide community members, who have an urgent need for housing, access to emergency residential accommodation. The existing hotel and its facilities are well suited to provide for emergency housing. The proposed on-site social wrap-around services will assist with the

daily functioning of the site and will help provide a pathway for tenants to obtain more permanent housing elsewhere.

This proposal does not intend to alter the existing buildings on the site, rather to re-purpose the existing units on an interim basis to provide a similar type of accommodation than currently exists for the people who need it most. The proposed use of the existing hotel facilities for emergency housing will be an efficient use of an existing site and facilities. The proposal retains the existing qualities of the surrounding environment.

The site is extremely well located to wider amenities such as public open space, public transport, and neighbourhood service amenities.

The use of the site for Contracted Emergency Housing, provides the hotel operator with a source of steady income in a period when international tourism is significantly reduced as a result of the COVID-19 pandemic. Once the need for emergency accommodation dissipates, the site and buildings will revert to provision of tourism accommodation – consistent with the onsite activities since the 1970s.

For these reasons, and those noted earlier within this assessment, the proposal has significant positive effects that should be taken into consideration by the Council when determining this application.

5.10 Conclusion

The proposed use of the site and buildings for Contracted Emergency Housing, is consistent with effects of the existing hotel operation and will have little to no external impact. In the case of the subject application, the hotel operator has made a conscious business decision to operate Contracted Emergency Housing on the site where there is a guaranteed income rather than providing more traditional ‘tourist accommodation’ in a post COVID environment.

6. Objectives and policies

6.1 Objectives and policies

The following objectives and policies of the Rotorua District Plan are relevant to this proposal.

Table 5: Assessment against District Plan objectives and policies

Part 2: District Wide Matters – Noise	
Appropriate noise environment	
NOISE-O1	A noise environment consistent with the character and amenity expected for the zone.
NOISE-P1	Control the potential adverse effects of noise on noise sensitive activities including by setting appropriate standards that reflect the function of the zones and permitted activities within them.

NOISE-P3	Control the potential adverse effects of noise generated in one zone and received in another zone.
NOISE-P4	Minimise, where practicable, noise at its source or on the site from which it is generated to mitigate adverse effects on adjacent sites.
Comment:	<p><i>The proposed use of the site for emergency housing is entirely consistent with the noise environment expected for the Commercial 3 zone. Household units are permitted above the first floor level in the Commercial 3 zone and any noise generated from the site is akin to the type of noise generated from this type of activity.</i></p> <p><i>Furthermore, there is far more active supervision of the site though the service provider than would exist if the site was being operated as a hotel. Effective implementation of the SMP (which includes restrictions on visitors, hours for being in shared open spaces and specific rules related to noise) provides further assurance that any noise issues will be dealt with promptly.</i></p> <p><i>The proposal is consistent with the above objective and policies.</i></p>
Reverse Sensitivity	
NOISE-O2	Existing and permitted activities in the central city, rural and industrial zones are protected from noise reverse sensitivity
NOISE-P7	Encourage activities to locate in areas where the noise generated from existing activities, or noise anticipated by the zone rules, is compatible with the proposed activity.
NOISE-P8	Avoid, remedy or mitigate adverse effects generated by central city, industrial, infrastructural and rural activities through appropriate zone buffering, landscaped buffers, building location and/or noise control boundaries to maintain the amenity of adjacent residential zones or marae and habitable buildings.
NOISE-P9	Mitigate adverse effects generated by central city and infrastructural activities through the requirement that new noise sensitive activities that locate within the Central City or close to major infrastructure are appropriately insulated.
NOISE-P10	Limit the location of new residential activities sensitive to disturbance from lawfully established urban and rural industries, recreation and infrastructure activities and network utilities to avoid reverse sensitivity effects.
Comment:	<i>The proposal is not anticipated to result in any reverse sensitivity effects. The zoning of the site provides for very similar activities (household</i>

accommodation) and the proposed use of the site is compatible with surrounding uses.

The proposal is consistent with the above objective and policies.

Part 3: Area Specific Matters – Commercial Zones (COMZ)

Commercial centres

COMZ-O1 **A hierarchy of vibrant compact commercial and tourism centres that efficiently service and support the needs of the surrounding community and nationally significant tourism sector.**

COMZ-P3 Neighbourhood Centres provide for small neighbourhood centres within easy walking distance that support the day to day needs of the surrounding residential areas.

Comment: *The subject site is located within the ‘COMZ3 – Neighbourhood Centres’ zone. The current configuration of buildings on the site reflects the neighbourhood centres zone, which accommodation units being located above the ground floor. However, there are no shops or clusters of convenience stores proposed as part of this application.*

The proposal is to use the existing site and buildings for a relatively short period of time (maximum of five years) and will not compromise the ability for the site to be redeveloped into a site that provides day to day services to surrounding residential communities in the future.

The provision of Contracted Emergency Housing is supporting the day to day needs of the surrounding community as it is providing vulnerable people with a safe and secure place to live while more permanent housing is sourced. It is noted that medical centres, which could provide similar support services to some of those provided onsite, are a controlled activity in the COMZ3 zone and that these could occur on the ground floor of the existing buildings on the site.

While the proposal does not amenities such as neighbourhood shops it does help to achieve the broader objective outlined under COMZ-01 by supporting the needs of the surrounding community.

The proposal is generally consistent with and not contrary to the above objective and policy.

Design and appearance of buildings

COMZ-O2 **Commercial activities that do not adversely affect the character, safety and efficiency of commercial areas.**

COMZ-P6	Manage the design of activities within commercial centres to maintain or enhance the character, public safety and efficient functioning of the transport network.
Comment:	<p><i>The proposal will operate much like a hotel with longer term visitors.</i></p> <p><i>As discussed in the assessment of environmental effects (above) the proposal will not detract from the character of the area, nor will it adversely affect the safe and efficient functioning of the transport network.</i></p> <p><i>The Housing Service Provider will provide effective management of the site, ensuring the safety of those within the site and the wider community.</i></p> <p><i>The proposal is consistent with the above objective and policy.</i></p>
COMZ-O3	Commercial buildings and activities designed and operated in a manner that avoids adverse effects on the amenity of residential zones.
COMZ-P7	Manage the effects and design of activities to ensure that the amenity of adjoining residential properties is not adversely affected.
Comment:	<p><i>The layout of the site and buildings will not be altered as part of the proposal. The implementation of the SMP will ensure the use of the site for Contracted Emergency Housing purposes will not adversely affect the amenity of adjoining residents.</i></p> <p><i>Furthermore, the Commercial 3 zone anticipates residential properties within proximity of the established activities within this zone. The proposal is consistent with the above objective and policy.</i></p>
Commercial activities located within non-commercial zones	
COMZ-O4	Efficient use and development of commercial centres by the establishment of activities consistent with the intended purpose of each zone.
COMZ-P8	Restrict the location of retail and commercial activities in other zones of the district to maintain and enhance the vibrancy and amenity of the commercial zones.
COMZ-P9	Provide diverse commercial centres that offer services and convenient retail activities that complement rather than compete with the city centre.
Comment:	<i>As previously discussed, the proposal is a Non-Complying Activity because it does not neatly fit the definitions in the District Plan, rather than because it is challenging the integrity of the District Plan. The establishment of household units above the ground floor is permitted in the COMZ3 zone and as such residential activity is anticipated in the zone.</i>

The proposal does not compete with the City Centre and complements the City as a whole, by providing urgently needed housing for those most in need.

The proposal is consistent with this objective and these policies.

Overall, the proposed is consistent with the above objective and policies of the District Plan.

6.2 Overall objectives and policies conclusion

For those reasons outlined above, it is considered that the proposal is consistent with all relevant objectives and policies of the operative Rotorua District Plan.

7. Notification assessment

7.1 Public notification – section 95A

The matters to be considered by the consent authority when deciding whether or not to publicly notify an application are set out in Section 95A of the RMA.

Step 1 – Mandatory Public Notification in certain circumstances (sections 95A (2) and (3):

Mandatory public notification is not required as the applicant does not request public notification [s95A(3)(a)], and the application has not been made jointly with an application to exchange recreation reserve land under section 15AA of the Reserves Act [s95A(3)(c)].

Step 2 – Preclusion to Public Notification:

Public notification is not precluded because the activity is not subject to any rule in the District Plan that precludes public notification [s95A(5)(a)] and the activity is not for a controlled activity [s95A(5)(b)(i)] or a boundary activity [s95A(5)(b)(iii)].

Step 3 - Public Notification – Rule/Adverse Effects:

Public notification is not required as the application does not include an activity that is subject to any rule in the District Plan or NES that requires public notification, and in accordance with section 95D adverse effects on the environment will not be more than minor [s95A(8)(a) and (b)].

Step 4 – Special circumstances:

There are no special circumstances that warrant public notification under section 95A(9) because none of the circumstances of the application are exceptional or unusual.

It is recognised that transitional and emergency housing is a controversial issue in Rotorua and other parts of New Zealand, with concerns about crime and violence, and risks to public safety. The RMA and District Plan do not provide scope to manage households based on people's circumstances, behaviour or socio-economic status. These issues are managed under other legislation and through agencies other than the council such as the Police and other government service providers. Public notification based on

these circumstances will likely serve to confuse the issues that are relevant to resource consent decision making.

It is acknowledged that this proposal forms part of a wider accommodation model whereby tourist accommodation within the central city is being temporarily repurposed for short-stay accommodation by government agencies and/or contracted housing service providers. However, it must also be recognised that this reflects the national and global context of the time – i.e. a period in which residential accommodation is in short supply, coupled with a global pandemic in which demand for tourist accommodation is significantly reduced, and a point in time when facilities are being used to assist in the government’s broader public health response to COVID-19. While this represents an unusual combination of parameters, if simply viewed in isolation and abandoning a sense of the wider context in which the application is being made, the actual effects resulting from the Contracted Emergency Housing activities that are the subject of this application are neither unusual or exceptional.

In addition, it should be noted that while resource consent is being sought for this activity in 13 locations within Rotorua, the number of premises being utilised for this purpose, or the number of people being housed across the 13 sites in this temporary manner, is not unusual in terms of a broader response to the nationwide housing crisis. Emergency/Transitional Housing is a necessary interim housing option provided throughout the country. The number of sites being contracted by HUD for this purpose and requiring resource consent in Rotorua (13) should not in and of itself be a determining factor for special circumstances, noting that many other city centres throughout New Zealand have sites operating for similar purposes in excess of these numbers.

The contracted nature of this accommodation by HUD in Rotorua is an agreed outcome from the Rotorua Housing Taskforce, which was established in 2021 to develop options for providing better support and outcomes for people living in emergency housing motels in Rotorua. In this regard, the Contracted Emergency Housing model is a positive one in which resulting effects on the community, and welfare of the occupants residing in these premises, is greatly enhanced.

Accordingly, it is considered that this application should be processed without public notification.

7.2 Limited notification – section 95B

Section 95B relates to limited notification of consent applications and (in summary) directs that, where notification of an application for resource consent is not required under Section 95A, the consent authority must give limited notification of the application to any affected person. Section 95B is also a four-step process to determine whether to limited notify an application.

Step 1 – Customary Rights and Marine Title Groups, and Statutory Acknowledgements:

There are no protected customary rights groups or customary marine title groups that will be affected by the proposal, and the proposal is not on, adjacent to, or likely to affect land subject to a statutory acknowledgement [s95B(2)(a) and (b) and s95B(3)].

Step 2 - Preclusions to Limited Notification:

There is no preclusion to limited notification as there is no rule in the District Plan that precludes limited notification of the application [s95B(6)(a)] and the application is not for neither a district land use

consent with controlled activity status which precludes limited notification [s95B(6)(b)].

Step 3 – Limited Notification – Affected Persons:

Limited notification is not required as the effects on any person will be less than minor [s95B(8)]. Refer to the assessment of effects and conclusions in section 5 of this report.

Step 4 – Special circumstances:

There are no special circumstances that exist relating to the application that warrant limited notification to any persons who have not been excluded as affected persons by the assessment above [s95B(10)]. There are no special circumstances that warrant limited notification under section 95B(10) because none of the circumstances of the application are exceptional or unusual.

Accordingly, it is considered that this application should be processed without limited notification.

7.3 Notification conclusion

Section 95 of the Act sets out the requirements for the Council to consider when determining whether an application for resource consent should be notified.

The assessment has found at Section 5 of this AEE that any effects on specific parties and the wider environment will be less than minor. Therefore, in accordance with the steps outlined above, notification of the proposal is not required.

8. Statutory assessment

8.1 Section 104D Assessment – Gateway Test

As the proposal is for a Non-Complying Activity the gateway test of section 104D must be fulfilled, namely that either the effects of the proposal are minor, or that the proposal is not contrary to the objectives and policies of the District Plan, before the application can be considered under to section 104B of the Act.

Under the Assessment of Adverse Effects section above, the effects of the proposal have been determined to be less than minor. Taking into account the further matters relevant under section 104 of the Act, the overall adverse effects of the proposal will be less than minor.

The objectives and policies of the District Plan that are relevant to the proposal have also been assessed above and the proposal is not contrary to these objectives and policies. Accordingly, the proposal passes through both of the limbs of the 'gateway test'. The Council is therefore able to determine the application by granting the consent.

8.2 Section 104 of the RMA

In considering an application for land use consent, the consent authority must have regard to Part 2 (Purposes and Principles) of the RMA, and to the matters to be considered as set out in section 104(1). Section 104(1) states that, subject to the provisions of Part 2, a consent authority must have regard to:

- (a) any actual and potential effects on the environment of allowing the activity; and
- (b) any relevant provisions of –
 - (i). a national environmental standard:
 - (ii). other regulations:
 - (iii). a national policy statement:
 - (iv). a New Zealand coastal policy statement:
 - (v). a regional policy statement or proposed regional policy statement:
 - (vi). a plan or proposed plan; and
- (c) any other matter the consent authority considers relevant and reasonably necessary to determine the application.

8.2.1 104(1)(a) – Effects

In respect of Section 104(1)(a), an assessment of any actual or potential effects is included in Section 5 of this report. Ultimately, it is concluded that the resulting effects will be less than minor and acceptable.

8.2.2 104(1)(b) – Relevant planning provisions

I have considered the higher order planning documents specified at section 104(1)(b)(i) – (vi) of the Act. In particular, it is my opinion that there are no National Environmental Standards that are directly relevant to the consideration of this proposal. Similarly, the New Zealand Coastal Policy Statement is not relevant. The proposal is consistent with the general strategic direction and objectives and policies of the BOP Regional Policy Statement. Regard has also been given to *He Mahere Taiao mo ngā Wai o The Arawa – The Arawa Lakes Trust Environmental Management Plan (2019)*. There are no potential adverse effects directly pertaining to Lake Rotorua or its waterways as a result of this proposal.

The National Policy Statement on Urban Development 2020 (NPSUD) is relevant to this proposal. The NPSUD is about ensuring urban development recognising the national significance of urban environments and the need to enable such environments to develop and change, and to provide sufficient development capacity to meet the needs of people and communities and future generations in urban environments. The NPSUD directs decision making under the Act to ensure that planning decisions enable development through providing sufficient development capacity for housing and business.

The relevant NPSUD Objectives and Policies are set out below.

Objective 1: *New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.*

Objective 4: *New Zealand’s urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.*

Policy 1: *Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:*

- (a) *have or enable a variety of homes that:*
 - (i) *meet the needs, in terms of type, price, and location, of different households; and*
 - (ii) *enable Māori to express their cultural traditions and norms; and*
- (b) *have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and*
- (c) *have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and*
- (d) *support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and*
- (e) *support reductions in greenhouse gas emissions; and*
- (f) *are resilient to the likely current and future effects of climate change.*

Policy 6: *When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:*

- (a) *the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement*
- (b) *that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:*
 - (i) *may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and*
 - (ii) *are not, of themselves, an adverse effect*
- (c) *the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)*
- (d) *any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity*
- (e) *the likely current and future effects of climate change.*

Policy 11: *In relation to car parking:*

- *the district plans of tier 1, 2, and 3 territorial authorities do not set minimum car parking rate requirements, other than for accessible car parks; and*
- *tier 1, 2, and 3 local authorities are strongly encouraged to manage effects associated with the supply and demand of car parking through comprehensive parking management plans.*

The subject application is to enable those with urgent housing needs to have safe and stable accommodation while a more permanent housing solution can be found. The Contracted Emergency Housing model supports families and individuals in urgent housing need with a short-term place to live and provides support to find stable and more permanent housing. In relation to parking, the NPSUD requires that District Plans do not set minimum car parking rates. As directed by the NPSUD, the requirement to provide 1 carpark per household unit has now been removed from the District Plan.

The proposal has been assessed against the relevant policies of the NPSUD and directly contributes to achieving the outcome sought by the NPSUD. There are no other National Policy Statements relevant to the assessment of this proposal.

In respect of Section 104(1)(b), the document that provides the relevant statutory context is the Rotorua District Plan. As discussed at Section 6 above, the proposal is generally consistent with the relevant objectives and policies of the District Plan.

8.2.3 104(1)(c) - Other Matters

Waste Management

The District Plan does not identify on site waste management as a resource management issue. This is addressed under the Council's Solid Waste Bylaw 2016. The bylaw provides a means to mitigate potential adverse waste management effects including access, and minimising noise and odour and vermin. It is acknowledged that this resource consent does not obviate the consent holder's obligations under the bylaw.

Rotorua Spatial Plan

The Rotorua Spatial Plan 2018 has seven objectives, the most relevant to this application is "Objective One: Build Homes that match needs", this is to respond to the fact that current market trends indicate that there are not enough new homes are being built for the number of additional people living in the district. As part of Objective One the Council has identified that must be used "more efficiently and create a variety of housing types". The Spatial Plan indicates that there will be a future plan change to "Consolidate tourism accommodation in the CBD and allowing existing accommodation to change to land for homes".

We also note that in relation to infrastructure (Objective Seven), the subject site falls within an area where there is 'Capacity for growth'.

The proposed interim use of the hotel site for emergency housing is consistent with this Spatial Plan strategic direction and provides an urgent solution while longer term solutions, such as plan changes to provide additional land for housing and physical construction of additional housing are undertaken.

H Papakāinga, He Hāpori Taurikura – A Strategy for Homes and Thriving Communities

The Rotorua Spatial Plan 2018 has seven objectives, the most relevant to this application is "Objective One: Build Homes that match needs", this is to respond to the fact that current market trends indicate that there are not enough new homes are being built for the number of additional people living in the district. As part of Objective One the Council has identified that must be used "more efficiently and create a variety of housing types". The Spatial Plan indicates that there will be a future plan change to "Consolidate tourism accommodation in the CBD and allowing existing accommodation to change to land for homes".

We also note that in relation to infrastructure (Objective Seven), the subject site falls within an area where there is 'Capacity for growth'.

The proposed interim use of the hotel sites for emergency housing is consistent with this Spatial Plan strategic direction and provides an urgent solution while longer term solutions, such as plan changes to provide additional land for housing and physical construction of additional housing are undertaken.

He Papakāinga, He Hāpori Taurikura - A Strategy for Homes and Thriving Communities

The proposal will directly contribute to the objectives of “*He Papakāinga, He Hāpori Taurikura - A Strategy for Homes and Thriving Communities*” (Rotorua Housing Strategy). The Rotorua Housing Strategy was publicly consulted on in June – August 2020 and was adopted by Council in October 2020. One of the objectives of the Strategy is for:

“Safe emergency housing options that meet differing needs are available for short-term use.”

The Rotorua Housing Strategy identifies that there is an “urgent priority” at the lower end of the housing continuum (see Figure 8 below). The proposal in the subject application will increase the supply of emergency housing in Rotorua while the wrap around support services will help occupants and neighbours to feel safe and will deliver targeted support to occupants.



Figure 8: Housing Continuum (excerpt from the Rotorua Housing Strategy 2020, page 20).

There are no other matters that the consent authority should consider in the determination of this application.

8.3 Section 108 of the RMA

Section 108 of the RMA provides for the Council to grant consent on any condition the Council considers appropriate. In accordance with Clause 6(1)(e) of Schedule 4 of the RMA, as part of proposed mitigation of the potential adverse effects of the proposal, this application includes the following suggested conditions. As part of the pro-offered conditions, the applicant is willing to accept a review condition so as to provide additional assurance to the Council as to the effective operation of the site for emergency housing.

Scale and Intensity

- 1) A maximum of 117 residents (excluding children under 18 months of age and staff) shall be permitted to reside within the 39 emergency housing units.
- 2) A record shall be maintained that states occupancy numbers at any given date within emergency housing units and this information shall be made available to the Council upon request.
- 3) To avoid doubt, this resource consent does not:

- a) Restrict the length of stay for residents in the emergency housing units.
- b) Limit the number of people residing in the Manager's Accommodation.

On-site management

- 4) An on-site staffing presence shall be maintained on the site for the duration of the consent.
- 5) The Contracted Emergency Housing accommodation must operate in accordance with the Site Management Plan submitted with the resource consent application.

Review Condition

- 6) Council may, within 36 months of this consent being given effect, initiate a review of the conditions of the consent under section 128 of the RMA 1991 to:
 - a) Assess the adequacy of, and if necessary, changes to the conditions controlling activities on the site; and
 - b) Deal with any significant adverse effects on the environment that may arise from the exercise of the consent (limited to noise, site management, the use of common/shared areas, parking and waste management)
 - c) Initiate a review of conditions that may allow for new conditions to be applied to the consent.

8.4 Resource Management Act 1991 – Part 2 Assessment

I have had regard to matters under Part 2 of the RMA when preparing this resource consent application. The Rotorua District Plan is a valid planning document. In achieving the purpose of the Act (Section 5) all persons exercising functions under it, shall recognise and provide for matters of national importance (Section 6), have particular regard to any other relevant matters (Section 7), and take into account the principles of the Treaty of Waitangi (Section 8).

The majority of the District Plan provisions relevant to the subject application were made operative in 2016 (five years ago). Since that time, the context in Rotorua, and across most of New Zealand, particularly in relation to housing and the demand for social housing has changed.

The NPSUD came into force on 20 August 2020 and seeks to ensure that new development capacity is enabled by councils of a form and in locations that meet the diverse needs of communities. The District Plan does not yet reflect the NPSUD, a key tool in increasing the supply of housing in New Zealand. As such it is even more important to consider the broader housing context within which the proposal for Contracted Emergency Housing sits (rather than just the District Plan provisions alone). The proposal is at the lower end of the housing continuum, but nevertheless provides a short term housing solution and enables vulnerable people of the Rotorua community a pathway to more secure and permanent housing.

Part 2 of the Act sets out the purpose and principles of the legislation, which as stated in section 5, is “to promote the sustainable management of natural and physical resources”. Section 5 goes on to state that sustainable management should enable “people and communities to provide for their social,

economic and cultural wellbeing and for their health and safety while (amongst other things) avoiding, remedying or mitigating any adverse effects of activities on the environment”.

The proposal seeks to ensure vulnerable communities have access to safe and secure housing, a fundamental human need. Clearly providing accommodation to those communities that would otherwise be homeless or living in overcrowded or unacceptable housing is fundamental to wellbeing (and therefore contributes to achieving section 5 of the Act). The proposal aligns with Part 2 of the Act.

For the reasons outlined in this report, I consider that consent should be granted when the proposal is assessed against the matters in section 104(1)(a) to 104(1)(c) of the Act.

9. Conclusion

This application is being made on behalf of the hotel operator by Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development for resource consent from Rotorua District Council for Contracted Emergency Housing at 7 Tryon Street, Rotorua.

Section 5 details an assessment of effects and Section 7 outlines the key planning considerations for this assessment. These assessments conclude that there are less than minor effects and no persons will be adversely affected. The effects are accordingly considered to be acceptable. The proposal is also broadly consistent with the objectives and policies of the District Plan.

On this basis, it is considered that consent can be granted on a non-notified basis in accordance with Sections 104 and 104B of the Act.

As part of the application, the applicant has offered conditions of consent that can be taken into account when considering whether effects resulting from the proposal can be adequately avoided, remedied, or mitigated.

We request the opportunity to review the draft conditions prior to the decision being issued.

Appendix 1 – Record of Title



**RECORD OF TITLE
UNDER LAND TRANSFER ACT 2017
FREEHOLD
Search Copy**




R.W. Muir
Registrar-General
of Land

Identifier SA24D/1274
Land Registration District South Auckland
Date Issued 27 April 1979

Prior References
SA799/48 SA895/129

Estate Fee Simple
Area 2864 square metres more or less
Legal Description Lot 1 Deposited Plan South Auckland
26397

Registered Owners
SHSM Investments Limited

Interests
Subject to Section 15 of the Rotorua Town Lands Act 1920
Subject to Section 387B (4) Municipal Corporations Act 1954
12107595.3 Mortgage to ASB Bank Limited - 12.5.2021 at 4:22 pm

Appendix 2 – Site Plan



Motel units – see building plans for detail

Pool

Lounge

Games Room

Plunge Pools

Sauna

Legend	
	7 Tryon Street
	Amenity/Utility
	Carparks
	Pool
	Shared open space
	Shared covered space
	Entry/Exit
	Motel units – see building plans for detail

All measurements are approximate and subject to survey.



Imagery sourced from: LINZ Data Services
Property boundaries sourced from Land Information NZ. Crown Copyright reserved. Property boundaries accuracy: +/-1m in urban areas, +/-30m in rural areas.
Coordinate System: NZGD 2000 New Zealand Transverse Mercator
Datum: NZGD 2000 // This map was produced with ArcGIS Pro (Esri).

7 Tryon Street
Emergency Accommodation

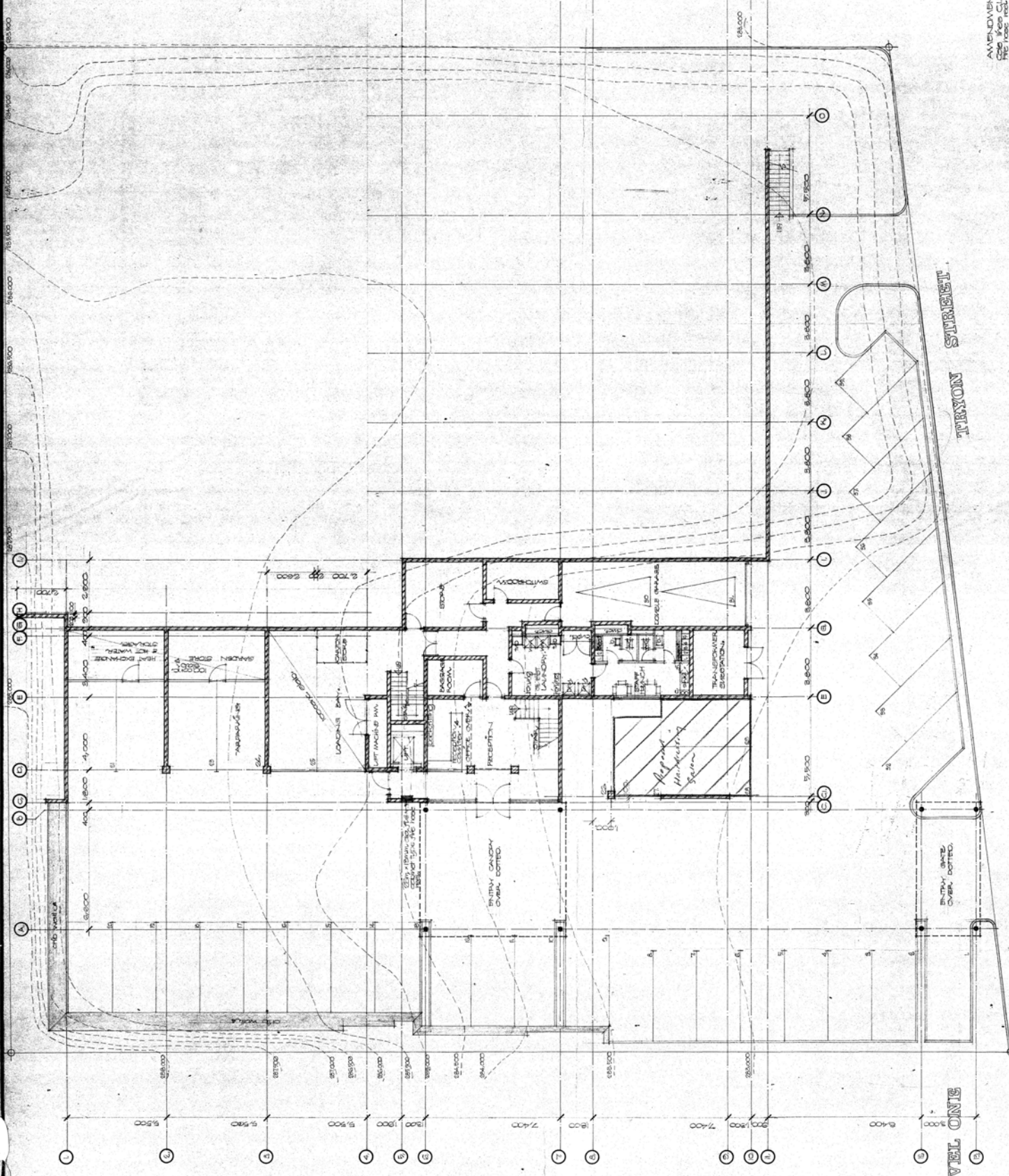


PREPARED BY JK Bellamkonda DATE 17/12/2021 SHEET 1 OF 1 TPG REF 717539 A3 Scale 1:200 0 6 Metres

NORTH

FROUDE STREET

TREYON STREET



PLAN LEVEL ONE
1:100

ROTORA INTERNATIONAL MOTEL FOR
JOHN WATTS & ASSOCIATES

PLAN
LEVEL ONE

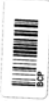
THE ONE IS ON THE CONTIGUOUS
TO VERIFY ALL DIMENSIONS AND
LEVELS BEFORE COMMENCE

N, J, WAGES & PARTNERS
80 MOKOA ROAD
SILVERHEAD AUCKLAND

L, R, ROBERTS & ASSOCIATES
80 MOKOA ROAD
SILVERHEAD AUCKLAND

DATE: JUNE '78
DRAWN: LRL
SCALE: 1:100

AMENDMENT 'A' 9/10/78. Polycast concrete
for use on 2nd floor.

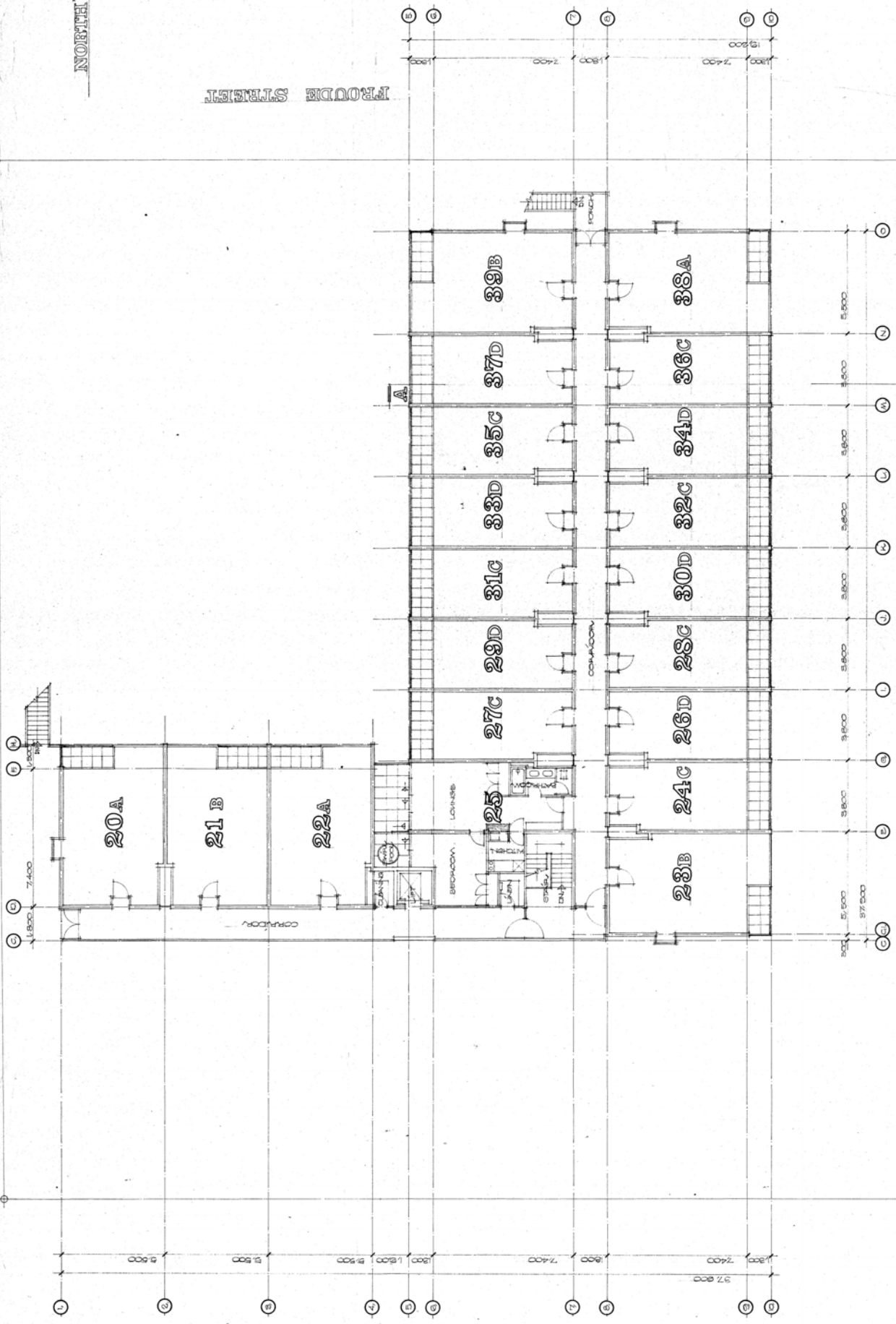


780373A

NORTH

FRONTSIDE STREET

TRAYON STREET



PLAN LEVEL THREE
1:100

ROTORUA INTERNATIONAL MOTEL FOR
JOHN WARD & ASSOCIATES.

PLAN
LEVEL THREE

THE CHAIR IS ON THE CONTRACTOR
TO VERIFY ALL DIMENSIONS AND
LEVELS BEFORE COMMENCING
ANY SITE PREP WORK.
AUCKLAND. PHONE 780 550 700555.

L. J. WARD & PARTNERS
181 PIERCEBY ROAD
AUCKLAND. PHONE 780 550 700555.

L. J. WARD & ASSOCIATES
80 MOKIA ROAD
BEKESHO AUCKLAND
PHONE 487927 FAX 484822

DWG
DRAWN
SCALE
DATE 7/8
LRR
1/100
7808/3

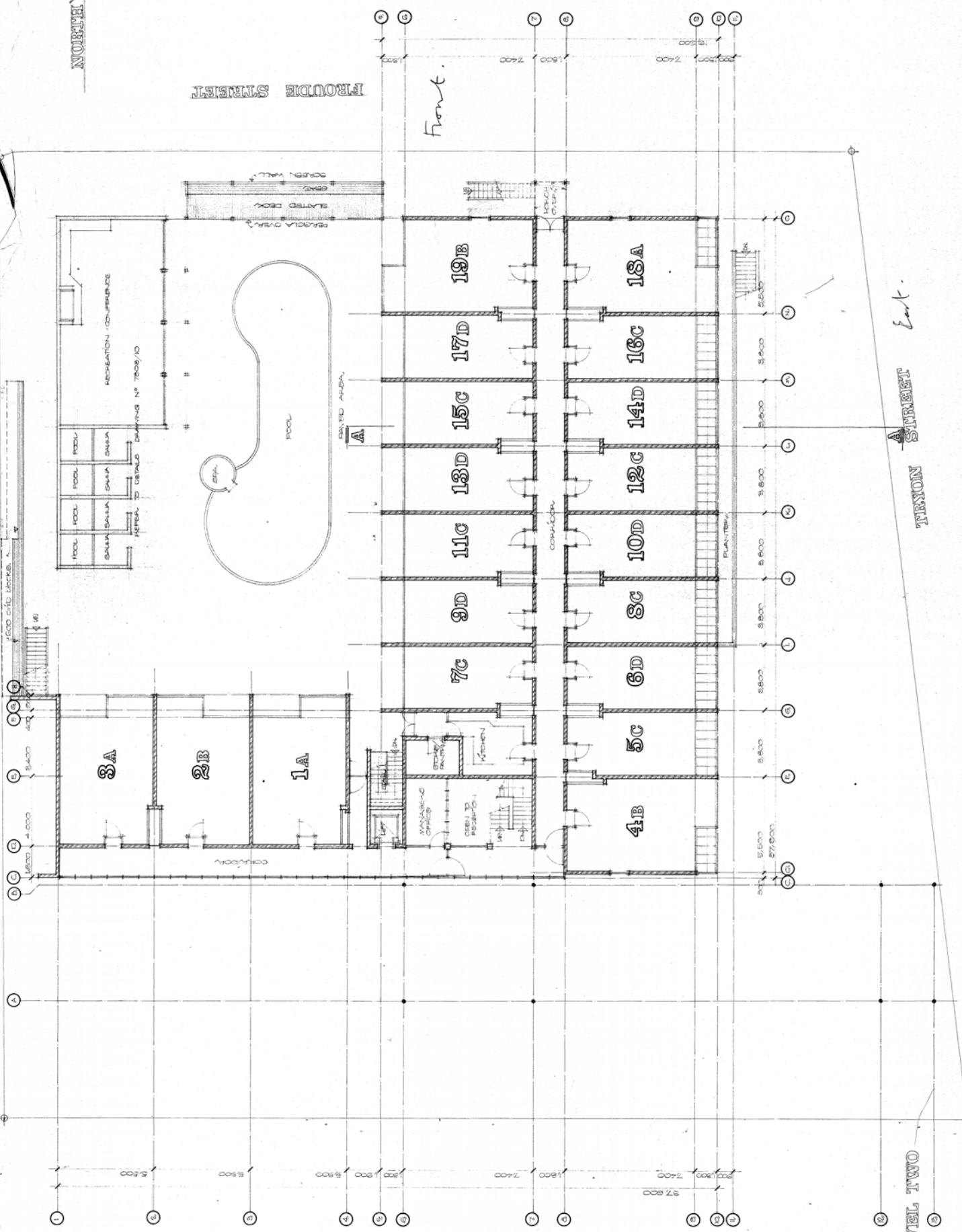
NORTH

FROUDE STREET

Front.

East.

TERYON STREET



PLAN LEVEL TWO
1:100

ROTORUA INTERNATIONAL MOTEL FOR
JOHN WARD & ASSOCIATES.

PLAN
LEVEL TWO

THE DRAWING IS ON THE ASSUMPTION
TO VERIFY ALL DIMENSIONS AND
LEVELS BEFORE COMMENCING
AND SITE OR BLUE WORK.

P. J. WARD & PARTNERS
151 ROBERTS ST.
AUCKLAND.
PHONE 7303322 732255

L. W. ROBERTS & ASSOCIATES
80 MACKAY ROAD
PĀKĀRANGI AUCKLAND
PHONE 4872257 FAX 4842252

DATE: JUNE 1978
DRAWN: L.W.R.
SCALE: 1:100

780374

Appendix 3 – Contracted Emergency Housing Factsheet

Contracted Emergency Housing Factsheet

What is Contracted Emergency Housing?

Emergency Housing Special Needs Grants (EH-SNGs) were introduced in 2016 to help vulnerable individuals and families with an immediate housing need to meet the cost of staying in short-term accommodation (predominantly motels). To date the service has largely operated with very limited (if any) support services for the clients staying in motels. Rotorua has been identified as an area that would benefit from an improved pilot version of this service, being Contracted Emergency Housing.

Rotorua city has experienced strong population growth over an extended period of time. The housing supply has not responded, and the number of building consents granted remains one of the lowest in New Zealand by population. This has resulted in a sharp increase over the past five years in median rents (54 percent) and house prices (84 percent) leading to increases in homelessness, including overcrowding. This has placed significant pressure on public, transitional and emergency housing. The volume of EH-SNGs in Rotorua is now the highest in the country by population.

The enhanced pilot model, including Contracted Emergency Housing, implements a suite of changes to improve outcomes and meet immediate housing needs. These changes include:

- Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development (HUD) contracting specific motels to provide emergency accommodation for families with children.
- providing increased support through HUD contracting additional wraparound support services to meet the needs of the clients in those contracted motels and MSD improving supports available for those remaining in current EH-SNG motel places.
- MSD, with a lead from local Iwi, implementing a Housing Hub (Te Pokapū) to strengthen assessment and placement processes for those needing emergency and other forms of housing, with a co-location of relevant services.
- This pilot approach in Rotorua also includes longer term supply solutions with Kāinga Ora - Homes and Communities scaling up work to identify new-build and acquisition opportunities.

It is expected that this combination of actions in Rotorua will result in increased quality and suitability of accommodation, increased support services, increased safety, better pathways to more-permanent housing, and streamlined assessment and placement processes for those with a housing need.

Who is Contracted Emergency Housing for?

Contracted Emergency Housing is for families and whānau with children, Rangatahi/young people, and disabled people.

How do you get placed into Contracted Emergency Housing?

Te Pokapū – the Rotorua Housing Hub will assess a whānau who present with an urgent housing need to identify the most appropriate motel and support services provider.

What does wraparound support involve?

Once the Contracted Emergency Housing Services Client or whānau has been identified, or the referral has been received, the service provider will:

- Carry out an assessment of the immediate needs of the client or whānau and arrange any necessary services to meet those needs.
- Meet regularly and work with each client or whānau to identify and manage issues that arise in relation to their stay in Contracted Emergency Housing.
- Prepare an individualised action and transition plan in conjunction with each client or whānau to document actions proposed to address any health, social, employment and financial needs.
- Assist in the transition to more permanent housing options where these are available.

How were motels were selected?

The Rotorua Taskforce, which includes iwi, local and central government agencies, identified a range of motels most suitable for whānau.

HUD was provided with a list of 41 motels to consider for contracting which included motels that directly approached HUD for consideration. A desktop review was completed to determine preferred properties which reduce the options down to 24 suitable candidates.

HUD then visited all 24 accommodation options along with MSD and support service providers who considered the following attributes:

- Number of units where living and sleeping was in the same room
- Any rooms adjoined that could be connected to make a larger unit
- Number of units that were accessible for those who have disabilities
- Natural light
- Was there appropriate cooking facilities/space for a full fridge if required
- Private bathrooms
- Was the space appropriate to enable good site management
- Privacy and noise management between units
- Shared spaces
- Laundry facilities
- Suitable access to the property – gates and fencing
- Any previous issues experienced
- Motel operators' willingness to undergo the resource consent process

A key factor in determining if a motel was successfully contracted was the openness and willingness of the motel operator and how they spoke about whānau.

Appendix 4 – Site Management Plan

SITE MANAGEMENT PLAN

August 2021

7 TYRON STREET, ROTORUA

CONTENTS

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1. INTRODUCTION:

Emergency Housing Special Needs Grants (EH-SNGs) were introduced in 2016, to provide temporary accommodation to meet an immediate housing need for vulnerable individuals and families. Emergency housing is most often provided through motels. There has been significant growth in EH-SNG numbers over the last two years with the volume of EH-SNGs in Rotorua being the highest in the country by population.

A Rotorua Housing Taskforce was established in March 2021 (made up of Rotorua Lakes Council, Te Arawa Iwi, HUD, MSD, Kāinga Ora and Te Puni Kokiri) to develop options for providing better support and outcomes for people living in emergency housing motels in Rotorua. HUD has been tasked with contracting specific motels to provide emergency accommodation for whanau and working with iwi to provide wrap around support services to meet the needs of whanau staying in motels.

This site management plan supports the resource consent application to use the existing site and buildings at Apollo Hotel, 7 Tyron Street, Rotorua for Contracted Emergency housing.

2. SITE MANAGEMENT

2.1 OCCUPANCY CAPACITY

The maximum number of occupants of the accommodation site **117** persons (not including infants under the age of 18 months). This does not include employed staff and their family, support staff or relief staff.

A register of the number of occupants in each unit, will be completed weekly. A record of the number of occupants residing at the site must be made available to the Council's Compliance Monitoring Officer upon request.

2.2 STAFFING AND SECURITY

The Motel Operator will have overall management of the property which provides cleaning and maintenance service on site, whilst the Support Service Provider will provide all onsite client support.

All Security Officers are certified at either level 1 or level 2 of the Private Security Personnel Licensing Authority's Certification. Certificate of approval (COA)

The following staff will be based at the site 7 Tyron Street, Rotorua:

Role	Description
Motel Operator	As required only
Cleaning staff	Rostered Daily
Support Service staff	Mon – Fri 9am till 5pm
Roaming Security	Roaming security will be in operation between the hours of 9am-5pm and on call as required. Security contact number is 0272328970.
Static Security	1 security guard will be onsite 24/7.

2.3 VISITORS

- Visitors will be not permitted on site.
- Persons visiting the site in the capacity of supporting the client alongside the support service providers are exempt from this rule.
- Uninvited visitors will be asked to leave by onsite staff. Security services or the Police will be called to assist if required.

2.4 HEALTH, SAFETY AND RESPONSIBILITIES

Consideration for access on and off the premises

- Apollo has 39 rooms over two stories. The facilities include two large reception areas.
- Entry is to the rooms is by swipe card only. No swipe card, no entry. All swipe cards will be delivered to and picked up from the security desk.
- Security will be housed at the very front entry in what is currently the gym. The visibility is almost 360 directly to Tryon Street (Holiday Inn carpark is directly opposite), the adjoining Froude Street, and through to the further adjoining Sala Street. This visibility will be crucial in spotting any potential unwanted persons approaching.
- Tryon Street is reasonably isolated. However, having the Holiday Inn as a direct neighbour, means there will be some general public in the immediate vicinity.
- Tryon Street is 500m from the main arterial road - Fenton Street.
- Fences along the rear boundary, adjoining an empty reserve, are 6ft high with security wire atop.
- Electronic equipment – Radio Transmitters , connected to the roaming security, will be in use by Security.
- Daybooks will record all incoming and outgoing authorised visitors/tenants.
- Nineteen hi definition cameras will be fully operational and available to Security.

The identification, management, and De-escalation of potential conflict

- All guards are trained in De-escalation techniques and meet monthly as a team to identify best practise areas for improvement. De-escalation is a core component of Security Certificates of Authority (COAs). All Supreme guards are certified at either level 1 or level 2 of the Private Security Personnel Licensing Authority's Certification.
- All guards at handover will identify any areas of potential conflict to their colleagues on handover at the end of their shift. Together they will identify methods required to manage them, including correct de-escalation techniques, and risk management protocols.
- Alcohol has been proven to escalate violence in emergency housing facilities. There will be no alcohol, visitors or drugs allowed on site.
- Apollo will impose a no visitor, no alcohol, and no drugs policy under the Wera Aotearoa contract.
- Security will be present on site and located in the front reception area.
- Security will perform hourly facility checks. Ensuring no non-authorised personnel are on site, and that all are safe.
- Wera Aotearoa staff as well as security have experiences dealing with people with acute mental health, drug and alcohol dependency issues. They recognise triggers and will utilise their skills to defuse/mitigate escalations that occur.
- Security will assist management to evacuate in the event of an emergency.
- Security on site will phone police as and when required.

The identification and reporting of Health, safety, and security hazards in the environment

- Security will record all hazards and health and safety issues in the Daybook.
- More serious issues will be recorded in the incident reporting book.
- If security needs assistance, other security guards are based at motels in close proximity and can be there to assist within a rapid timeframe.
- Senior guards/management of the security company will from time to time randomly check in on security at all motels secured.
- Hourly phone and Radio Transmitters welfare checks will be actioned across the Security Team on duty. At any given time, there could be up to 10 guards on duty within a 2-5 min drive up and down and just off Fenton Street.
- All staff are aware of the golden rule. **Safety First**. Safety for self, tenants, colleagues, members of the public and most especially – CHILDREN. If in doubt, staff have been authorised to dial 111.

Monitoring and reviewing incidents for quality improvement purposes

- Daybook notifications are imperative in identifying areas of risk and therefore areas for improvement.
- Regular meetings between Security management, Emergency Housing management of Wera Aotearoa and motel staff will take place on site.
- Daily reviews of incidents will be undertaken by Security, and improvements put in place immediately to either mitigate or eliminate similar incidents.
- Daily reviews of incidents will be undertaken by Security management, and improvements put in place immediately to either mitigate or eliminate similar incidents.

2.5 SITE MAINTENANCE

The roles and responsibilities for maintenance of the site is the responsibility of the motel operator. This includes:

- a regular maintenance programme to ensure the upkeep of the site, including gardening/landscaping, well presented and safe carpark, common areas, meeting rooms, and units.
- repairs
- inspection of individual units on turnover of households, with support from the Housing Support Provider.
- Provision of communal waste collection facilities for the disposal of household waste and recycling from the emergency accommodation units.

The motel operator will be the first point of contact for all maintenance and repairs. Requests are prioritised by health and safety considerations.

Some specialist repairs and maintenance may be contracted to tradespeople by the motel operator as required.

2.6 COMMUNAL LAUNDRY USE

The Communal Laundry areas are available for household use as directed by WERA Aotearoa. Households must provide their own laundry detergent.

Households are responsible for all of their own laundry.

2.7 NOISE MANAGEMENT

Noise levels shall not exceed the following limits when measured at any point within the boundary of a neighbouring residential site:

When	What time	Noise level
Daytime	7am to 7pm, any day except public holidays	50 dB LAeq (15 min)
Evening	7pm to 10pm any day except public holidays	45 dB LAeq (15 min)
Night-time and public holidays	At all other times	40 dB LAeq (15 min) 70 B LAmax

The following measures will be in place to manage noise perceived at the boundary limits:

- No recreational equipment to be used within five metres of the neighbouring residential boundary fences.
- Any illegal activities are prohibited in all areas of the site.
- Each person has responsibility for not causing disturbance to the quiet and peaceful enjoyment of the premises for other households and neighbours as outlined in the rules of stay.

Breaches to the Accommodation Agreement or Rules will be managed as per Tenancy Management Procedure.

2.8 EMERGENCY RESPONSE PLAN

The identification and reporting of health, safety, and security hazards in the environment

If an incident or hazard occurs onsite there is a reporting tool available for staff to record these either in hard copy or electronic format The following must be reported but is not limited to the below:

- Incident, accident, injury, illness, behaviour, vehicle incidents, complaints, threatening and harmful behaviour, harm and safety issues regarding children

All households will be treated with high respect and their information will remain confidential. Unless there is a risk to the household or others. If the police are required for further support, they will be contacted by a Wera Aotearoa staff member that is present.

After the staff member has completed the reporting tool a Wera Aotearoa manager will complete the outcome and action section of the reporting tool. If the incident is higher than a prescribed level, the report will be discussed with the CEO, General Manager, and the Board members. All safety measures and preventative actions will be put in place in a timely manner.

All onsite staff are trained in first aid, de-escalation and are able to complete/operate the reporting tool.

Child Protection – Vulnerable Children’s Act 2014: Wera Aotearoa holds in high regard the safety of Children and Young People. Wera Aotearoa protect children and support them to thrive and have a sense of belonging in their environment. Staff are trained to identify risk and harm including, but not limited to, malnutrition, miss treatment and abuse. We work alongside the household to source the most suitable supports that will enhance their family functioning and stability. Wera Aotearoa encourages and empowers whanau to develop strong and healthy relationships within the whanau and wider networks.

If abuse and neglect is identified, a Wera Aotearoa Social Worker will be contacted immediately. The social worker will meet with the whanau to establish a risk assessment plan. The social worker will make the decision whether it is appropriate to contact Oranga Tamariki. A report of concern will be reported via phone and email.

Employees – All Wera Aotearoa employees will complete a Ministry of Justice vetting form. To ensure they are safe to work with children.

Emergency Evacuation

In the event of an emergency evacuation, a site-specific alarm will be activated. Where it is safe to do so, emergency wardens will sweep the premises to ensure all households are removed from inside the building and all will be guided to the sites designated assembly point. From here, the chief warden will contact emergency services to discuss further action. This site-specific plan will be explained & available to all at intake / inductions

3. SUPPORT SERVICES

3.1 SUPPORT SERVICES PROVIDED

WERA Aotearoa will provide support services to each placed household, based on the principles of Te Hau ki te Kainga.

The support services include:

- Developing, with the household, an individualised plan to help the placed household work towards becoming a self-sufficient interdependent, vibrant whanau.
- Working with each placed household to identify and manage issues that arise during their stay in the property (e.g. damage or rent arrears)

Supporting whanau to:

- Access appropriate support for identified health and social issues by referring to other health and social service agencies.
- Carry out actions identified in their Housing Transition Plan (including making and attending appointments with relevant health and social service agencies).
- Assisting each placed household to identify and secure sustainable long-term housing that meets their needs and to assist them to move into that housing.
- Where appropriate, ensure that placed households are registered with the MSD Social Housing Register.
- Meet regularly with each household to ensure that any issues that may threaten the sustainability of the new housing solution are identified and addressed early.

Placed households are required to read, understand, and sign the Rules of Stay Agreement with the Support Service Provider Wera Aotearoa .

3.2 SUPPORT SERVICE PROVIDER DELIVERY

Support Service Provider staff will meet with each placed household to:

- plan, mentor & evaluate progress
- discuss social support that will be provided or coordinated and
- discuss all long-term housing options that will be considered.

The discussions and plans are recorded in the activities of the client's notes and in their Housing Transition Plan.

Housing Service Provider Staff will:

- assess what support is required for the whanau
- refer whanau to social support and health organisations as appropriate
- work with whanau for the duration of their stay (meeting at least weekly or more frequently as appropriate)

- support the placed household to explore longer term housing options, including support to make applications for housing
- explore options and then undertake a brokerage role, as required, with the private sector, community housing providers and Kāinga Ora – Homes and Communities
- support whanau to access all necessary resources, including financial support through appropriate agencies
- meet regularly with households

The Support Staff will:

- meet with the whanau on site to sign a Rules of Stay agreement and
- check the condition of the unit and if necessary, complete a report
- discuss the rules of stay to ensure they are understood and agreed
- carry out regular inspections and meth testing.

4. RULES OF AGREEMENT

Before moving into a Contracted Emergency housing unit, the placed individual / household must read, review and sign a Rules of Stay Agreement.

5. POINT OF CONTACT

Name	Role	Phone	Email
Bharat Chandnaani	Motel Operator	021 0271-1662 07 347-3333 0800 355-575	Bharat.c@xtra.co.nz Res@apollohotelrotorua.co.nz