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Tēnā koutou

Submission on Resource Consent Applications by Ministry for Housing and Urban Development (MHUD) for contracted emergency housing at seven properties in Rotorua

1. This is a submission on behalf of Restore Rotorua Incorporated (**Restore Rotorua**) on seven applications for resource consent for contracted emergency housing at the following properties:
 - (a) LU24-010186 – Alpin Motel – 16 Sala Street;
 - (b) LU24-010187 – Apollo Hotel – 7 Tyron Street;
 - (c) LU24-010188 – Ascot on Fenton – 247 Fenton Street and 12 Toko Street;
 - (d) LU24-010189 – Geneva Motor Lodge – 299 Fenton Street;
 - (e) LU24-010190 – Lake Rotorua Motel – 131 Lake Road;
 - (f) LU24-010191 – Pohutu Motor Lodge - 3 Meade Street;
 - (g) LU24-010192 – Rotovegas Motel – 245-251 Fenton Street, 14-16 Toko Street and 8A, 8B and 10B Toko Street.

(the **Applications**).

2. Restore Rotorua is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.
3. Restore Rotorua's submission relates to all parts of the Applications.
4. Restore Rotorua opposes the Applications. The reasons for Restore Rotorua's opposition are that:
 - (a) Resource consents for contracted emergency housing at the seven sites which are the subject of the Applications were granted for a two year period. This was in clear recognition of the adverse effects of these activities on the Rotorua community. The Commissioners' decision dated 15 December 2022 stated:

By granting a realistic short-term consent, the Commission has given the parties the opportunity to find a better solution. The Commission is advised, that RLC is intending to promote a policy of short-term consent (although we were not told what the policy was).

- (b) The consent process which resulted in two year resource consents was lengthy and complex and took a huge toll on the Rotorua community. Restore Rotorua participated as submitters. Restore Rotorua estimates that it alone has spent approximately \$700,000

in costs which are directly attributable to the consent process. It is wholly disappointed that MHUD has not phased out contracted emergency housing in Rotorua;

- (c) It is incomprehensible that MHUD has failed to find a better solution in two years, and Restore Rotorua questions whether MHUD ever intended to deliver on the two year period granted by the Commissioners in December 2022. The Exit Strategy proposed does not go far enough;
- (d) The effects of the Applications on safety associated with anti-social behaviour are substantial and of concern. This is particularly with respect to the amenity of surrounding properties. Restore Rotorua’s experience is not of the very low/low/moderate levels described in the Beca Social Impact Assessment 2022 – 2024. Restore Rotorua will be calling evidence on this at the hearing and will ask that evidence based on direct experience be preferred over survey evidence collected by consultants;
- (e) The contracted emergency housing has had significant social and economic impacts on the Rotorua community, and this will be compounded by granting consent to seven sites for an additional 12 month period. Restore Rotorua is aware of at least one case where a house sale has been lost due to the existence of contracted emergency housing;
- (f) The traffic safety effects associated with some Applications are adverse, particularly where there are no pedestrian crossings (e.g. Geneva Motor Lodge). The Applications do not appear to contain traffic safety assessments and Restore Rotorua submits that the Commissioners do not have sufficient information on this issue;
- (g) The significant adverse effects associated with the Applications cannot be avoided, remedied or mitigated and therefore the Applications should not be granted;
- (h) The significant adverse effects associated with the Applications are unacceptable, particularly when considered in conjunction with the other existing emergency housing sites in Rotorua;
- (i) The economic effects of the Applications are significant, both in terms of lost tourism revenue with the use of the motel for emergency housing rather than to accommodate tourists, and also the associated lost tourism revenue associated with safety concerns in central Rotorua;
- (j) The Applications are inconsistent with the policy framework in the Rotorua District Plan;
- (k) The Applications, which are for non-complying activities, will not comply with s 104D(1)(a) or (b) of the RMA;
- (l) The Applications are inconsistent with the policy framework in the Bay of Plenty Regional Policy Statement;
- (m) The Applications are inconsistent with the objectives and policies of the National Policy Statement for Urban Development 2020;
- (n) The Applications do not give effect to Part 2 of the RMA.



