

Submission Summary

Contracted Emergency Housing

Alpin Motel – LU24-010186
Apollo Hotel – LU24-010187
Ascot on Fenton – LU24-010188
Geneva Motor Lodge – LU24-010189
Lake Rotorua Hotel – LU24-010190
Pohutu Lodge Motel – LU24-010191
RotoVegas Motel – LU24-010192

1.0 Overview

The purpose of this summary is to provide submitters and other relevant parties with an overview of the issues raised in submissions across all seven resource consent applications for Contracted Emergency Housing.

The Ministry of Housing and Urban Development (**MHUD**) requested that all of the applications be publicly notified. Public notification occurred on 20th July 2024.

In overview:

- Council received **176** submissions from **37** submitters.
- Across all seven applications there were **36** submitters opposing and **1** submitter supporting.
- **27** submitters wish to be heard at the hearings.
- **21** submitters submitted on all seven applications and **10** submitters submitted on just one application.
- No submitters outlined conditions or changes they would like to see if the applications were granted consent.

As the submissions raised similar issues, a collective approach to the submission analysis has been undertaken. Collective analysis of the submissions provides an understanding of the key themes raised across all seven applications. For submitters who submitted on a specific application, an analysis of their submissions will be provided in the s42a report for that application.

The analysis table contains approximately 40 matters raised, which have been broadly grouped into the following themes:

- Social
- Economic
- Character / amenity
- Planning
- Exit strategy
- Cultural
- Traffic
- Other

Approximately 260 individual points were raised in submissions, and these are outlined in **Table 1**.

It was apparent through several submissions that some submitters do not distinguish between the Contracted Emergency Housing providers and other motels being used for emergency housing by Ministry of Social Development (**MSD**) clients. A number of submitters also referred to MSD motels in their submission.

Table 1: Submission themes and matters raised

Themes (no. of submission points)	Matters raised (no. of submission points)
Social (117) *N.B. – two matters raised were in support.	Site management (7)
	Security (7)
	Social impacts (10)
	Increased pressure on social services (6)
	Increased pressure on infrastructure (4)
	Impact on schools (3)
	Increased crime (14)
	Homelessness (6)
	Concerns for safety of the community and visitors (15)
	Negative impacts on community wellbeing (6)
	Undesirable behaviour: aggression, intimidation, anti-social behaviour (17)
	Adverse effects on prospective tenants and buyers (6)
	Motels not fit for purpose / inappropriate (5)
	No need for contracted emergency housing (4)
	Wrap-around services inadequate (4)
	Social Impact Assessment not accurate (1)
Wrap-around services adequate (1)*	
Need for contracted emergency housing (1)*	
Economic (65)	Economic effects (6)
	Waste of taxpayer money (6)
	Negative impact on tourism (15)
	Out of town people relocating to Rotorua (8)
	Length of stay (2)
	Effects on property values (6)
	Cost of previous consent process (4)
	Negative impacts on businesses (4)
	Motels should be returned to tourist accommodation (14)
Character / amenity (31)	Effects on Rotorua’s reputation / image (11)
	Impact on surrounding residents / neighbourhood (14)
	Increased rubbish / litter (6)
Planning (16)	Extension of consents / activity duration (10)
	Inconsistency with Rotorua District Plan (4)
	Inconsistency with BoP Regional Policy Statement (1)
	Inconsistency with Part 2 of the RMA (1)
Exit strategy (14)	Lack of exit strategy (14)
Cultural (5)	Impacts on cultural heritage and mana whenua (3)
	Inadequate consultation with mana whenua (2)
Traffic (3)	Traffic safety effects (3)
Other (9)	Government breaking their election promise (4)
	Discrepancies in MHUD reporting / statistics (5)

2.0 Matters Raised

2.1 Social Effects

The main matters that arose from the submissions were 'social' issues, including crime (theft, vandalism) and undesirable behaviour (intimidation, aggression, violence, verbal abuse), with many submitters stating this had increased since emergency housing had been established. 14 submitters addressed increased crime, while 17 submitters discussed undesirable behaviour. It is not clear whether the people demonstrating undesirable / anti-social behaviour are clients of Contracted Emergency Housing.

Due to the occurrences outlined above, submitters were concerned for their safety within the neighbourhood (both within their homes or businesses and on the streets).

Eight submitters expressed concern that not all emergency housing tenants were from Rotorua. Comments such as "*manufactured homelessness*", "*homeless industry*", or "*New Zealand's homeless destination*" expressed views that MHUD and/or MSD are actively providing emergency housing for people who are not from Rotorua. Submitters referred to newspaper articles, government reports, and advertising on social media platforms that suggest some emergency housing tenants are coming to Rotorua from around the country due to the availability of emergency housing. Several submitters considered whether emergency housing would be necessary, if 'out of town' people were not being relocated to Rotorua.

Several submitters were concerned about the increased pressure on social services and infrastructure as a result of emergency housing. The services mentioned that are currently under pressure include police, schools, hospitals, doctors and nurses. Three submitters stated that the wrap-around services provided are inadequate.

Five submitters have stated that they do not think motel accommodation is suitable for contracted emergency housing, while seven submitters raised 'site management' and 'security' relating to the Contracted Emergency Housing as issues.

In contrast, one submitter expressed that the wrap-around services provided were adequate, as well as stating that there remains a need for Contracted Emergency Housing in Rotorua.

2.2 Economic Effects

15 submitters stated that the applications are having an adverse impact on the tourism sector of Rotorua. Submitters discussed how the use of the motels for emergency housing meant there was a lack accommodation options in central Rotorua. The lack of accommodation meant that visitors were either reducing their length of stay or choosing to stay in nearby areas such as Taupō. Several submitters commented on how undesirable behaviours observed around emergency housing and on Fenton Street is contributing to an unsafe environment for tourists and visitors. Also mentioned were the negative effects of emergency housing on Rotorua's reputation resulting in people choosing to avoid visiting Rotorua.

Additionally, other economic-related issues raised by submitters included:

- Six submitters discussed the effects of emergency housing on property values in surrounding neighbourhoods. One submitter described how the ‘application for an extension of contracted emergency housing’ was the main reason their sale agreement was cancelled with respect to selling their property.
- Several submitters also stated that the emergency housing has been affecting the operation of surrounding businesses.
- Four submitters discussed the costs associated with the previous consent process as reason not to proceed with the applications.

2.3 Character and Amenity Effects

11 submitters commented that emergency housing was causing an adverse effect on the reputation of Rotorua. This relates to the local and international ‘brand’ of Rotorua, visitors’ opinions of Rotorua, and locals’ opinions of Rotorua. Submitters stated that with the influx of emergency housing and subsequent factors of undesirable behaviour, crime and increased rubbish, the ‘reputation’ of Rotorua has changed. Some submitters referenced newspaper articles or news outlets commenting on the deterioration of Rotorua because of emergency housing.

14 submitters expressed concern regarding the impacts of emergency housing on residential/neighbourhood character and amenity, typically citing neighbourhood safety, noise and rubbish as key issues. Submitters described how contracted emergency housing has led to significant adverse effects on the surrounding community. Six submitters specifically described an increase in rubbish and abandoned shopping trolleys in neighbourhoods surrounding emergency housing providers. One submitter described experiencing zero negative incidents related to the contracted emergency housing.

2.4 Planning Matters

Ten submitters commented on the continued extension of the activity and consent duration. This included stating that one additional year was too long, and the activity should cease when the existing consents expire in December 2024. Several submitters expressed concerns that this process will continue if the applications are granted, and that they have already been operating as emergency housing for some time.

Three submitters stated the applications were inconsistent or contrary to either the District Plan, Bay of Plenty Regional Policy Statement or the Resource Management Act (**RMA**). The reasoning provided included:

- The use of the motels for contracted emergency housing is not consistent with the underlying zoning.
- The activity contravenes the objectives and policies of the Rotorua District Plan.
- The adverse effects of the activity on the environment cannot be avoided, mitigated or remedied.

2.5 Exit Strategy

14 submitters commented on the ‘exit strategy’ and, specifically, on the lack of exit strategy provided by MHUD. This often tied into the submitter’s concerns that the Contracted Emergency

Housing will continue to be extended beyond the consent term being sought, or was noted in the context of the existing consent conditions requiring an exit plan.

2.6 Cultural Effects

Three submitters discussed the cultural effects relating contracted emergency housing.

Firstly, submitters expressed that the use of three locations for Contracted Emergency Housing disrupts the cultural landscape and infringes upon the spiritual and historical integrity of their marae, in relation to the applications at Apollo Motel, Pohutu Lodge Motel and Alpin Motel. The submitters noted, in relation to cultural effects, the District Plan's objectives of *"...safeguarding cultural heritage and ensuring developments respect and enhance cultural values of tangata whenua..."*

Secondly, two submitters raised that there was a lack of consultation with mana whenua. The submitters referenced this in relation to the District Plan provisions, stating a *"...lack of genuine engagement and recognitions of the concerns of Tūhourangi Ngāti Wāhaio regarding these developments highlights a significant oversight in adhering to these provisions..."*.

2.7 Traffic Effects

Three submitters raised concerns about traffic effects. One submitter highlighted 'parking issues' associated with the Contracted Emergency Housing, while another submitter referred specifically to Lake Rotorua Motel being unsuitable for children due to the proximity to a busy road. A third submitter discussed traffic safety generally across all sites, particularly where there are no pedestrian crossings, providing Geneva Motor Lodge as an example of this.

2.8 Other Matters

A number of submitters expressed their frustrations at other matters, including:

- Concerns about the lack of consultation with the community.
- Concerns that the motel owners / managers are making large profits from emergency housing.
- The government, both central government and local government, have broken election promises in relation to solving housing issues in Rotorua.
- Discrepancies in the reporting and statistics released by MHUD on contracted emergency housing occupancy rates and homelessness in Rotorua.

3.0 Relief Sought

36 submitters seek that the consents be declined, and one submitter seeks that the consents be granted.

4.0 Geographical Analysis

A geographical analysis of the submissions has been prepared to demonstrate the spatial extent of people submitting on the applications. **Map 1** provides an overview of all submitter locations (derived from the address provided by the submitter), while **Map 2** provides a more localised view

of submissions around the Contracted Emergency Housing application locations. Several submitters are not represented on the map as a street address was not provided in their submission.

In **Map 1**, the location of submitters is generally clustered around the Rotorua CBD and surrounds.

In **Map 2**, smaller clusters of opposing submissions surrounding the CEH locations can be observed, with approximately 11 submissions made by neighbours. The one submission made in support of the applications was also made by a neighbour. The remainder of submissions were made by people located further away, either in adjacent suburbs or in the wider Rotorua area (noting this does not account for those submitters that did not provide an address).

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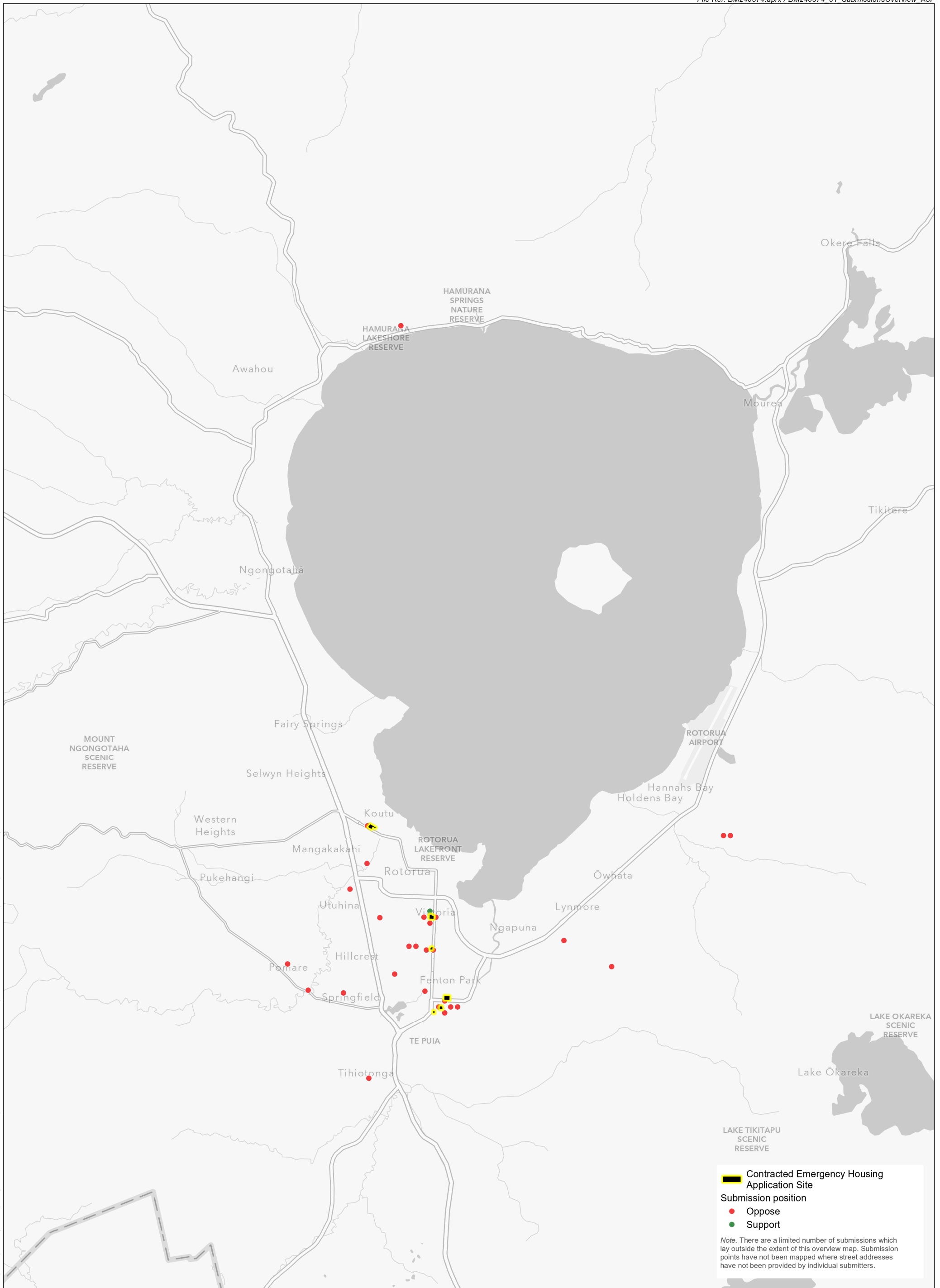
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Data Sources: BML, LINZ, Stats NZ, Esri, TomTom, Garmin, Foursquare, METI/NASA, USGS

Projection: NZGD 2000 New Zealand Transverse Mercator

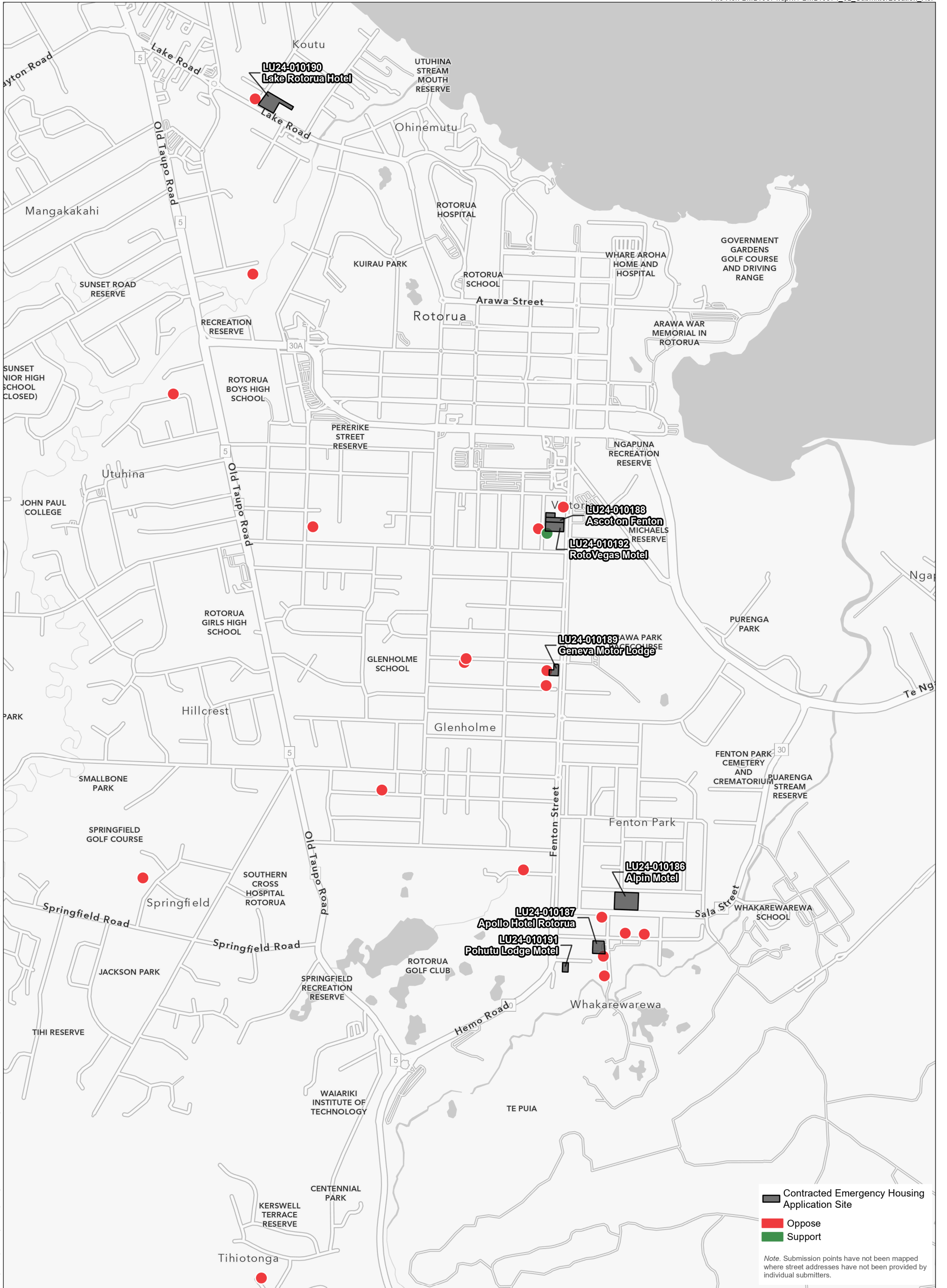
CONTRACTED EMERGENCY HOUSING RESOURCE CONSENT APPLICATIONS

Overview of Submitter Location

Date: 11 September 2024 | Revision: 2

Plan prepared for Rotorua Lakes Council by Boffa Miskell Limited

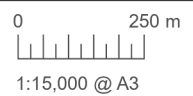
Project Manager: sean.grace@boffamiskell.co.nz | Drawn: JWa | Checked: NPR



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Contracted Emergency Housing Application Site
 Oppose
 Support

Note: Submission points have not been mapped where street addresses have not been provided by individual submitters.



Data Sources: BML, Esri Community Maps Contributors, LINZ, Stats NZ, Esri, TomTom, Garmin, Foursquare, METI/NASA, USGS
 Projection: NZGD 2000 New Zealand Transverse Mercator

CONTRACTED EMERGENCY HOUSING RESOURCE CONSENT APPLICATIONS
 Location of Submitters

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