

Before Independent Hearings Commissioners

Rotorua Lakes Council

In the matter of **7 applications for resource consent for
contracted emergency housing by Te Tūāpapa
Kura Kāinga Ministry of Housing and Urban
Development**

Statement of evidence by Joanne Healy Social Impact

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Counsel

Nick Whittington
Hawkestone Chambers
PO Box 12091, Thorndon,
Wellington 6144
+64 21 861 814
nick.whittington@hawkestone.co.nz

Statement of evidence by Joanne Healy

1 Introduction

- 1.1 My full name is Joanne (Jo) Patricia Healy. I am a Social Outcomes Specialist and Planner with Beca Limited where I have been employed since 2016. I currently hold the role of Senior Associate Social Impact Specialist.
- 1.2 I undertook the Social Impact Assessment (**SIA**), supported by my social impact team. The SIA formed part of the seven resource consent applications (known collectively as '**the applications**' by the applicant (Te Tūāpapa Kura Kāinga - Ministry of Housing and Urban Development (HUD)).

2 Qualifications and Experience

- 2.1 I have the following qualifications and experience relevant to these applications:
 - (a) Bachelor of Science (First Class Honours) in Geography from the University of Auckland;
 - (b) Bachelor of Health Science in Occupational Therapy from the Auckland Institute of Technology;
 - (c) Member of the International Association of Public Participation (IAP2) and I have undertaken the IAP2 Certificate Programme in Public Participation;
 - (d) Over 7 years professional experience in social impact assessment and consultation; and
 - (e) Over 15 years' professional experience as an Occupational Therapist. Primarily in mental health (hospitals, crisis team and community), working with vulnerable youth and adults with complex needs (including those who were without secure housing). This work included liaising with community providers of accommodation and respite facilities.

- 2.2 I was the primary author of the SIA and presented evidence for the 13 resource consent applications for contracted emergency housing for Te Tūāpapa Kura Kāinga - Ministry of Housing and Urban Development in the 2022 hearing.
- 2.3 In addition to the above, I have led or supported (as specified) the preparation of SIAs for a number of infrastructure, social service and land use matters. These include the following:
- (a) The change in designated use for the establishment of a Youth Justice facility at the existing Whakatakapokai site (co-author), for Oranga Tamariki.
 - (b) The alteration of designated use for the continued operation of Korowai Manaaki Youth Justice facility (co-author), for Oranga Tamariki.
 - (c) Peer review of the Social Impact Monitoring Report for Wiri Prison (social impact review team), Auckland, for Ara Poutama Aotearoa / Department of Corrections (Ara Poutama).
 - (d) Resource consent application to establish a rehabilitative and reintegrative residential accommodation programme within an existing property in a residential zone within Christchurch (co-author) for Ara Poutama.
 - (e) Baseline social impact study of Tai Aroha, an operative rehabilitative and reintegrative residential accommodation programme within a residential zone in Hamilton (co-author) for Ara Poutama.
 - (f) Peer Review - Ohinewai Plan Change Submissions (residential, commercial and manufacturing zoning of rural land), for Waikato District Council. This included preparation and presentation of hearing evidence.
 - (g) Queenstown Arterials Notice of Requirement (lead author), for Queenstown Lakes District Council. This went through a Fast Track Consent Process and included developing conditions and responding to panel queries.

- (h) Notice of Requirement and Resource Consent for Southern Rail Stations in Auckland (lead author) for KiwiRail (as part of the Te Tupu Ngātahi Supporting Growth Alliance) (Fast Track Application).
- (i) Bothamley Park Sewer Replacement Resource Consent Application (Lead Author), for Kāinga Ora in Wellington (Fast Track Application).

3 Code of conduct

- 3.1 While I acknowledge this is a Council-level hearing, I have read and am familiar with the Environment Court's Code of Conduct for Expert Witnesses, contained in the Environment Court Practice Note 2023, and agree to comply with it. My qualifications as an expert are set out above. Other than where I state that I am relying on the advice of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

4 Scope and summary of evidence

- 4.1 My evidence addresses the social impact of the operation of seven contracted emergency housing motels in Rotorua for one year as per the consent application. My evidence is structured as follows:
 - (a) SIA methodology.
 - (b) Summary of key SIA findings.
 - (c) My comments on the section 42A report.
 - (d) My comments on submissions.

5 Social Impact Assessment Methodology

- 5.1 The full description of the SIA methodology is available in Section 2 of my report. This is a summary of that section of the report.
- 5.2 The SIA methodology followed the general approach taken in the previous 2022 SIA. The SIA for the current application set out to understand whether the previously identified potential social impacts had changed

and whether the implemented recommendations had been effective at mitigating these impacts. It also assessed the potential social impacts of the consent application in relation to the change in number of Contracted Emergency Housing (CEH) operating, length of time proposed and closure strategy.

5.3 To enable this assessment the following work was undertaken:

- (a) Scoping the proposal to confirm the communities of interest and updated context.
- (b) Gathering primary and secondary information on the community and proposal.
- (c) Profiling the existing environment with a focus on changes since the 2022 SIA.

5.4 The SIA assesses the changes that have occurred since the previous SIA and consenting of CEH in 2022 in order to identify potential social impacts for the continued operation of seven CEH for another year. This was in the context of the existing surrounding environment currently experienced by the local community, with respect to the changes that occurred in the 18 months between the resource consent approval and the completion of the SIA.

5.5 When assessing the potential social impacts of the continued operation of seven CEH I considered the existing environment and two future scenarios: one where the resources consents are granted and one where they declined. Assumptions relating to each of these scenarios are outlined below.

- (a) If the resource consents are **declined**, it is considered/assumed that:
 - (i) The subject sites may be used as a motel, other alternate accommodation or become vacant.
 - (ii) A small percentage of CEH residents would be transitioned to transitional housing, social housing or private housing.
 - (iii) Given that this housing supply is not currently available to meet demand the majority of CEH residents would need to

access Emergency Housing Grants through the Ministry of Social Development and/or seek alternate housing (in Rotorua or elsewhere), return to unsuitable accommodation (e.g. places they left due to safety or overcrowding), live in vehicles or be homeless.

- (b) If the resource consents are **granted** it is considered/assumed that:
- (i) The seven CEH motels would continue to operate for a maximum of one year to 15 December 2025.
 - (ii) CEH residents will be transitioned to alternate accommodation (social, private or transitional housing) as this becomes available.
 - (iii) From June 2025, new referrals for emergency housing will be accommodated in transitional housing or non-contracted emergency housing motels.
 - (iv) The remainder of existing CEH residents and new referrals would need to seek alternate emergency housing (in Rotorua or elsewhere), return to unsuitable accommodation (e.g. places they left due to safety or overcrowding), live in vehicles or be homeless

5.6 The SIA assessed potential social impacts on:

- (a) *Way of life* – how people live their lives and move around the area.
- (b) *Tourism character* – the character and reputation of tourism.
- (c) *Residential character* – the character and reputation of the residential area.
- (d) *Community services* – delivery of community services.
- (e) *Community cohesion and stability* – how the community operates and the stability of the community.
- (f) *Environmental amenity* – the experience of the community environment, sense of place.

- (g) *Health and wellbeing* - health is a state of complete physical, mental, social and spiritual wellbeing and not merely the absence of disease or infirmity.
- (h) *Political systems* – the extent to which people are able to participate in decisions that affect their lives, the level of democratisation that is taking place, and the resources provided for this purpose.

5.7 Potential impacts were also considered at different scales:

- (a) Wider community – Rotorua District;
- (b) Local communities – those communities where CEH are located (Koutu, Victoria, Glenholme, Fenton Park and Whakarewarewa);
- (c) Neighbours – those living directly adjacent to CEH sites.

6 Social impact findings

6.1 Findings from the SIA are summarised below followed by a summary of the specific impacts identified.

6.2 Data collected for the community profile identified that tourism is returning to Rotorua (although the return of the international market is stronger than domestic) and there is economic growth, however there are economic and cost of living issues (that are also being experienced nationally). The number of CEH motels operating has (and will continue to) decrease and other motels providing emergency housing through emergency housing special needs grants (EH-SNG) have also decreased significantly since CEH motels were consented in 2022.

6.3 Changes made following the consenting of CEH to improve the amenity of CEH has mitigated negative impacts on tourist character, residential character and environmental amenity.

6.4 For the local and wider community, the main issues are associated with anti-social behaviour and crime. These issues are experienced across the local communities where CEH are located and beyond, in particular in the CBD. Whilst some community members residing in CEH motels may contribute to these issues, this is occurring offsite and is not a direct result of the activity. Issues of behaviour were likely to be pre-existing prior to

residing in CEH motels and would likely also occur if these residents were residing elsewhere or were transient.

- 6.5 Proximity to the CEH sites may increase the potential severity and likelihood of negative social impacts. Neighbours have experienced negative social impacts on way of life, health and wellbeing, and amenity of living environment arising from incidents of trespassing (residents or visitors of CEH jumping fences or unknown people coming up their driveway and accosting family members); hearing/witnessing loud arguments, domestic and child abuse; and burglary. Not all of these reported incidents had evidence to suggest that residents or visitors of CEH were responsible.
- 6.6 Overall, I concluded that while CEH does not *cause* anti-social behaviour it does by nature of its operation and number of residents increase the likelihood of exposure to these events. That said, the presence of onsite support services decreases these occurrences compared to an unsupported housing site.
- 6.7 Dependent on individual's experiences and frequency of events it is considered that CEH has a very low to moderate negative impact on neighbours.
- 6.8 CEH has positive social impacts for the members of the community it serves, providing stability, shelter and support services. The use of these motel sites as temporary accommodation was generally reported by CEH residents as suitable, though limited in facilities. Operation of CEH has positive social impacts for many residents in terms of the support it provides, and significant positive impacts compared to the alternatives available at the current time.
- 6.9 I consider that if the consents are granted the proposed conditions referring to the amenity of the site (Landscaping, Open Space and Boundary Fencing; Motel Signage and Advertising; and, Streetscape Amenity) and the Community Liaison Group (subject to review) can appropriately manage these social issues. In addition to this, I recommend that the Community Liaison Group is reviewed to improve communication and collaboration. I note that this recommendation was discussed at the Community Liaison Group Hui on 26 September which indicates commencement of this recommendation. The minutes from this meeting

suggest that initial changes made via attendance of HUD and Council representatives were positively received. I also recommend more proactive engagement with neighbours to work together to find solutions to reduce incidents such as trespassing (this is addressed in further detail in Section 7.9 of this evidence).

7 Section 42A Reports and Supporting Evidence

Evidence of Rebecca Foy – Social Impact Review

7.1 I have reviewed the Statement of Evidence of Ms. Rebecca Foy. I note that we are largely in agreement, especially that the location of the activity does increase the likelihood of experiences, and that alternative living situations to CEH would be damaging/ negative for CEH residents. However, there remain some points that require further response and clarification. I will respond to each of these in turn below.

SIA methodology

- 7.2 Ms. Foy confirms that the SIA has provided a balanced coverage of the likely social impacts arising from the CEH model (Paragraph 43) and that the methodology undertaken by Beca is appropriate (Paragraph 46).
- 7.3 However, Ms. Foy notes that the SIA does not describe the number or nature of land use activities surrounding the CEH motels (Paragraph 46e) and has prepared a summary of the count of properties and land use activity for neighbouring properties close to the CEH motels.
- 7.4 To clarify, in the preparation of this SIA, I have relied upon the descriptions of land use activities surrounding the CEH motels, as outlined within the planning assessment (refer to the Resource Consent Applications for the seven CEH sites).
- 7.5 With regard to the weightings of effects, Ms Foy notes that the application of generalised weightings is a standard SIA methodology, and also states that because the weightings are generalised, they do not show the spectrum of social effects that can be, or have been, experienced by individuals. Ms Foy considers that the application of a generalised weighting can, in many cases, mask the range of effects experienced (Paragraph 48).

7.6 The methodology as recognised by Ms Foy is standard best practice. Part of this practice is to describe the range of impacts likely or in this case being experienced by the community. In this description, more individualised events or impacts are highlighted. The rating considers the overall 'social' or community impact including factors of causation, likelihood, extent and severity. I therefore consider that this recognised methodology does take in a range of experiences in the process of rating the impact and the description of impacts provides details of these. This is not masking impacts but rather considering them in the context of the community as is the purpose of a SIA.

Assessment of health and safety wellbeing outcomes

7.7 Ms. Foy does not agree that impacts on the local community are less than neighbours as in some instances experience of antisocial behaviour is very stressful and generates at least moderate negative impacts on the health, safety and wellbeing on the local community (Paragraph 86).

7.8 To clarify, I agree that the experience of anti-social incidents (many of those noted in submissions) by local community members are extremely stressful. However, the distinction I make in my assessment between neighbours impacts and the wider community is an overall assessment of the attribution of said impacts on the activity being assessed (the operation of CEH). Ms Foy and I both agree that offsite anti-social behaviour by CEH tenants is not likely to be caused by the CEH activity and behaviours are likely to be pre-existing (Paragraph 87). We both agree that by having a number of sites housing people with complex issues the likelihood of antisocial behaviour on these sites may increase (noting that this sort of behaviour is not generalised to all CEH residents). I therefore remain of the view outlined in my assessment that there is a differentiation of impacts on neighbours and the wider local community.

7.9 Ms Foy questions whether the recommendation (relating to health and safety wellbeing outcomes) to proactively engage with neighbours is achievable given the low number of responses to the survey undertaken as part of the SIA (Paragraphs 93 to 95). I do not think a survey method is equitable to direct engagement recommended and consider that approaching neighbours directly to resolve issues is achievable.

7.10 I note that some neighbours are already raising issues with CEH sites and motel operators/support providers have responded and implemented additional measures where they are able. However, I continue to be of the opinion that a more permanent solution may be available to prevent trespassing where this has been an issue or concern (for example installing higher or alternate types of fences and/or security cameras). This would need to be in negotiation with neighbours as it is their property boundary. This does not need to be conditioned but is a recommended action for site operators.

Assessment of cohesiveness outcomes

7.11 Ms. Foy does not agree that there are negligible to low negative impacts on stability and cohesion of the local and wider community and believes that this weighting discounts the lived effects of immediate neighbours and the additive effects of the CEH motels being continued past their current December 2024 consent expiry date (Paragraph 119).

7.12 Ms. Foy contends that my SIA and the submissions received provide evidence that the polarisation identified in the Independent Hearing Panel's (IHP) 2022 decision remains and therefore it is her opinion that those effects are likely to be low to moderate (Paragraph 119).

7.13 Based on the submissions, I do agree that there may be some impacts associated with the stability of the local neighbourhood (particularly for neighbours) due to the changes they are experiencing (such as sense of place and people moving) and the uncertainty of the duration of the activity at each site. However, my assessment identifies that impacts on the stability of the community are limited to a small subset of the community, and it is not permanent. There is no requirement for the local and wider community to move, but I acknowledge that some submissions and interviews report that experience of some effects may have contributed (amongst other factors) to moving out of the area. Therefore, I conclude that there are likely to be low negative impacts on the stability of the local neighbourhood.

Assessment of social equity outcomes

7.14 Ms. Foy outlines (Paragraph 129) that my SIA mainly focuses on the positive effects of providing housing for vulnerable people, but other than

describing the community composition and respondents to surveys by demographic variables, there is little consideration of the types of community members who are affected by the adverse effects of CEH motels.

- 7.15 Ms. Foy does acknowledge (Paragraph 130) that this would be difficult to do whilst maintaining confidentiality due to such small survey samples, and that there were a range of submitters from different demographic groups who experienced adverse effects that presented at the 2022 hearing.
- 7.16 I agree with Ms Foy that attributing assessment of equity of specific groups of community members without sufficient data is difficult (Paragraph 130). It is my opinion that the distribution of effects is largely in relation to proximity, rather than to a specific group within the community. In addition, I consider that some members of the community may feel more intimidated by some residents than others, depending on personal circumstances and, as a result, may make greater changes to their way of life.

Mitigation and conditions

- 7.17 In relation to the proposed conditions of consent, Ms. Foy considers that further work needs to be done to ensure more proactive engagement with neighbours to work together to find solutions that reduce the level of incidents they experience (Paragraph 131).
- 7.18 However, she also states that she questions whether this can be achieved given the very low response rates to the neighbour survey and considers that the operative conditions provide sufficient mechanisms to deliver feedback (Paragraph 131). She also suggests that affected parties reach out to individual motels or HUD if they have problems and seek to identify appropriate remedies (Paragraph 95).
- 7.19 I agree with Ms. Foy's assertion that the operative conditions provide a sufficient mechanism to deliver feedback. However, it is my opinion that survey response rates are not a direct reflection of the willingness to engage, and I consider that communication is required to reach a solution where there are identified issues. This could be facilitated by the operators inviting neighbours to one to one meetings to discuss any

issues, which could be provided for and actioned as part of the existing conditions.

8 Submissions

8.1 I have reviewed the submissions for the seven applications. I have grouped the points raised by submitters into themes and respond to these in turn below.

8.2 I consider that most issues raised by submitters (relevant to the scope of the SIA) have been addressed in my assessment and the above summary of findings. To limit repetition, I have provided brief commentary on these and subsequently focus on points of clarification and matters not already assessed.

Way of life and fears of safety

8.3 Many submitters raised that anti-social behaviour and crime has increased in Rotorua since motels were used to provide emergency housing¹. Submitters raised issues with increased anti-social behaviour and crime in general across Rotorua. Where specific areas were mentioned, these included:

- (a) Theft, begging and aggression/intimidation in the CBD;²
- (b) Anti-social behaviour, car break-ins, car theft and trespassing³ in surrounding residential areas;⁴

¹ #1 Sylvia Phillips; #2 Jennifer Peace; #3 Pamela Foyle; #4 Craig Robert Littlejohn; #5 Kael Terama McEnteer; #6 Reynold Macpherson on behalf of Rotorua District Residents and Ratepayers; #11 Kimberley Ward; #12 Restore Rotorua c/o Holland Beckett Law; #13 Deborah Elizabeth Haley; #14 Donnarae Raukawa-Doughty; #15 Watu Mihinui, James Warbrick & Manuariki Tini; #16 Tanya Robinson on behalf of Whakarewarewa – The Living Māori Village; #17 Mark Alistair Oxley; #18 Logan Okiwi Shipgood and Dianna Raukawa Doughty – Penny Haka Gallery; #19 Beatrice Ann Hodgkiss; #21 Inus Rademeyer on behalf of Hotel Council Aotearoa - Rotorua Region Hotels; #22 Robert Bagnall; #25 Nuki Nicholson; #26 Leila Constantino; #27 Wayne Bacon; #29 David Alexander McPherson; #32 Chantel Limited; #33 Jian Shu Qiu Family Trust; #34 Bright Rose Trust; #36 Ian Blackman.

² #1 Sylvia Phillips; #7 Steven Bibby; #19 Beatrice Hodgkiss; #21 Inus Rademeyer on behalf of Hotel Council Aotearoa - Rotorua Region Hotels

³ Mr Bibby refers to social media reports of repeated trespassing incidents where people jumped neighbour's fence to enter the CEH site. This was in relation to a Contracted Emergency Housing motel currently operating that is not part of this application

⁴ #7 Steven Bibby; #12 Restore Rotorua c/o Holland Beckett Law; #22 Robert Bagnall

- (c) Illegal activity, loitering, and disruptive behaviour in Whakarewarewa Village carpark;⁵
- (d) Anti-social and disruptive behaviour including fights near the motels in Whakarewarewa during staff arrival and departures.⁶

- 8.4 Submitters also raised concerns of a decline in public safety across Rotorua, in the CBD and in neighbourhoods surrounding CEH⁷.
- 8.5 Some submitters reported that this increase in anti-social behaviour and crime had resulted in changes to the way they lived their lives or disrupted the quality of living environments. Ms Ward⁸ reported that she doesn't walk along Fenton St anymore due to fears of being accosted or injured. Ms Tetenburg noted that she is more vigilant when driving and getting out of the car⁹. While other submitters referenced general disruption of the safety and enjoyment of surrounding residential areas.
- 8.6 Concerns with increased anti-social behaviour and crime were also reported in stakeholder interviews and the community and neighbour surveys completed as part of the SIA and summarised in section 5 of the SIA. I consider that impacts on way of life arising from this have been appropriately considered and assessed in my assessment.
- 8.7 For submissions that reported a general increase in crime and anti-social behaviour it is difficult to ascertain where these occurred in relation to the CEH sites subject to this application. Many reported an increase since emergency housing motels had been operating and referenced incidents occurring over the past few years.
- 8.8 As I concluded in the SIA, the way some community members live their lives continues to be affected by incidents of anti-social behaviour and crime, however, issues with anti-social behaviour and crime in the

⁵ #15 Watu Mihinui, James Warbrick, Manuariki Tini; #16 Tanya Robinson on behalf of Whakarewarewa – The Living Māori Village; #18 Penny Haka Gallery – Logan Shipgood and Dianna Raukawa Doughty

⁶ #36 Ian Blackman

⁷ #2 Jennifer Peace; #5 Kael McEnteer; #7 Steven Bibby; #16 Tanya Robinson on behalf of Whakarewarewa – The Living Māori Village; #17 Mark Oxley; #18 Penny Haka Gallery- Logan Shipgood and Dianna Raukawa-Doughty; #24 Trevor Newbrook; #25 Nuki Nicholson; #26 Leila Constantino; #29 David Alexander McPherson; #30 Jarra McEnteer; #32 Chantel Limited; #33 Jian Shu Qiu Family Trust; #34 Bright Rose Trust; #36 Ian Blackman

⁸ #11 Kimberley Ward

⁹ #23 Susan Tetenburg

community at large is not directly attributable to CEH. I acknowledge these experiences of submitters and other community members and note that these are serious issues but are part of a wider and more complex set of social factors.

Tourism character

- 8.9 Submitters also raise concern with ongoing damage to Rotorua's reputation as an attractive destination due to the presence/concentration of CEH sites in prominent areas, antisocial behaviour and crime¹⁰.
- 8.10 Some submitters raised specific concern for the tarnishing of Whakarewarewa Village's reputation with visitors departing earlier than they used to and gaining the perception that this is an unsafe area¹¹. Ms Raukawa-Doughty's submission notes the loss of a local business in the village with the closure of Penny Haka Gallery (located next to Apollo motel) for the past 18 months said to be due to continued anti-social behaviour outside.
- 8.11 This is discussed and assessed in the SIA. It appears that for international visitors the presence of CEH motels is less obvious as they are less likely to be aware or looking for it. The domestic market may be more aware and may have seen the media reporting of the issues. The conditions and inspections on the maintenance of sites and efforts to reduce the visibility of sites have improved the impact of CEH on tourist amenity. Issues arise when there is mixed use (which is not the case for motels used for CEH) or experience of anti-social behaviours. I remain of the opinion that ceasing to operate CEH motels does not necessarily improve the tourism character, as this will depend on maintenance and future use of sites, upgrades in the area and antisocial behaviour in high trafficked areas.

¹⁰ Sylvia Phillips; Jennifer Peace; Reynold MacPherson on behalf of Rotorua District Residents and Ratepayers; Steven Bibby; Tracey McLeod; Donald Paterson; Kimberley Ward; Holland Beckett Law; Deborah Elizabeth Haley; Tanya Robinson on behalf of Whakarewarewa – The Living Māori Village; Beatrice Ann Hodgkiss; Inus Rademeyer on behalf of Hotel Council Aotearoa – Rotorua Region Hotels: Arawa Park Hotel, Copthorn Hotel Rotorua, Distinction Hotel Rotorua, JetPark Hotel Rotorua, Millennium Rotorua, Novotel Rotorua, On The Point, Pullman Rotorua, Regent of Rotorua, Rydges Rotorua, Sudima Rotorua; Susan Tetenburg; Watu Mihinui, James Warbrick & Manuariki Tini; Nuki Nicholson; Donald Paterson; Leila Constantino; David MacPherson; Chantel Limited; Jian Shu Qiu Family Trust

¹¹ #15 Watu Mihinui, James Warbrick and Manuariki Tini; #14 Donnarae Raukawa-Doughty and #18 Penny Haka Gallery- Logan Okiwi Shipgood and Dianna Raukawa-Doughty; #16 Tanya Robinson on behalf of Whakarewarewa – The Living Māori Village; #25 Nuki Nicholson; #26 Leila Constantino; Teresa and Walter Scheer TeWa Investments Trust

Residential character

- 8.12 Submitters raised ongoing issues with shopping trolleys refilled with rubbish and left on the street near to the motels and outside their properties¹². Issues with shopping trolleys have been raised in Community Liaison Group meetings and by interviewees and survey respondents. This was considered in the SIA.
- 8.13 It was noted from conversations with motel operators as part of the SIA that they were conscious of shopping trolleys and made a concerted efforts to return these in a timely manner even though it is not necessarily residents of CEH that had left them. I understand that there are ongoing conversations between Council and supermarket retailers about the management of this. I also note that in her evidence, Ms Barry acknowledges the current CEH sites high level of compliance with the conditions of consent, including keeping the streetscape and berms tidy. Ms Barry states that during her formal and informal inspections it was rare that a shopping trolley was located directly outside a CEH site.
- 8.14 Mr Littlejohn¹³ submits that “the visual decline of the areas around the motels has marginally improved but not enough”. This opinion was shared by others interviewed as part of the SIA and as noted in the SIA, interviewees and survey respondents had different opinions on whether the visual amenity of neighbourhoods surrounding CEH had improved over the last two years.
- 8.15 Two submitters noted inability or difficulty to find tenants for their rental properties that were near to Apollo and RotoVegas motels.
- 8.16 I accept that this is an issue and has a financial and potentially emotional impact on those property owners. However, I note that when the sites are operating as CEH, they have been required to uphold standards of maintenance and subject to inspections as per the conditions of consent. As noted above, in her evidence Ms Barry acknowledges the high level of compliance with these conditions to date during formal inspections but also when she informally passes the sites. In respect to visual amenity, it

¹² #1 Sylvia Phillips; #4 Craig Littlejohn; #8 Tracey McLeod; #19 Beatrice Hodgkiss; #22 Robert Bagnall

¹³ #4 Craig Littlejohn

is my observation that CEH are an improvement in comparison to other motels in the area than remain empty or are in states of disrepair.

Community services

- 8.17 Some submitters raised that CEH has placed increased pressure on hospitals, GPs, mental health services, police, education.¹⁴
- 8.18 As explained in the SIA, CEH serves a population that often (though not always) have high health and social service needs. CEH motels may concentrate people to one location and therefore localised services may have increased pressure to meet the needs of this population. However, these people would need to access these services wherever they lived in Rotorua.
- 8.19 Through the onsite support providers CEH helps to reduce barriers for residents to access services and encourage health seeking behaviour within a population that is historically underserved and disconnected. Whether collectively concentrated in stable accommodation, housed throughout the city or transient these members of the community would continue to have the same complex needs that would need to be addressed but may not have the support to access these. Traditionally, outreach services and specialised health and education teams have been required to address the needs of the transient populations in cities.
- 8.20 Mr Ngatai¹⁵ raised negative social effect of students from these motels enrolling at the local high school he teaches at. School principals spoken with as part of the SIA identified that students living in CEH motels often required more time and resources to support them.
- 8.21 In the SIA, I state that without the additional resources and support services required to meet the needs of those with more complex education needs there may be additional pressure on schools. CEH motel support services assist to provide some of that support.

Community cohesion

¹⁴ #1 Sylvia Phillips; #11 Kimberley Ward; #13 Deborah Haley; #17 Mark Oxley; #19 Beatrice Hodgkiss; #23 Susan Tetenburg, #35 Guy Ngatai

¹⁵ #35 Guy Ngatai

- 8.22 I acknowledge that this application for consent to operate until December 2025 and the lack of clarity on when each CEH will close has resulted in uncertainty and frustration for some submitters.
- 8.23 Ms Raukawa-Doughty¹⁶ expressed concern at the number of CEH motels (Apollo, Pohutu and Alpin) and in turn the high number of CEH residents remaining in the small area surrounding Tyron Street in Whakarewarewa village. Ms Raukawa-Doughty also stated that she has not been able to tenant her apartment “due to the presence of neighbours next door” and their behaviour, suggesting that this is likely to continue while emergency housing operates next door.
- 8.24 I acknowledge that the population within Whakarewarewa is smaller compared to Glenholme and therefore CEH residents would form a higher proportion of residents within this area.
- 8.25 I do agree that there may be some impacts associated with the stability of the local neighbourhood (particularly for neighbours) due to the disruption they are experiencing and the uncertainty of the duration of the activity at each site¹⁷. However, as discussed in paragraph 7.13 of this evidence my assessment identifies that this upheaval is limited to a small subset of the community, and it is not permanent. There is no requirement for the local and wider community to move, but I acknowledge that the experience of some effects may mean that moving out of the area is preferred; or in the case of Ms Raukawa-Doughty’s submission, moving into the area may not be as desirable.
- 8.26 Therefore, I remain of the opinion that there are likely to be low negative impacts on the stability of the local neighbourhood due to disruption experienced and the uncertainty of the duration of CEH at each site.

Political systems

- 8.27 Some submitters also voiced their concern with the lack of trust and transparency of agencies involved in CEH. In the SIA, I acknowledge that there are tensions and mistrust between some members of the community and that there have been issues with communication between parties.

¹⁶ #14 Donnarae Raukawa-Doughty

¹⁷ For example #20 Carolyne Hall

9 Conclusion

- 9.1 Overall, my position as outlined in the SIA remains unchanged. There are both positive and adverse social impacts of the provision of CEH and the applications but I consider that the proposed conditions on site amenity and the Community Liaison Group (subject to continued review) can appropriately manage these.
- 9.2 Proximity to the CEH motels increases the potential severity and likelihood of negative social impacts for local community members, in particular for neighbours who have experienced adverse impacts on way of life, health and wellbeing and the amenity of their living environment. While CEH does not *cause* anti-social behaviour it does by nature of its operation and number of residents increase the likelihood of exposure to these events.
- 9.3 CEH provide positive social impacts for the members of the community they serve by providing stability, shelter and support services. These positive impacts are significant compared to the alternatives available at the current time. If CEH was not provided for this would have negative impacts on CEH residents and is likely to increase demand for Emergency Housing Special Needs Grants from Ministry of Social Development which in my view have greater adverse social impacts than CEH.

Date: 22 October 2024



Joanne Healy

