

Plan Change 10 to the Rotorua District Plan – Definitions and Rule Refinements

Index to Further Submissions

Further Submission #	Submitter #	Submitter Name	Page
1	28	Te Tūapāpā Kura Kāinga – Ministry of Housing and Urban Development	1
2	23	Kāinga Ora – Homes and Communities	21
3	24	Ara Poutama Aotearoa – The Department of Corrections	26
4	25	Hao Boutique Hotel Group	33
5	22	McKenzie and Co. Consultants Limited.	41



20 April 2026

Te Tūapāpā Kura Kāinga
Ministry of Housing and Urban Development
Further submission on Rotorua Lakes Council Proposed
Plan Change 10: Definitions and Rule Refinements
Clause 8 and 8A of Schedule 1 to the Resource Management Act 1991

To: Rotorua Lakes Council

By email via: policy.planning@rotorualc.nz

Name of further submitter: **Te Tūāpāpā Kura Kainga - Ministry of Housing and Urban Development (HUD)**

1. This is a further submission by Te Tūāpāpā Kura Kāinga Ministry of Housing and Urban Development (HUD) on Rotorua Lakes Council (RLC) Proposed Plan Change 10: Definitions and Rule Refinements (PC10).
2. HUD has an interest in PC10 greater than the interest the general public, given its role as the central government primary advisor on housing and urban development.
3. HUD supports or opposes submission points on PC10 as outlined in this further submission.

HUD leads the New Zealand Government’s housing and urban development work programme

4. HUD is central government’s primary advisor on housing and urban development. We provide advice on system strategy, policy, and regulation, and we fund a range of programmes to deliver housing and urban development outcomes in areas of greatest need. We regulate community housing providers through the Community Housing Regulatory Authority (a part of HUD), monitor the performance of Kāinga Ora, and



collect data and insights to inform decisions and monitor progress towards long-term outcomes.

5. HUD leads advice on and delivery of the Government's Going for Housing Growth agenda, where we work with other agencies and our stakeholders to address the underlying causes of the housing crisis. As part of this, we co-lead urban planning policy and regulation in the resource management system with the Ministry for the Environment and co-lead policy development with the Ministry of Social Development to ensure those most in need of housing can access options like emergency and transitional housing.
6. As the steward of the housing and urban development system with the policy responsibilities outlined above, HUD has a particular interest in whether and how PC10 will enable these outcomes, and more broadly an interest in whether and how PC10 will enable housing support and supply to be delivered.

HUD's interest and involvement in housing in Rotorua

Rotorua Housing context

7. Following a period of rapid population growth and insufficient housing supply, Rotorua experienced a housing shortage. RLC has previously acknowledged that decades of low population growth meant its District Plan was not adequately kept up to date and was too restrictive, contributing to an inadequate supply response. Infrastructure constraints and additional costs of development due to geotechnical issues also contributed.
8. In addition to planning and infrastructure constraints, incentives to build housing in Rotorua have not been strong due to poor development economics. Where house prices on the market are below the cost of construction, increased demand causes house prices and rents to rise until new homes are priced competitively compared to existing ones.
9. The growing shortage of homes had several negative effects over time. The number of houses available to rent reduced. The tightening in the Rotorua rental market caused rents to rise relative to incomes. In addition to increased financial stress from higher rental costs, the shortfall in housing also increased the number of households living in a



crowded situation. Declining rental affordability flowed through into increased numbers on the housing register, which increased from 103 applicant households in mid-2017 to a peak of over 1,100 households in mid-2022. Applicants on the housing register per 10,000 population were in line with the rest of the country until 2019, when they rapidly diverged.

10. The shortage of housing and resulting poor rental affordability and availability eventually flowed through into significant numbers of households in various forms of temporary, emergency housing. At the recent peak of usage in December 2021, there were 699 households in emergency housing (receiving Emergency Housing Grants (EHG)), Contracted Emergency Housing (CEH), transitional housing motels, and HUD contracted COVID-19 response motels).

The Rotorua Housing Taskforce and Emergency Housing

11. The Rotorua Housing Taskforce (the Taskforce) was established in March 2021. The Taskforce was a collaborative partnership of RLC, the Ministry of Social Development (MSD), HUD, Kāinga Ora, Te Puni Kōkiri, Te Arawa, and various service providers. The aim of the Taskforce was to develop immediate short-term solutions to improve the environment for whānau receiving EHG and the wider community, while more permanent housing solutions were developed. The Action Plan recommended by the Taskforce and agreed by Cabinet in May 2021 included:
 - a) HUD contracting suitable motels specifically for emergency accommodation with an initial focus on whānau with children.
 - b) wrap-around social support services for whānau and children in contracted accommodation, and improved support for people in motels receiving an EHG.
 - c) a new community-led housing hub – Te Pokapū – including a collective of social services, iwi, and agencies. The core function of Te Pokapū was to triage, assess, and where necessary place people into CEH, or refer people to agencies and services.
12. The approach recommended by the Taskforce and agreed by the Government was a bespoke solution responding to the problems identified in Rotorua for whānau and children in emergency housing.



13. Unfortunately, the RLC District Plan did not provide any suitable planning pathway for that solution – the provisions of basic, safe accommodation for vulnerable people during a period of acute housing stress. The upshot of this was a lengthy, costly resource consent process with substantial regulatory friction. At the time of HUD’s initial applications for resource consent to operate 13 motels as CEH, it was anticipated that the scale of Rotorua’s housing crisis would require a multi-year timeframe to overcome - up to five years - however, consent was only granted for a two-year period. This meant HUD had to go through another resource consent process in 2024 seeking consent for a further year. HUD exited all CEH motels by December 2025.
14. The Taskforce was succeeded in December 2022 by the Rotorua Housing Accord (the Accord), which aimed to bring together central and local government with Te Arawa and Ngāti Whakaue to address Rotorua’s housing crisis. The Accord was focused on issues relating to the wellbeing of those in temporary housing and effects on the wider community, and on expanding Rotorua’s housing supply. One of RLC’s priorities at the time was reducing the number of Emergency Housing motels on Fenton Street. As part of this, MSD in consultation with RLC focused emergency housing motels to other locations.

Plan Change 9

15. HUD commends RLC for notifying RLC Plan Change 9: Housing for Everyone on 20 August 2022. The plan change was required under the National Policy Statement on Urban Development 2020 (NPS-UD) and adopted the Medium Density Residential Standards (MDRS). Following a request by RLC, Te Tatau o Te Arawa and Te Arawa Lakes, in February 2022 the Government, via an Order in Council, required RLC to incorporate the MDRS and to use the Intensification Streamlined Planning Process. The MDRS provisions incorporated within Plan Change 9 significantly increased the development opportunities for housing across the Rotorua urban area, including for higher density housing.

Government investment in Rotorua and partnership achievements

16. Complementing RLC’s Plan Change 9, the Government has heavily invested in enabling infrastructure and housing in Rotorua. This includes:



- a) \$84.6m through the Infrastructure Acceleration Fund to improve stormwater capacity in Rotorua’s central and western areas. According to RLC estimates this investment will enable around 1,765 and 1,320 dwellings in those areas, respectively.¹
 - b) This was in addition to the shovel ready investment of \$55m committed in July 2020. This investment in State Highway 30 and other key enabling infrastructure works will enable future stages of the Ngāti Whakaue Tribal Lands development at Wharenui Rise (around 1100 homes over time). The improvements, through to Wharenui Road, will address key transport constraints to future stages of Ngāti Whakaue Tribal Lands Wharenui Rise development.
 - c) \$20m committed to RLC for other enabling infrastructure for Wharenui Rise. This included \$5m for local roading improvements and \$15m for sewerage and stormwater infrastructure.
 - d) A net increase of over 900 housing places since March 2021.²
17. This represents a serious, concerted effort to address Rotorua’s housing crisis. The expansion of Social Housing places contributed significantly to reducing the number of households needing emergency housing – which has decreased from over 700 households in March 2022 to 21 as at the end of March 2026.
18. Further to this, HUD has worked alongside RLC, iwi and other community agencies in the allocation of 150 additional social housing places to be delivered in Rotorua through a new community-led approach. This involved HUD participating and contributing to the Rotorua Housing plan through the Rotorua Housing Plan Advisory Group.
19. In addition to the 150 social housing places allocated through the community-led approach, there is a pipeline of an additional 510³ housing places to be delivered in the coming years.

¹ Retrieved from: [RLC receives almost \\$85m from Govt Infrastructure Acceleration Fund - Rotorua Lakes Council](#)

² 900 housing places delivered consists of Social Housing, Transitional Housing, Affordable rentals, Progressive Homeownership homes.

³ 660 pipeline consists of Social Housing, Transitional Housing, Affordable rentals, Progressive Homeownership homes and market homes enabled through HUD’s Land for Housing programme.



20. The housing situation in Rotorua has made great gains over several years. This has been achieved through partnerships between local and central government, iwi, and other community agencies. However, while HUD supports the intention of RLC's PC10 which aims to improve clarity, consistency and usability of the Operative Rotorua District Plan, HUD is concerned that the proposed change makes little progress in planning for temporary and emergency housing in Rotorua. This is despite HUD making it clear through the resource consenting process for CEH that there will always be a need for other forms of temporary emergency housing in Rotorua as households' circumstances can change at different points (for example, because of job losses or relationship breakdowns). Limited temporary housing options are required as it will otherwise mean households will be left in precarious circumstances, needing to find interim arrangements (such as overcrowding into existing homes) or becoming homeless.
21. HUD is concerned that some proposed changes are not effects-focused, but based on the legal status of residents, and are not for a valid Resource Management Act purpose.
22. Also, some proposed changes will require housing providers to go through lengthy and costly resource consent processes, inhibiting the Government's ability to provide housing support to vulnerable cohorts quickly. This would put more pressure on the housing system and could result in increased rough sleeping. It would also not be a good use of taxpayer or ratepayer funds.

Overview of HUD's further submission on Plan Change 10

23. Submitters on PC10 have raised submission points that HUD either supports or opposes (including in part). HUD's submission is entirely framed in relation to those specific submission points (as per attached Table One), but a summary is provided here.
24. HUD supports RLC's stated intentions for PC10, a technical plan change, intended to improve clarity and consistency. However, HUD is concerned PC10 has unintended consequences that will inappropriately impact the provision of emergency, transitional and supported housing. This is particularly when viewed against HUD's recent (2022-2024) experience with resource consents for CEH in Rotorua. Relevant also is the NPS-UD (the national direction to enable housing supply and access), and the limits of district plan regulation under the Resource Management Act 1991 (RMA).



25. HUD considers PC10 seeks to manage complex social and public-order issues through land-use planning mechanisms, in circumstances where the s32 analysis does not demonstrate locality-specific environmental effects, and where other legislative and regulatory systems (justice, health, building, social services) are more appropriately equipped to address the issues identified.

Summary – relevant to HUD’s further submission points as set out in Table One

Re-categorisation of emergency housing (a social matter) as a planning matter, which is not a relevant effects-based approach

26. HUD notes that PC10 relies heavily on the s32 report’s conclusion that emergency housing is a “residential activity” rather than visitor accommodation but then uses that conclusion to justify more restrictive activity statuses without demonstrating or providing evidence of different or greater environmental effects than other residential or visitor uses.
27. HUD’s further submission highlights that the s32 report acknowledges subjective judgement and interpretation difficulties yet proposes provisions that heighten consenting triggers and notification risk. HUD also considers that supported and emergency housing is treated as a land-use planning issue despite its effects often being operational or behavioural, not land-use based.

Inconsistency with effects-based planning and risk of ultra vires provisions

28. HUD aligns with submission points (Kāinga Ora and Ara Poutama Corrections) that introducing reference to “public safety” into residential objectives, and differentiating housing based on who lives there rather than how it functions, moves the District Plan away from effects-based resource management and into people-based regulation, which is not supported by the RMA. HUD also notes that the s32 report does not include locality-based evidence connecting supported and emergency housing to increased adverse effects on the environment.
29. This raises legal risk (ultra vires), a lack of certainty, inconsistency in decision-making, and exposure to human rights and discrimination concerns, particularly where justice-system status (“people subject to legal orders”) is indirectly regulated through planning tools.



Over-reliance on generic “catch-all” rules for residential activities

30. HUD’s further submission consistently supports submission points opposing RESZ-R8A, COMZ-R33A, CCZ-R17A and similar “other residential activities” rules, and the defaulting of unspecified residential activities to discretionary or non-complying status.
31. The concern is that these provisions capture ordinary residential activities inadvertently, reduce certainty (contrary to PC10’s stated purpose), and especially in combination with the introduction of “public safety” into objectives, undermine housing supply and responsiveness, especially for non-standard or supported housing models. These unintended consequences undermine the national direction HUD administers and which is intended to enable housing supply and access – the NPS-UD.

Disproportionate consenting burden and disproportionate public notification risk

32. Drawing on Rotorua’s CEH resource consent history, HUD’s further submission highlights that discretionary or non-complying status raises disproportionate risk of public notification (especially with the proposed introduction of “public safety” into objectives). Public – and limited - notification has previously amplified community opposition unrelated to legitimate environmental effects. This materially delays or frustrates the provision of urgent housing support to vulnerable people when they most need it.
33. HUD questions the evidential basis for determining that the effects of a boarding house or motel used for emergency housing would be any different to other forms of visitor or residential accommodation, where the s32 report provides no quantifiable or significant locality-based analysis.

Tension with national direction and access to housing to all people

34. Given HUD’s role as leader of the housing and urban development system, we explicitly reference the NPS-UD. The NPS-UD requires that planning frameworks enable housing supply, support well-functioning urban environments, and ensure all people can access safe and secure housing.
35. HUD’s further submission points to a structural imbalance in PC10 where visitor accommodation is enabled and clarified while supported and emergency housing faces



higher regulatory thresholds, greater discretion, and more uncertainty. This despite there being no locality-based evidence in the s32 report confirming the difference in environmental effects between visitor accommodation and supported or emergency housing. This imbalance risks worsening housing insecurity and disproportionately affecting whānau Māori and vulnerable communities.

Objective 1 – NPS-UD 2020 (updated May 2022)

Under **Part 2: Objectives and policies**, **Objective 1** states (emphasis added):
“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 1, Part 2.1)

HUD wishes to be heard in support of its further submission

- 36. HUD seeks to be heard in support of its further submission.
- 37. HUD will consider presenting a joint case with other parties at the hearing.

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Ministry of Housing and Urban Development

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TABLE ONE – MINISTRY OF HOUSING AND URBAN DEVELOPMENT FURTHER SUBMISSION ON ROTORUA LAKES COUNCIL PROPOSED PLAN CHANGE 10

SUBMITTER NAME	SUB POINT #	TOPIC	PLAN REFERENCE	SUBMITTER POSITION	SUBMISSION POINT SUMMARY	SUBMITTER'S RELIEF SOUGHT	HUD FURTHER SUBMISSION
Stratum Consultants Ltd	S_12.01	01. Tourist Accommodation Definition	Interpretation	Amend or support in part	Supports adopting the National Planning Standards definition of "Visitor Accommodation," except to the extent necessary to expressly exclude "Bed and Breakfast" and "Holiday Rental Accommodation."	Support the change to the definition of visitor accommodation.	<p>HUD opposes this submission point in part.</p> <p>HUD supports the intent of Plan Change 10 (PC10) to improve clarity and consistency by aligning definitions with the National Planning Standards. However, HUD opposes these submission points to the extent they do not address the practical and regulatory consequences of the definition change for emergency and supported housing.</p> <p>The replacement of "Tourist Accommodation" with "Visitor Accommodation" has the effect of recategorising motels and boarding houses used for emergency housing as residential activities. This change is then relied upon to justify more restrictive activity statuses under residential rules, including discretionary and non-complying pathways. HUD is concerned that this outcome is not supported by any analysis demonstrating that emergency or supported housing generates different or greater environmental effects than other visitor or residential accommodation – to the extent that requires more restrictive activity status. Other options such as performance standards should be considered.</p> <p>HUD notes that the Section 32 Report acknowledges that applying the definition of visitor accommodation requires subjective judgement, yet the proposed provisions increase regulatory triggers, consenting complexity, and the likelihood of public notification. Based on HUD's recent experience in Rotorua, this approach creates high regulatory friction, delay, and uncertainty when responding to acute housing need. HUD further considers that PC10 results in an imbalance, where visitor accommodation is enabled and clarified, while emergency and supported housing is exposed to higher regulatory thresholds and discretion, without locality-specific evidence justifying that differential treatment. This outcome risks inhibiting the Government's ability to provide timely housing support to vulnerable households and is inconsistent with national direction to enable housing supply and access.</p>
Kāinga Ora – Homes and Communities	S_23_04	01. Tourist Accommodation Definition	Interpretation	Support	Supports the amendments to the definition of 'visitor accommodation,' noting that this is in line with the National Planning Standards.	Retain the definition of 'visitor accommodation,' as notified.	<p>HUD opposes this submission point in part.</p> <p>HUD supports the intent of Plan Change 10 to improve clarity and consistency by aligning definitions with the National Planning Standards. However, HUD opposes these submission points to the extent they do not address the practical and regulatory consequences of the definition change for emergency and supported housing.</p> <p>The replacement of "Tourist Accommodation" with "Visitor Accommodation" has the effect of recategorising motels and boarding houses used for emergency housing as residential activities. This change is then relied upon to justify more restrictive activity statuses under residential rules, including discretionary and non-complying pathways. HUD is concerned that this outcome is not supported by any analysis demonstrating that emergency or supported housing generates different or greater environmental effects than other visitor or residential accommodation – to the extent that requires more restrictive activity status. Other options such as performance standards should be considered.</p> <p>HUD notes that the Section 32 Report acknowledges that applying the definition of visitor accommodation requires subjective judgement, yet the proposed provisions increase regulatory triggers, consenting complexity, and the likelihood of public notification. Based on HUD's recent experience in Rotorua, this approach creates high regulatory friction, delay, and uncertainty when responding to acute housing need. HUD further considers that PC10 results in an imbalance, where visitor accommodation is enabled and clarified, while emergency and supported housing is exposed to higher regulatory thresholds and discretion, without locality-specific evidence justifying that differential treatment. This outcome risks inhibiting the Government's ability to provide timely housing support to vulnerable households and is inconsistent with national direction to enable housing supply and access.</p>
Hao Boutique Hotel Group	S_25_01	01. Tourist Accommodation Definition	Interpretation	Amend or support in part	Support the intent of the change to the new Visitor Accommodation definition. They note it will provide greater clarity by removing ambiguous terms to recognise visitor accommodation as being distinct from boarding houses and private hotels. It will help re-focus Visitor Accommodation as being an activity that supports and strengthens Rotorua as a premier tourism destination by contributing to economic growth, cultural vibrancy, and visitor experience.	Retain as proposed, but with amendment to the definition to include a range of example ancillary activities that are covered by the definition.	<p>HUD opposes this submission point in part.</p> <p>HUD supports the intent of Plan Change 10 to improve clarity and consistency by aligning definitions with the National Planning Standards. However, HUD opposes these submission points to the extent they do not address the practical and regulatory consequences of the definition change for emergency and supported housing.</p> <p>The replacement of "Tourist Accommodation" with "Visitor Accommodation" has the effect of recategorising motels and boarding houses used for emergency housing as residential activities. This change is then relied upon to justify more restrictive activity statuses under residential rules, including discretionary and non-complying pathways. HUD is concerned that this outcome is not supported by any</p>

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							analysis demonstrating that emergency or supported housing generates different or greater environmental effects than other visitor or residential accommodation – to the extent that requires more restrictive activity status. Other options such as performance standards should be considered. HUD notes that the Section 32 Report acknowledges that applying the definition of visitor accommodation requires subjective judgement, yet the proposed provisions increase regulatory triggers, consenting complexity, and the likelihood of public notification. Based on HUD's recent experience in Rotorua, this approach creates high regulatory friction, delay, and uncertainty when responding to acute housing need. HUD further considers that PC10 results in an imbalance, where visitor accommodation is enabled and clarified, while emergency and supported housing is exposed to higher regulatory thresholds and discretion, without locality-specific evidence justifying that differential treatment. This outcome risks inhibiting the Government's ability to provide timely housing support to vulnerable households and is inconsistent with national direction to enable housing supply and access.
Stratum Consultants Ltd	S_12_02	02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	RESZ-07, RESZ-O14, RESZ-O17	Oppose	Opposes the proposed insertion of "public safety" into the relevant objectives and policies. Notes the term is ambiguous and lacks clear parameters for assessment within a resource management context. There is no reliable or objective mechanism to assess how future occupants of a property may behave, nor is it appropriate for land use planning provisions to attempt to regulate individual behaviour in this manner. Introducing such terminology risks subjective interpretation and inconsistent application, without delivering tangible planning outcomes.	The submitter requests that Council removes the reference to "public safety in objectives RESZ-07, RESZ-O14 and RESZ-O17	HUD supports this submission point opposing the inclusion of "public safety" within residential objectives. HUD considers that introducing "public safety" shifts the focus of the District Plan away from effects-based resource management and into matters relating to the perceived characteristics or legal status of occupants. These are not matters that can be reliably assessed through land-use planning provisions and are more appropriately addressed through other regulatory and social service systems. HUD is concerned that the inclusion of "public safety" in these objectives creates legal risk, including the risk that the provisions are ultra vires under the Resource Management Act. It also introduces a high degree of subjectivity and inconsistency into decision-making, as there is no clear or objective mechanism for assessing public safety outcomes through a resource consent process. Further, HUD considers that these provisions raise human rights and discrimination concerns, particularly where housing activities may be treated differently based on who lives there, rather than how the activity functions or the environmental effects it generates. HUD supports the submission points seeking deletion of "public safety" references in residential objectives to retain an effects-based, lawful, and certain planning framework.
Kāinga Ora – Homes and Communities	S_23_05	02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	RESZ-07, RESZ-O14, RESZ-O17	Oppose	Opposes the inclusion of "public safety" in objectives RESZ-07; RESZ-O14; RESZ-O17 as it shifts the focus away from environmental effects and into matters relating to the perceived characteristics or legal status of occupants, which are not Resource Management Act considerations. Public safety concerns relating to individuals subject to custodial or community-based orders are justice-system matters, not environmental effects and including them invites discriminatory decision-making based on who lives or may live in community housing rather than how the activity functions. This risks introducing human-rights implications into a District Plan provision that should remain effects-based. Therefore, Kāinga Ora seeks that the reference to public safety in objectives RESZ-07; RESZ-O14; RESZ-O17 be deleted.	Delete reference to 'public safety' in RESZ-07; RESZ-O14; RESZ O17, retaining the wording as currently operative.	HUD supports this submission point opposing the inclusion of "public safety" within residential objectives. HUD considers that introducing "public safety" shifts the focus of the District Plan away from effects-based resource management and into matters relating to the perceived characteristics or legal status of occupants. These are not matters that can be reliably assessed through land-use planning provisions and are more appropriately addressed through other regulatory and social service systems. HUD is concerned that the inclusion of "public safety" into these objectives creates legal risk, including the risk that the provisions are ultra vires under the Resource Management Act. It also introduces a high degree of subjectivity and inconsistency into decision-making, as there is no clear or objective mechanism for assessing public safety outcomes through a resource consent process. Further, HUD considers that these provisions raise human rights and discrimination concerns, particularly where housing activities may be treated differently based on who lives there, rather than how the activity functions or the environmental effects it generates. HUD supports the submission points seeking deletion of "public safety" references in residential objectives to retain an effects-based, lawful, and certain planning framework.
Ara Poutama Aotearoa- Department of Corrections	S_24_02	02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of	RESZ-07, RESZ-O14, RESZ-O17	Oppose	Disagrees "community housing" should be described as a "non-residential" activity. As outlined in their submission, the supported housing that Ara Poutama and other service providers manage share the same characteristics as a normal domestic residence and does not generate environmental effects that are different to a normal domestic	1. Delete the proposed PC10 amendments to include "public safety" in RESZ-07, RESZ-O14 and RESZ-O17 2. Any additional or alternative relief which addresses Ara	HUD supports this submission point opposing the inclusion of "public safety" within residential objectives. HUD considers that introducing "public safety" into these objectives shifts the focus of the District Plan away from effects-based resource management and into matters relating to the perceived characteristics or legal status of occupants. These are not matters that can be reliably assessed through land-use planning provisions and are more appropriately addressed through other regulatory and social service systems.

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		Residential Activities			residence. For that reason, Ara Poutama considers that “community housing” should fall within the category of residential activities under the District Plan. Additionally, the submitter does not support the addition of “public safety” to the objectives relating to non-residential activities in Residential zones.	Poutama’s concerns outlined in this submission.	HUD is concerned that the inclusion of “public safety” creates legal risk, including the risk that the provisions are ultra vires under the Resource Management Act. It also introduces a high degree of subjectivity and inconsistency into decision-making, as there is no clear or objective mechanism for assessing public safety outcomes through a resource consent process. Further, HUD considers that these provisions raise human rights and discrimination concerns, particularly where housing activities may be treated differently based on who lives there, rather than how the activity functions or the environmental effects it generates. HUD supports the submission points seeking deletion of “public safety” references in residential objectives to retain an effects-based, lawful, and certain planning framework.
Stratum Consultants Ltd	S_12_04	02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	CCZ-17A	Amend or support in part	Supports the inclusion of Rule CCZ-R17A “Other residential activities not expressly stated in this stable. The submitter requests that the rule should remove the phrase “where, the activity is not located on the ground floor.” The also note that this rule should be relevant to all these types of residential activities and be made discretionary whether they are on the ground floor or above. This also links in with their request to retain Rule CCZ-R1 discussed in submission point S_12_02.	Support Rule CCA-R17A but with amendment	HUD opposes this submission point. HUD considers that Rule CCZ-17A, which captures “other residential activities not expressly stated”, lacks sufficient precision and creates significant uncertainty as to which activities require resource consent, and which effects are to be managed. HUD is concerned that removing locational qualifiers, such as whether an activity is located on the ground floor, does not resolve the underlying issue that the rule is overly broad and may capture activities of a residential nature that do not give rise to adverse environmental effects. This approach increases regulatory discretion and the likelihood of public notification without demonstrating that such controls are necessary. HUD considers that this provision is contrary to the stated objectives of PC10, as it reduces certainty, increases regulatory friction, and undermines the ability to deliver responsive housing solutions in the City Centre.
Kāinga Ora – Homes and Communities	S_23_06	02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	RESZ-R8A	Oppose	Opposes the addition of this rule as there is a concern that this could include a range of activities that are residential in nature and should therefore be permitted within the residential zones. Kāinga Ora seek that those activities that Council wish to restrict be specifically included as activities with accompanying definitions.	Delete RESZ-R8A.	HUD supports this submission point. HUD agrees that the introduction of Rule RESZ-R8A creates a risk that residential activities which are otherwise anticipated within residential zones are captured as discretionary activities, despite not generating adverse environmental effects. HUD considers that defaulting unspecified residential activities to discretionary status undermines housing supply and responsiveness, particularly for non-standard or supported housing models. This approach increases consenting costs and delays and is inconsistent with an effects-based planning framework. HUD supports deletion of RESZ-R8A to maintain certainty and ensure that residential zones continue to function as enabling environments for housing for all people, as required by the NPS-UD.
Ara Poutama Aotearoa-Department of Corrections	S_24_03	02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	RESZ-R8A	Oppose	Residential activities in Residential zones should be permitted activities. Ara Poutama is concerned that the proposed inclusion of a generic category of “Other Residential Activities not expressly provided for” could result in residential activities that are not specifically captured by a Plan definition being classified as a Discretionary activity. That outcome would not support the increased supply of housing to meet the diverse needs of communities, and a Discretionary activity status is not justified by reference to any environmental effects resulting from the Other Residential Activities.	1. Delete RESZ-R8A. 2. Alternatively, classify “Other Residential Activities not expressly provided for” as a permitted activity. 3. Any additional or alternative relief which addresses Ara Poutama’s concerns outlined in this submission.	HUD supports this submission point. HUD agrees that residential activities within residential zones should generally be permitted unless there is clear evidence of adverse environmental effects requiring regulation. HUD considers that the proposed category of “other residential activities not expressly provided for” is overly broad and risks capturing legitimate residential activities that are consistent with the character and amenity of residential zones. Defaulting such activities to discretionary status is not justified on an effects-based basis and may unnecessarily constrain housing delivery. HUD supports deletion of RESZ-R8A to avoid unintended regulatory consequences and to preserve clarity and certainty within residential zones.
Ara Poutama Aotearoa-Department of Corrections	S_24_08	02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	COMZ-R33A	Oppose	Residential activities are permitted in the Commercial zones. Ara Poutama is concerned that the proposed inclusion of a generic category of “Other Residential Activities not expressly provided for” could result in residential activities that are not specifically captured by a Plan definition being classified as a Discretionary activity. That outcome would not support the increased supply of housing to meet the diverse needs of communities, and a Discretionary activity status is not justified by	1. Delete COMZ-R33A. 2. Alternatively, classify “Other Residential Activities not expressly provided for” as a permitted activity. 3. Any additional or alternative relief which addresses Ara Poutama’s concerns outlined in this submission.	HUD supports this submission point. HUD considers that residential activities are an anticipated and appropriate component of commercial zones and do not inherently generate adverse environmental effects that warrant default discretionary activity status. HUD is concerned that COMZ-R33A introduces a generic catch-all provision that may inadvertently capture residential activities that would otherwise be appropriate within the commercial zone context. This increases regulatory uncertainty and may inhibit the provision of supported or community housing in locations well served by services and infrastructure. HUD supports deletion of COMZ-R33A to maintain an enabling, effects-based planning framework.

SUBMITTER NAME	SUB POINT #	TOPIC	PLAN REFERENCE	SUBMITTER POSITION	SUBMISSION POINT SUMMARY	SUBMITTER'S RELIEF SOUGHT	HUD FURTHER SUBMISSION
					reference to any environmental effects resulting from the Other Residential Activities.		
Ara Poutama Aotearoa-Department of Corrections	S_24_09	02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	COMZ-R17A	Oppose	Residential activities are permitted in the City Centre zones. Ara Poutama is concerned that the proposed inclusion of a generic category of "Other Residential Activities not expressly provided for" could result in residential activities that are not specifically captured by a Plan definition being classified as a Discretionary activity. That outcome would not support the increased supply of housing to meet the diverse needs of communities, and a Discretionary activity status is not justified by reference to any environmental effects resulting from the Other Residential Activities.	1. Delete CCZ-R17A. 2. Alternatively, classify "Other Residential Activities not expressly provided for" as a permitted activity. 3. Any additional or alternative relief which addresses Ara Poutama's concerns outlined in this submission.	HUD supports this submission point. HUD considers that residential activities within the City Centre should not be subject to a generic discretionary catch-all rule unless there is clear evidence that such activities generate adverse effects requiring that level of control. HUD is concerned that CCZ-R17A reduces certainty, increases consenting and notification risk, and may capture residential activities that are otherwise compatible with the City Centre environment. This approach relies on discretion rather than targeted regulation and risks undermining housing supply and responsiveness. HUD supports deletion of CCZ-R17A or, alternatively, a more targeted and effects-based approach.
Ara Poutama Aotearoa-Department of Corrections	S_24_12	02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	CCZ-R38B	Oppose	Residential activities are permitted in the City Centre zones. Ara Poutama is concerned that the proposed inclusion of a generic category of "Other Residential Activities not expressly provided for" could result in residential activities that are not specifically captured by a Plan definition being classified as a Discretionary activity. That outcome would not support the increased supply of housing to meet the diverse needs of communities, and a Discretionary activity status is not justified by reference to any environmental effects resulting from the Other Residential Activities.	1. Delete CCZ-R38B. 2. Alternatively, classify "Other Residential Activities not expressly provided for" as a permitted activity. 3. Any additional or alternative relief which addresses Ara Poutama's concerns outlined in this submission.	HUD supports this submission point for the same reasons applying to CCZ-R17A. HUD considers that CCZ-R38B introduces unnecessary regulatory discretion by capturing "other residential activities" without identifying specific environmental effects that require management. HUD is concerned that this provision may inadvertently constrain residential and supported housing activities in the City Centre, increase consenting costs and delays, and expose such activities to public notification unrelated to land-use effects. HUD supports deletion of CCZ-R38B to improve certainty and maintain an enabling planning framework.
Kāinga Ora – Homes and Communities	S_23_02	03. Community Housing definition and provisions	Interpretation	Oppose in part/amend	Planning definitions must remain effects-based rather than people-based. Therefore, Kāinga Ora oppose, in part, the new definition for Community Housing. Kāinga Ora opposes the proposed exclusions, as this distinction is not based on actual environmental effects. It is important to note that under the Resource Management Act ("RMA"), planning rules must relate to environmental effects, not the personal or legal status of occupants who may reside within community housing. Housing that accommodates people on home detention, probation, or other custodial orders do not inherently produce different environmental effects from other supported residential activities. The submitter notes that the proposal instead raises human rights concerns by creating a discriminatory planning distinction that targets individuals based on justice-system status rather than actual land-use outcomes. People subject to community-based sentences have the right to live in and be supported within the community, and planning definitions should remain effects-based rather than based on the legal status of a person.	Amend the definition of 'community housing' as follows: a single place of residence located on a site where specialised care or support is provided to meet the social or physical needs of residents. This definition excludes facilities where residents are subject to legal orders that restrict their freedom of movement, such as custodial care, home detention, or probation-related accommodation.	HUD supports this submission point opposing people-based exclusions within the definition of "community housing," including exclusions based on legal or justice-system status. HUD considers that planning definitions must remain effects-based and should not differentiate between housing activities based on the personal or legal circumstances of residents. Housing that accommodates people subject to community-based orders does not inherently generate different environmental effects from other forms of supported or community housing. HUD is concerned that these exclusions introduce discriminatory planning distinctions that are not supported by the Resource Management Act and expose the District Plan to legal and human rights risk. HUD also notes the absence of locality-specific evidence demonstrating that supported or community housing generates adverse environmental effects that would justify more restrictive treatment. Further, HUD considers that such provisions disproportionately affect vulnerable communities, including whānau Māori, and risk worsening housing insecurity by constraining the delivery of supported and community housing where it is most needed.
Ara Poutama Aotearoa-	S_24_01	03. Community Housing	Interpretation	Oppose in part/amend	Notes that the new definition of "community housing" proposed through PC10: 1. Will	mend the proposed PC10 definition of "community housing" as follows:	HUD supports this submission point opposing people-based exclusions within the definition of "community housing," including exclusions based on legal or justice-system status.

SUBMITTER NAME	SUB POINT #	TOPIC	PLAN REFERENCE	SUBMITTER POSITION	SUBMISSION POINT SUMMARY	SUBMITTER'S RELIEF SOUGHT	HUD FURTHER SUBMISSION
Department of Corrections		definition and provisions			significantly compromise the ability of Ara Poutama and other agencies to provide the necessary accommodation and support for people serving sentences or orders imposed by the courts and the New Zealand Parole Board within the community. 2. Are not based on environmental effects that can or should be addressed under the RMA. 3. Fail to account for the diverse range of housing needs within New Zealand communities. 4. Result in a planning outcome which discriminates between activities based on the circumstances of the residents rather than for sound resource management reasons	community housing: a single place of residence located on a site where specialised care or support is provided to meet the social or physical needs of residents. This definition excludes facilities where residents are subject to legal orders that restrict their freedom of movement, such as custodial care, home detention, or probation-related accommodation. Any additional or alternative relief which addresses Ara Poutama's concerns with the proposed PC10 definition of "community housing".	HUD considers that planning definitions must remain effects-based and should not differentiate between housing activities based on the personal or legal circumstances of residents. Housing that accommodates people subject to community-based orders does not inherently generate different environmental effects from other forms of supported or community housing. HUD is concerned that these exclusions introduce discriminatory planning distinctions that are not supported by the Resource Management Act and expose the District Plan to legal and human rights risk. HUD also notes the absence of locality-specific evidence demonstrating that supported or community housing generates adverse environmental effects that would justify more restrictive treatment. Further, HUD considers that such provisions disproportionately affect vulnerable communities, including whānau Māori, and risk worsening housing insecurity by constraining the delivery of supported and community housing where it is most needed.
Kāinga Ora – Homes and Communities	S_23_07	03. Community Housing definition and provisions	RESZ-R9	Support	Supports the inclusion of a threshold of 8 people residing on the site for a permitted community housing activity within the rule.	Retain as notified	HUD supports this submission point. HUD considers that permitting community housing for up to eight people within residential zones provides an appropriate baseline that recognises community housing as residential in nature. HUD supports this approach as it maintains certainty and avoids unnecessary consenting barriers for smaller-scale community housing that does not generate adverse environmental effects beyond those of ordinary residential activities.
Kāinga Ora – Homes and Communities	S_23_08	03. Community Housing definition and provisions	RESZ-R9	Oppose	Considers that a Restricted Discretionary Activity status with appropriate assessment criteria within RESZ-AC1 is more appropriate for assessing community housing for more than 8 people residing on the site.	Amend to have the activity status as Restricted Discretionary	HUD supports this submission point. HUD agrees that a restricted discretionary activity status is more appropriate than a discretionary or non-complying status for community housing exceeding eight people. HUD considers that a restricted discretionary framework enables effects-based assessment while avoiding disproportionate consenting burden and uncertainty that could inhibit the delivery of supported housing.
Kāinga Ora – Homes and Communities	S_23_09	03. Community Housing definition and provisions	COMZ-R24	Oppose	Oppose limiting the number of persons that reside within community housing within the Commercial Zones as the zone is suitable to accommodate a larger number of persons within such accommodation given the character of the zone. Further, the activity would have similar effects to other activities permitted within the zone.	Amend the rule as follows: Community housing Activity Status: Permitted Where: A maximum of 8 persons (including resident staff) reside on site.	HUD supports this submission point. HUD considers that commercial zones are well suited to accommodate community housing, given access to services, infrastructure, and transport. HUD opposes limiting occupancy numbers or defaulting community housing to more restrictive activity statuses in commercial zones where there is no evidence of adverse environmental effects. HUD supports deletion or amendment of COMZ-R24 to retain a more enabling, effects-based approach.
Kāinga Ora – Homes and Communities	S_23_12	03. Community Housing definition and provisions	COMZ-R24	Oppose	Consequential to submission point S_23_09, Kāinga Ora seek this rule is deleted.	Delete the proposed rule	HUD supports this submission point. HUD considers that commercial zones are well suited to accommodate community housing, given access to services, infrastructure, and transport. HUD opposes limiting occupancy numbers or defaulting community housing to more restrictive activity statuses in commercial zones where there is no evidence of adverse environmental effects. HUD supports deletion or amendment of COMZ-R24 to retain a more enabling, effects-based approach.
Kāinga Ora – Homes and Communities	S_23_13	03. Community Housing definition and provisions	CCZ-R17	Oppose	Oppose limiting the number of persons that reside within community housing within the City Centre Zone as the zone is suitable to accommodate a larger number of persons within such accommodation given the character of the zone and location to amenities. Further, the activity would have similar effects to other activities permitted within the zone.	Amend the rule as follows: Community housing Activity Status: Permitted Where: A maximum of 8 persons (including resident staff) reside on site.	HUD supports this submission point. HUD agrees that limiting the number of persons who may reside within community housing in the City Centre Zone, and defaulting community housing to a more restrictive activity status, is not supported by evidence of adverse environmental effects. HUD considers that the City Centre Zone is specifically intended to accommodate higher-intensity activities and residential uses, given its access to services, transport, and infrastructure. Community housing in this location is residential in nature and does not, by virtue of resident numbers alone, generate effects that are materially different from other residential, or accommodation activities anticipated within the zone. HUD notes that the Section 32 analysis does not demonstrate that community housing in the City Centre produces adverse effects that justify more restrictive regulation than other permitted or anticipated activities. HUD is concerned that imposing occupancy limits or heightened activity statuses increases

SUBMITTER NAME	SUB POINT #	TOPIC	PLAN REFERENCE	SUBMITTER POSITION	SUBMISSION POINT SUMMARY	SUBMITTER'S RELIEF SOUGHT	HUD FURTHER SUBMISSION
							consenting cost, delay, and uncertainty, which can inhibit the timely provision of supported housing without achieving improved environmental outcomes. HUD therefore supports amending CCZ-R17 to retain a more enabling, effects-based approach to community housing within the City Centre Zone.
Kāinga Ora – Homes and Communities	S_23_12	03. Community Housing definition and provisions	CCZ-R17	Oppose	Consequential to submission point S_23_11, Kāinga Ora seek this rule is deleted.	Delete the proposed rule	HUD supports this submission point. HUD agrees that limiting the number of persons who may reside within community housing in the City Centre Zone, and defaulting community housing to a more restrictive activity status, is not supported by evidence of adverse environmental effects. HUD considers that the City Centre Zone is specifically intended to accommodate higher-intensity activities and residential uses, given its access to services, transport, and infrastructure. Community housing in this location is residential in nature and does not, by virtue of resident numbers alone, generate effects that are materially different from other residential, or accommodation activities anticipated within the zone. HUD notes that the Section 32 analysis does not demonstrate that community housing in the City Centre produces adverse effects that justify more restrictive regulation than other permitted or anticipated activities. HUD is concerned that imposing occupancy limits or heightened activity statuses increases consenting cost, delay, and uncertainty, which can inhibit the timely provision of supported housing without achieving improved environmental outcomes. HUD therefore supports amending CCZ-R17 to retain a more enabling, effects-based approach to community housing within the City Centre Zone.
Kāinga Ora – Homes and Communities	S_23_13	03. Community Housing definition and provisions	RURZ-R17	Support	Supports the inclusion of a threshold of 8 people residing on the site for a permitted community housing activity within the rule	Retain as notified	HUD supports this submission point. HUD agrees that providing for community housing accommodating up to eight people as a permitted activity within the Rural Zone appropriately recognises community housing as residential in nature and provides clarity and certainty for smaller-scale supported housing. HUD considers that a permitted activity threshold at this scale is consistent with an effects-based planning framework, as community housing of this size does not, of itself, generate adverse environmental effects that would justify resource consent. HUD supports retaining RURZ-R17 as notified, as it avoids unnecessary regulatory barriers while still allowing larger-scale proposals to be assessed where scale or intensity increases.
Kāinga Ora – Homes and Communities	S_23_14	03. Community Housing definition and provisions	RURZ-R17	Oppose	Considers a Restricted Discretionary Activity status with appropriate assessment criteria in RESZ-AC1 is more appropriate for assessing community housing for more than 8 people residing on the site.	Amend to have the activity status as Restricted Discretionary	HUD supports this submission point. HUD agrees that applying a Discretionary activity status to community housing accommodating more than eight people in the Rural Zone is not supported by evidence of adverse environmental effects and imposes a disproportionate regulatory burden. HUD considers that community housing is residential in nature and that an increase in resident numbers does not, of itself, justify full discretionary status. HUD notes that the Section 32 analysis does not demonstrate that community housing at this scale generates effects materially different from other residential activities anticipated within the Rural Zone. HUD supports a Restricted Discretionary activity status with appropriate assessment criteria as a more proportionate and effects-based approach. This enables consideration of relevant effects where scale increases, while avoiding unnecessary consenting cost, delay, and uncertainty that would arise from a full discretionary pathway and could inhibit the delivery of supported housing.
Ara Poutama Aotearoa- Department of Corrections	S_24_13	03. Community Housing definition and provisions	RURZ-R17(1)	Neutral	Neutral in respect of the proposed inclusion of a permitted activity standard for community housing which limits the number of people that may reside on site to 8 persons (including resident staff).	1. Retain proposed changes to RURZ-R17(1) as notified. 2. Any additional or alternative relief which addresses Ara Poutama's concerns with the proposed PC10 definition of "community housing"	HUD supports this submission point. HUD agrees that retaining a permitted activity standard for community housing accommodating up to eight people in the Rural Zone provides an appropriate, effects-based baseline and recognises community housing as residential in nature. HUD considers that community housing at this scale does not, of itself, give rise to adverse environmental effects that would justify a resource consent requirement. Retaining RURZ-R17(1) as notified provides clarity and certainty, avoids unnecessary regulatory barriers for smaller-scale supported housing, and remains consistent with the stated intent of Plan Change 10 to improve the usability of the District Plan. HUD notes the submitter's broader concerns regarding the proposed definition of "community housing" and addresses those matters separately. In relation to the permitted activity standard in RURZ-R17(1), HUD supports retaining the provision as notified.

SUBMITTER NAME	SUB POINT #	TOPIC	PLAN REFERENCE	SUBMITTER POSITION	SUBMISSION POINT SUMMARY	SUBMITTER'S RELIEF SOUGHT	HUD FURTHER SUBMISSION
Ara Poutama Aotearoa-Department of Corrections	S_24_04	03. Community Housing definition and provisions	RESZ-R9(1)	Neutral	Neutral in respect of the proposed inclusion of a permitted activity standard for community housing which limits the number of people that may reside on site to 8 persons (including resident staff).	1. Retain proposed changes to RESZ-R9(1) as notified. 2. Any additional or alternative relief which addresses Ara Poutama's concerns with the proposed PC10 definition of "community housing".	HUD supports this submission point and retaining permitted activity standards for community housing up to eight people across zones, as these provisions appropriately recognise community housing as residential in nature and avoid unnecessary regulatory burden.
Ara Poutama Aotearoa-Department of Corrections	S_24_05	03. Community Housing definition and provisions	RESZ-R9(3)	Oppose	Does not support the proposed Discretionary activity status for community housing with more than 8 people on the site. Ara Poutama considers that a Restricted Discretionary status with appropriate assessment criteria is more efficient and will ensure that any effects resulting from the exceedance in persons on site can be assessed.	1. Amend the activity status to Restricted Discretionary for RESZ R9(3). 2. Any additional or alternative relief which addresses Ara Poutama's concerns with the proposed PC10 definition of "community housing".	HUD supports these submission points. HUD considers that default discretionary activity status for community housing exceeding eight people imposes disproportionate regulatory burden and increases notification risk without evidence of greater environmental effects. HUD supports a restricted discretionary activity status as a more proportionate and effects-based mechanism.
Ara Poutama Aotearoa-Department of Corrections	S_24_06	03. Community Housing definition and provisions	COMZ-R24(1)	Neutral	Neutral in respect of the proposed inclusion of a permitted activity standard for community housing which limits the number of people that may reside on site to 8 persons (including resident staff).	1. Retain proposed changes to COMZ-R24(1) as notified. 2. Any additional or alternative relief which addresses Ara Poutama's concerns with the proposed PC10 definition of "community housing".	HUD supports this submission point and retaining permitted activity standards for community housing up to eight people across zones, as these provisions appropriately recognise community housing as residential in nature and avoid unnecessary regulatory burden.
Ara Poutama Aotearoa-Department of Corrections	S_24_07	03. Community Housing definition and provisions	COMZ-R24(3B)	Oppose	Does not support the proposed Discretionary activity status for community housing with more than 8 people on the site. Ara Poutama considers that a Restricted Discretionary status with appropriate assessment criteria is more efficient and will ensure that any effects resulting from the exceedance in persons on site can be assessed	1. Amend the activity status to Restricted Discretionary for COMZ-R24(3B). 2. Any additional or alternative relief which addresses Ara Poutama's concerns with the proposed PC10 definition of "community housing"	HUD supports this submission point. HUD agrees that applying a Discretionary activity status to community housing accommodating more than eight people in the Commercial Zone is not supported by evidence of adverse environmental effects and imposes a disproportionate regulatory burden. HUD considers that commercial zones are generally well suited to accommodate higher-intensity residential and accommodation activities, given their access to services, transport, and infrastructure. An increase in the number of residents within community housing does not, of itself, justify full discretionary status in this zone, particularly where the Section 32 analysis does not demonstrate effects materially different from other permitted or anticipated activities. HUD is concerned that a Discretionary activity pathway increases consenting cost, delay, and the likelihood of public notification, which has been shown through recent Rotorua experience to create regulatory friction and opposition unrelated to land-use effects. HUD supports a Restricted Discretionary activity status as a more proportionate and effects-based approach that enables relevant matters to be assessed without unnecessarily constraining the delivery of supported housing.
Ara Poutama Aotearoa-Department of Corrections	S_24_10	03. Community Housing definition and provisions	CCZ-R17(1)	Neutral	Neutral in respect of the proposed inclusion of a permitted activity standard for community housing which limits the number of people that may reside on site to 8 persons (including resident staff).	1. Retain proposed changes to CCZ-R17(1) as notified. 2. Any additional or alternative relief which addresses Ara Poutama's concerns with the proposed PC10 definition of "community housing".	HUD supports this submission point and retaining permitted activity standards for community housing up to eight people across zones, as these provisions appropriately recognise community housing as residential in nature and avoid unnecessary regulatory burden.
Ara Poutama Aotearoa-Department of Corrections	S_24_11	03. Community Housing definition and provisions	CCZ-R17(3)	Oppose	Does not support the proposed Discretionary activity status for community housing with more than 8 people on the site. Ara Poutama considers that a Restricted Discretionary status with appropriate assessment criteria is more efficient and will ensure that any effects resulting from the exceedance in persons on site can be assessed.	1. Amend to have the activity status as Restricted Discretionary for CCZ-R17(3). 2. Any additional or alternative relief which addresses Ara Poutama's concerns with the proposed PC10 definition of "community housing".	HUD supports this submission point. HUD agrees that applying a Discretionary activity status to community housing accommodating more than eight people in the City Centre Zone is not supported by evidence of adverse environmental effects and imposes a disproportionate regulatory burden. HUD considers that community housing is residential in nature and that an increase in the number of residents does not, of itself, justify full discretionary status in a zone that is specifically intended to accommodate a wide range of activities at higher intensity. HUD notes that the Section 32 analysis does not demonstrate that community housing at this scale results in effects materially different from other residential or accommodation activities permitted or anticipated within the City Centre. HUD is concerned that a Discretionary activity status significantly increases consenting cost, delay, and the likelihood of public notification, which has been shown through recent Rotorua experience to amplify opposition unrelated to land-use effects. HUD supports a Restricted Discretionary activity status as a more

SUBMITTER NAME	SUB POINT #	TOPIC	PLAN REFERENCE	SUBMITTER POSITION	SUBMISSION POINT SUMMARY	SUBMITTER'S RELIEF SOUGHT	HUD FURTHER SUBMISSION
							proportionate, effects-based approach that enables relevant matters to be assessed without creating unnecessary regulatory friction or undermining the delivery of supported housing.
Ara Poutama Aotearoa-Department of Corrections	S_24_14	03. Community Housing definition and provisions	RURZ-R17(3)	Oppose	Does not support the proposed Discretionary activity status for community housing with more than 8 people on the site. Ara Poutama considers that a Restricted Discretionary status with appropriate assessment criteria is more efficient and will ensure that any effects resulting from the exceedance in persons on site can be assessed	1. Amend to have the activity status as Restricted Discretionary for RURZ-R17(3). 2. Any additional or alternative relief which addresses Ara Poutama's concerns with the proposed PC10 definition of "community housing"	HUD supports this submission point. HUD agrees that classifying community housing accommodating more than eight people in the Rural Zone as a Discretionary activity imposes a disproportionate regulatory burden that is not justified by evidence of adverse environmental effects. HUD considers that community housing is residential in nature and that an exceedance of an occupancy threshold does not, of itself, result in effects that warrant full discretionary status. HUD is concerned that a Discretionary activity pathway increases consenting cost, delay, and the likelihood of public notification, which can materially constrain the timely provision of supported housing. HUD supports a Restricted Discretionary activity status as a more proportionate and effects-based approach, enabling consideration of relevant effects where scale increases, while avoiding unnecessary regulatory friction and uncertainty that is inconsistent with the stated intent of Plan Change 10 to improve clarity and usability of the District Plan.
Hao Boutique Hotel Group	S_25_03	03. Community Housing definition and provisions	Interpretation	Support	Supports the changes in principle, which provide a definition update and targeted updates to specific rules in each zone to address the identified issues considered in the s32 Report in an efficient and effective manner.	Retain as notified	HUD opposes this submission point. While the submitter expresses general support for the changes proposed through Plan Change 10, HUD does not support an unqualified endorsement of the plan change in its current form. HUD considers that Plan Change 10, as notified, has unintended consequences for the provision of community, supported, and emergency housing. In particular, HUD is concerned that the plan introduces higher regulatory thresholds, increased discretion, and greater uncertainty for supported housing activities, without demonstrating that these activities generate adverse environmental effects that justify such treatment. HUD's recent experience in Rotorua demonstrates that discretionary and non-complying activity pathways for emergency and supported housing result in significant regulatory friction, delay, cost, and public opposition unrelated to land-use effects. HUD is concerned that supporting Plan Change 10 without amendment would entrench these barriers and inhibit the Government's ability to respond effectively to housing need. HUD therefore opposes this submission point and supports amendments to Plan Change 10 to ensure the framework remains effects-based, proportionate, and consistent with national direction to enable housing supply and access.
Stratum Consultants Ltd	S_12_03	04. Default Activity Status in the City Centre 1 and 2 Zones	CCZ-R1	Oppose	Opposes the proposal to make the default activity status within the City Centre Zone Discretionary rather than permitted. The submitter notes that the City Centre should be an enabling environment that encourages investment, growth, and redevelopment. Introducing additional consenting requirements will increase costs, extend timeframes, and create further uncertainty for developers and landowners. Given the current economic climate and the presence of vacant commercial premises, additional regulatory barriers are counterproductive. In their view, the proposed change seeks to address a problem that has not been clearly demonstrated and risks undermining the vitality of the City Centre. The submitter requests that if Council have issues with activities being established in the city centre zones without the need of a resource consent, then deeper analysis should be undertaken to identify what these specific activities actually are. Once understood, these activities can then be listed as requiring resource consent with an appropriate activity status assigned to	Retain the existing permitted activity status (CCZ-R1) for unspecified activities within the City Centre Zone.	HUD supports this submission point opposing the use of a blanket discretionary default activity status in the City Centre as this approach is not supported by targeted, effects-based analysis. HUD considers the proposed changes are not supported by the s32 analysis and risk unintended consequences. HUD considers that broad discretionary mechanisms and catch-all rules, rather than clearly identifying and regulating specific activities of concern, creates unnecessary regulatory burden and uncertainty. This approach increases consenting costs and the likelihood of public notification without demonstrating that such outcomes are required to manage environmental effects. Drawing on HUD's experience with emergency housing resource consents in Rotorua, discretionary and non-complying pathways have resulted in significant regulatory friction, delay, and opposition unrelated to land-use effects. HUD is concerned that similar outcomes would arise under the proposed City Centre provisions, inhibiting the timely delivery of housing and other activities that support community wellbeing. HUD therefore supports submission points seeking a more targeted and proportionate approach that retains an enabling planning framework while addressing demonstrated effects.

SUBMITTER NAME	SUB POINT #	TOPIC	PLAN REFERENCE	SUBMITTER POSITION	SUBMISSION POINT SUMMARY	SUBMITTER'S RELIEF SOUGHT	HUD FURTHER SUBMISSION
					them, rather than taking a generic sledgehammer approach.		
New Zealand Defence Force	S_19_01	04. Default Activity Status in the City Centre 1 and 2 Zones	CCZ-R1	Oppose	Notes that the S32 Report states that the City Centre Zone requires “more targeted and deliberate management of activity types” to protect long-term quality, safety, and functionality. However, the proposed plan change does not follow through on this intention. Aside from a new “catch-all” rule (CCZ-R17A) and changes to the activity status of CCZ-R1, there is little targeted management of specific activity types. As a result, the broader implications of the “catch-all” approach are not assessed, including its effects on activities that do not generate the adverse outcomes the plan seeks to manage. One such activity is NZDF’s temporary military training activities (TMTA), which would be inappropriately captured by the new rule. NZDF conducts TMTA nationwide to fulfil its statutory purpose under section 5 of the Defence Act 1990, maintain operational capacity, and support community well-being and safety. Importantly, many NZDF training activities conducted “off base” are comparable to those undertaken by other public service agencies such as Police, Fire and Emergency New Zealand, or Land Search and Rescue. Training in off-base environments is essential to achieving realistic, context-appropriate skill development that cannot be fully replicated on-base. The proposed plan change fails to recognise these distinctions and applies an unduly broad restriction that could hinder NZDF’s ability to carry out necessary training activities.	Amend the plan change so that Rule CCZ-R1.1 remains a permitted activity and specific rules are introduced to address the issues that are of concern due to their adverse effects on the city centre. In the alternative, amend specific rules that may be inadvertently affected by this change including amendment of Rule TEMP-R2 to delete the exclusion of City Centre Zones so that temporary military training activities remain permitted in the City Centre 1 and 2 Zones. So that the changes directly relate to the outcomes sought, NZDF requests that the catch all Rule CCZ-R1.1 remain a permitted activity and specific rules are introduced to address those activities of concern as has been proposed through the introduction of Rules CCZ-R17A and CCZ R17.3 relating to residential activities. This is vital to enable NZDF appropriate provision to undertake temporary military training activities (TMTA) which NZDF needs to be able to undertake to meet its statutory purposes and government expectations.	HUD supports this submission point opposing the use of a blanket discretionary default activity status in the City Centre where this approach is not supported by targeted, effects-based analysis. HUD considers the proposed changes are not supported by the s32 analysis and risk unintended consequences. HUD considers that broad discretionary mechanisms and catch-all rules, rather than clearly identifying and regulating specific activities of concern, creates unnecessary regulatory burden and uncertainty. This approach increases consenting costs and the likelihood of public notification without demonstrating that such outcomes are required to manage environmental effects. Drawing on HUD’s experience with emergency housing resource consents in Rotorua, discretionary and non-complying pathways have resulted in significant regulatory friction, delay, and opposition unrelated to land-use effects. HUD is concerned that similar outcomes would arise under the proposed City Centre provisions, inhibiting the timely delivery of housing and other activities that support community wellbeing. HUD therefore supports submission points seeking a more targeted and proportionate approach that retains an enabling planning framework while addressing demonstrated effects.
Hao Boutique Hotel Group	S_25_04	04. Default Activity Status in the City Centre 1 and 2 Zones	CCZ-R1	Oppose	Opposes the proposed change to Rule CCZ-R1. The submitter notes the proposed change is viewed as inefficient, ineffective, and misaligned with the Operative Rotorua District Plan (ODP). Instead of targeting specific problematic activities in the city centre, it removes the broad permitted activity rule entirely—an approach that would unnecessarily restrict many positive, everyday commercial activities such as cinemas, entertainment venues, recreation facilities, galleries, markets, and similar uses that contribute to a vibrant city centre. The s32 evaluation has not adequately assessed the economic, social, or development impacts of such a shift, nor has it considered how this would undermine the ODP’s objectives, which explicitly promote a diverse, intensive mix of activities through an enabling regulatory environment. The proposal also fails to evaluate whether the remaining listed permitted activities would still support the diverse commercial mix the CCZ is intended to accommodate. Finally, the submitter	Delete the proposed change to Rule CCZ-R1. Retain Rule CCZ R1 as per Operative District Plan.	HUD supports this submission point opposing the use of a blanket discretionary default activity status in the City Centre where this approach is not supported by targeted, effects-based analysis. HUD considers the proposed changes are not supported by the s32 analysis and risk unintended consequences. HUD considers that broad discretionary mechanisms and catch-all rules, rather than clearly identifying and regulating specific activities of concern, creates unnecessary regulatory burden and uncertainty. This approach increases consenting costs and the likelihood of public notification without demonstrating that such outcomes are required to manage environmental effects. Drawing on HUD’s experience with emergency housing resource consents in Rotorua, discretionary and non-complying pathways have resulted in significant regulatory friction, delay, and opposition unrelated to land-use effects. HUD is concerned that similar outcomes would arise under the proposed City Centre provisions, inhibiting the timely delivery of housing and other activities that support community wellbeing. HUD therefore supports submission points seeking a more targeted and proportionate approach that retains an enabling planning framework while addressing demonstrated effects.



SUBMITTER NAME	SUB POINT #	TOPIC	PLAN REFERENCE	SUBMITTER POSITION	SUBMISSION POINT SUMMARY	SUBMITTER'S RELIEF SOUGHT	HUD FURTHER SUBMISSION
					notes that the change runs counter to emerging central government reforms aimed at creating a more enabling, growth-supportive planning system		

Further Submission on the Rotorua Lakes Council Plan Change 10 by Kāinga Ora – Homes and Communities

Clause 8 of Schedule 1 to the Resource Management Act 1991

To: Rotorua Lakes Council
By email via: policy.planning@rotorualc.nz

Name of Further Submitter: Kāinga Ora – Homes and Communities

1. **Kāinga Ora – Homes and Communities** (“**Kāinga Ora**”) makes this further submission on the **Rotorua Lakes Council Plan Change 10** (“**PC10**”) in support of/in opposition to original submissions to the PC10.
2. Kāinga Ora has an interest in PC10 that is greater than the interest the general public has, being an original submitter on the PC10 with respect to its interests as Crown entity responsible for the provision of public housing, and its housing portfolio in Rotorua.
3. Kāinga Ora makes this further submission in respect of submissions by third parties to the PC10.

Reasons for further submission

4. The submissions that Kāinga Ora supports or opposes are set out in the table attached as **Appendix A** to this further submission.
5. The reasons for this further submission are:
 - (a) The reasons set out in the Kāinga Ora primary submission on PC10.
 - (b) In the case of the Primary Submissions that are opposed:
 - (i) The Primary Submissions do not promote the sustainable management of natural and physical resources and are otherwise inconsistent with

the purpose and principles of the Resource Management Act 1991 (“RMA”);

- (ii) The relief sought in the Primary Submissions is not the most appropriate in terms of section 32 of the RMA;
 - (iii) Rejecting the relief sought in the Primary Submissions opposed would more fully serve the statutory purpose than would implementing that relief; and
 - (iv) The Primary Submissions are inconsistent with the policy intent of the Kāinga Ora primary submission.
- (c) In the case of Primary Submissions that are supported:
- (i) The Primary Submissions promote the sustainable management of natural and physical resources and are consistent with the purpose and principles of the RMA and with section 32 of the RMA;
 - (ii) The reasons set out in the Primary Submissions; and
 - (iii) Allowing the relief sought in the Primary Submissions supported would more fully serve the statutory purpose than would disallowing that relief.
6. Without limiting the generality of the above, the specific relief in respect of each Primary Submission that is supported or opposed is set out in **Appendix A**.
7. Kāinga Ora wishes to be heard in support of its further submission.
8. If others make a similar submission, Kāinga Ora will consider presenting a joint case with them at a hearing.

DATED 20 April 2026

Kāinga Ora – Homes and Communities



Brendon Liggett
Manager – Development Planning

ADDRESS FOR SERVICE:

Kāinga Ora – Homes and Communities

PO Box 74598

Greenlane, Auckland

Attention: Development Planning Team

Email: developmentplanning@kaingaora.govt.nz

Appendix A: Further Submission by Kāinga Ora on Rotorua Lakes Council Proposed Plan Change 10

Submitter Name	Sub ID #	Sub Point #	Topic	Plan Reference	Position	Summary of Submission Point	Relief Sought by Submitter	Kāinga Ora Response	Kāinga Ora Reasons	Decision(s) Sought
Ngāti Pikiao Environmental Society	S_10	S_10.03	03. Community Housing definition and provisions	Interpretation and objectives in Residential zones	Amend or support in part	Interpretation and objectives in Residential zones	The submitter requests that PC10 Requires: <ul style="list-style-type: none"> • Management plans for larger facilities • Assessment of proximity to sensitive community facilities • Infrastructure adequacy evaluation 	Oppose	Kāinga Ora opposes the addition of management plans for community housing and proximity assessments. Kāinga Ora is concerned that the introduction of such assessment matters may give rise to assessment of matters beyond the scope of RMA effects. Assessment of proximity to sensitive activities is also unnecessary given that the activity is as a residential activity.	Retain the operative plan assessment criteria.
Stratum Consultants Ltd	S_12	S_12_03	04. Default Activity Status in the City Centre 1 and 2 Zones	CCZ-R1	Oppose	The applicant opposes the proposal to make the default activity status within the City Centre Zone Discretionary rather than Permitted. The submitter notes that the City Centre should be an enabling environment that encourages investment, growth, and redevelopment. Introducing additional consenting requirements will increase costs, extend timeframes, and create further uncertainty for developers and landowners. Given the current economic climate and the presence of vacant commercial premises, additional regulatory barriers are counterproductive. In their view, the proposed change seeks to address a problem that has not been clearly demonstrated and risks undermining the vitality of the City Centre. The submitter requests that if Council have issues with activities being established in the city centre zones without the need of a resource consent, then deeper analysis should be undertaken to identify what these specific activities actually are. Once understood, these activities can then be listed as required resource consent with an appropriate activity status assigned to them, rather than taking a generic sledgehammer approach.	Retain the existing permitted activity status (CCZ-R1) for unspecified activities within the City Centre Zone.	Support	Kāinga Ora supports the submission and agrees that those activities the Council wish to restrict should be outlined and an appropriate activity status provided.	Retain the existing permitted activity status (CCZ-R1) for unspecified activities within the City Centre Zone.

Stratum Consultants Ltd	S_12	S_12_04	02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	CCZ-17A	Amend or support in part	Supports the inclusion of Rule CCZ-R17A “Other residential activities not expressly stated in this stable. The submitter requests that the rule should remove the phrase “where, the activity is not located on the ground floor”. The also note that this rule should be relevant to all of these types of residential activities and be made discretionary whether they are on the ground floor or above. This also links in with their request to retain Rule CCZ-R1 discussed in submission point S_12_02.	Support Rule CCA-R17A but with amendment	Oppose	Kāinga Ora opposes the introduction of rule CCA-R17A consistent with Kāinga Ora submissions S_23_06 which seeks the deletion of a similar rule from the residential zones and Kāinga Ora support for S_12_03 to retain permitted activity status for unlisted activities in the CCZ.	Delete rule CCA-R17A
McKenzie & Co Consultants Limited	S_22	S_22_05	09. Reversing onto Rights of Way	APP1	Support	The applicant supports the proposed change, to allow the reversing/turning of vehicles onto a right of way to be considered as compliant with the Turning Standards.	Retain as notified	Support	Kāinga Ora supports the changes to the turning standards through PC10. This allows the appropriate use of the ROW where sufficient reverse turning circles can be provided for and reduces vehicle manoeuvring on each private site.	Retain as notified.



ARA POUTAMA AOTEAROA THE DEPARTMENT OF CORRECTIONS: FURTHER SUBMISSION ON PLAN CHANGE 10 – ROTORUA DISTRICT PLAN

To: Rotorua Lakes Council
DX Mailbox JX 10503
Rotorua 3046

Email: Policy.Planning@rotorualc.nz

**Further
Submitter:** Ara Poutama Aotearoa the Department of Corrections
Private Box 1206
Wellington 6140

Attention: Sam Gifford – Manager, Resource Management and Land Management
(Acting)

Ara Poutama Aotearoa the Department of Corrections (**Ara Poutama**) makes further submissions on Plan Change 10 to the Rotorua District Plan (**PC10**) in the **attached** document.

Ara Poutama is a submitter on PC10 (submitter number 24), and as a central government agency administering Corrections housing services within Rotorua Lakes District, has an interest greater than the general public.

Ara Poutama would like to be heard in support of its further submission at a hearing. If others make a similar submission, Ara Poutama will consider presenting a joint case with them at the hearing.

Dated this 20th day of April 2026

A handwritten signature in blue ink, appearing to be 'SG', written over a horizontal line.

Sam Gifford
Manager, Resource Management & Land Management (Acting)

Further Submissions

Submitter's Name	Submission Number	Submission Point	Support / Oppose	Reasons
Ngāti Pikiao Environmental Society	S_10	S_10_02	Oppose	<p>The submitter considers Discretionary status for “Other Residential Activities not expressly provided for” improves oversight, but requests additional assessment criteria is added relating to infrastructure capacity, lake catchment effects, cumulative concentration and cultural impact.</p> <p>Ara Poutama considers that Discretionary status for “Other Residential Activities not expressly provided for” in rules RESZ-R8A, COMZ-R33A, CCZ-17A, and CCZ-38B would not support the increased supply of housing to meet the diverse needs of communities, and a Discretionary activity status is not justified by reference to any environmental effects resulting from the Other Residential Activities.</p>
Ngāti Pikiao Environmental Society	S_10	S_10_03	Oppose in part	<p>The submitter supports clarification regarding the community housing definition and provisions but notes that public safety references must avoid stigmatisation and be effects based. The submitter requests management plans for larger facilities, assessment of proximity to sensitive community facilities and infrastructure adequacy evaluation.</p> <p>Ara Poutama considers the exclusions in the community housing definition, requiring management plans for larger facilities, and assessment of proximity to sensitive activities will not achieve the submitters intent of ensuring the provisions avoid stigmatisation and are effects based. Rather they will result in a planning outcome which discriminates between activities based on the circumstances of the residents rather than for sound resource management reasons and is not based on any environmental effects that can and should be addressed under the RMA.</p>
Stratum Consultants Ltd	S_12	S_12_02	Support	<p>The submitter opposes the insertion of “public safety” into the relevant residential objectives RESZ-O7, RESZ-O14, and RESZ-O17 and considers it is not appropriate for land use planning provisions to regulate behaviour in this manner.</p> <p>Ara Poutama supports the submission on the basis that inclusion of “public safety” into the residential objectives will result in a planning outcome which discriminates between activities based on the circumstances of the residents rather than for sound resource management reasons and is not based on environmental effects that can or should be addressed under the RMA.</p>
Stratum Consultants Ltd	S_12	S_12_03	Support	<p>The submitter opposes the proposal to make the default activity status within the City Centre Zone Discretionary rather than Permitted. The submitter notes the City Centre should be an enabling environment and considers the proposed change seeks to address a problem that has not been clearly demonstrated.</p>

Further Submissions

Submitter's Name	Submission Number	Submission Point	Support / Oppose	Reasons
				<p>Ara Poutama supports the submission on the basis the role of the City Centre Zone (as per the objectives) is to achieve a vibrant city centre that is the primary centre for the establishment and operation of a diverse range of activities. Rather than applying a generic catch all approach, those activities that require resource consent should be specifically identified based on a demonstrated need for consent due to their adverse effects.</p>
Stratum Consultants Ltd	S_12	S_12_04	Oppose	<p>The submitter supports the inclusion of rule CCZ-R17A “Other Residential Activities not expressly stated” in the City Centre zone but considers the ground floor limitation should be removed.</p> <p>Ara Poutama considers that Discretionary status for “Other Residential Activities not expressly provided for” would not support the increased supply of housing to meet the diverse needs of communities, and a Discretionary activity status is not justified by reference to any environmental effects resulting from the Other Residential Activities.</p>
Waikite Valley Community Collective	S_21	S_21_01	Oppose	<p>The submitter supports the exclusions within the community housing definition and considers there needs to be improved clarity regarding exclusions for boarding houses and other forms of communal/shared housing within rural zones. The submitter requests community housing is a prohibited activity for over 8 people including staff in the rural zone (among other rural zone-specific changes).</p> <p>Ara Poutama considers the exclusions in the community housing definition, and prohibited activity status for community housing in the rural zone:</p> <ol style="list-style-type: none"> 1. Will significantly compromise the ability of Ara Poutama and other agencies to provide the necessary accommodation and support for people serving sentences or orders imposed by the courts and the New Zealand Parole Board within the community. 2. Are not based on environmental effects that can or should be addressed under the RMA. 3. Will fail to account for the diverse range of housing needs within New Zealand communities. 4. Will result in a planning outcome which discriminates between activities based on the circumstances of the residents rather than for sound resource management reasons.

Further Submissions

Submitter's Name	Submission Number	Submission Point	Support / Oppose	Reasons
Marnel	S_09	S_09_02	Oppose in part	<p>The submitter supports improving clarity, specifically in relation to the community housing provisions. The submitter requests that the community housing provisions enable rather than restrict affordable housing supply.</p> <p>Ara Poutama supports enabling affordable housing supply, however considers the exclusions in the community housing definition will not achieve that outcome, particularly in terms of increasing the availability of housing to meet the diverse range of housing needs within New Zealand communities. That includes the necessary accommodation and support provided by Ara Poutama and other agencies for people serving sentences or orders imposed by the courts and the New Zealand Parole Board within the community.</p>
Hamiora Werahiko	S_18	S_18_01	Oppose in part	<p>The submitter supports the updated community housing definition and provisions as it provides a clearer pathway for non-typical residential arrangements, and requests inclusion of "Papakāinga" in the definition.</p> <p>Ara Poutama supports providing clearer pathways for non-typical residential arrangements, however considers the exclusions in the community housing definition will not achieve that outcome and particularly in terms of increasing housing to meet the diverse range of housing needs within New Zealand communities. That includes the necessary accommodation and support provided by Ara Poutama and other agencies for people serving sentences or orders imposed by the courts and the New Zealand Parole Board within the community.</p>
Kainga Ora	S_23	S_23_02	Support	<p>The submitter considers planning definitions should remain effects based rather than people based and considers the exclusions in the current community housing definition should be removed.</p> <p>Ara Poutama supports the submission on the basis that the exclusions in the community housing definition will result in a planning outcome which discriminates between activities based on the circumstances of the residents rather than for sound resource management reasons and is not based on environmental effects that can or should be addressed under the RMA.</p>
Kainga Ora	S_23	S_23_05	Support	<p>The submitter opposes the insertion of "public safety" into the relevant residential objectives RESZ-O7, RESZ-O14, and RESZ-O17 as this is not a resource management consideration.</p> <p>Ara Poutama supports the submission on the basis that the inclusion of "public safety" into the residential objectives will result in a planning outcome which discriminates between</p>

Further Submissions

Submitter's Name	Submission Number	Submission Point	Support / Oppose	Reasons
				activities based on the circumstances of the residents rather than for sound resource management reasons and is not based on environmental effects that can or should be addressed under the RMA.
Kainga Ora	S_23	S_23_06	Support	<p>The submitter opposes the introduction of “Other Residential Activities not expressly provided for” as a Discretionary activity under rule RESZ-R8A and considers this should be a Permitted activity.</p> <p>Ara Poutama supports the submission on the basis that Discretionary status for “Other Residential Activities not expressly provided for” would not support the increased supply of housing to meet the diverse needs of communities, and a Discretionary activity status is not justified by reference to any environmental effects resulting from the Other Residential Activities.</p>
Kainga Ora	S_23	S_23_08	Support	<p>The submitter considers that Restricted Discretionary status is more appropriate for assessing community housing for more than 8 people residing on the site under rule RESZ-R9.</p> <p>Ara Poutama supports the submission on the basis that a Restricted Discretionary status with appropriate assessment criteria is more efficient and will ensure that any effects resulting from the exceedance in persons on site can be assessed.</p>
Kainga Ora	S_23	S_23_14	Support	<p>The submitter considers that Restricted Discretionary status is more appropriate for assessing community housing for more than 8 people residing on the site under rule RURZ-R17.</p> <p>Ara Poutama supports the submission on the basis that a Restricted Discretionary status with appropriate assessment criteria is more efficient and will ensure that any effects resulting from the exceedance in persons on site can be assessed.</p>
Hao Boutique Hotel Group	S_25	S_25_03	Oppose	<p>The submitter supports the changes to the community housing definition and associated rules in each zone.</p> <p>Ara Poutama considers the exclusions in the community housing definition:</p> <ol style="list-style-type: none"> 1. Will significantly compromise the ability of Ara Poutama and other agencies to provide the necessary accommodation and support for people serving sentences or orders imposed by the courts and the New Zealand Parole Board within the community.

Further Submissions

Submitter's Name	Submission Number	Submission Point	Support / Oppose	Reasons
				<ol style="list-style-type: none"> 2. Are not based on environmental effects that can or should be addressed under the RMA. 3. Will fail to account for the diverse range of housing needs within New Zealand communities. 4. Will result in a planning outcome which discriminates between activities based on the circumstances of the residents rather than for sound resource management reasons.
Margaret Qu	S_26	S_26_01	Oppose	<p>The submitter supports the inclusion of “public safety” in the residential objectives, and the clarification of the definition including community housing. The submitter requests emergency housing be classified as non-complying or prohibited within a defined core commercial area.</p> <p>Ara Poutama considers the exclusions in the community housing definition, inclusion of “public safety” in residential objectives RESZ-O7, RESZ-O14, and RESZ-O17, and making emergency housing non-complying or prohibited:</p> <ol style="list-style-type: none"> 1. Will significantly compromise the ability of Ara Poutama and other agencies to provide the necessary accommodation and support for people serving sentences or orders imposed by the courts and the New Zealand Parole Board within the community. 2. Are not based on environmental effects that can or should be addressed under the RMA. 3. Will fail to account for the diverse range of housing needs within New Zealand communities. 4. Will result in a planning outcome which discriminates between activities based on the circumstances of the residents rather than for sound resource management reasons.
Lauren James	S_27	S_27_01	Support	<p>The submitter opposes the changes to the community housing definition, considering it will result in greater uncertainty and will constrain the delivery of supported and community housing. The submitter requests a more permissive activity status for community housing and considers community housing should be explicitly recognised as essential social infrastructure. The submitter opposes the introduction of rigid occupancy thresholds.</p>

Further Submissions

Submitter's Name	Submission Number	Submission Point	Support / Oppose	Reasons
				Ara Poutama supports the submission on the basis the exclusions in the community housing definition will constrain the availability of housing to meet the diverse range of housing needs within New Zealand communities. That includes the necessary accommodation and support provided by Ara Poutama and other agencies for people serving sentences or orders imposed by the courts and the New Zealand Parole Board within the community.

Table 1: Further Submitter Details

Name of Submitter:	Hao Boutique Hotel Group (HBHG)	
Contact (if relevant):	Darren Clark McKenzie & Co Consultants Limited 1284 Eruera Street, Rotorua 3010	
Address for service (email preferred)	darren@mcl.co.nz	
Phone number:	[REDACTED]	
Hearing attendance:	We do wish to be heard in support of my submission at the public hearing of submissions	
Willingness to present joint case at hearing:	If others make a similar submission, we will consider presenting a joint case with them at a hearing.	
Status to make a further submission:	<i>[Indicate which one of these criteria you meet to make a further submission and why:]</i>	
	Y	I am a person who has an interest in the proposal that is greater than the interest the general public has Hao Boutique Hotel Group own land and properties in the city centre, rural and residential zones, that will be affected by the proposed changes. Hao Boutique Hotel Group also have long term development interests in expanding both tourism-led and commercial development in Rotorua, that will be affected by the proposed changes.
Signature:	<i>D.Clark</i>	
Date of Submission:	20 April 2026	

Table 2: Original submissions supported or opposed

[Add additional rows to respond to submission points, as needed]

LEGEND for colour coding below:

Green = Tourist Accommodation definition changes

Blue = City Centre Zone (CCZ) default activity status rule change

Orange = Boarding/Communal/Shared Housing changes

Red = Community Housing changes

Submission Number	Submitter's Name	Section Reference (Submission Point)	Support/ Oppose	Reasons
<p><i>State the submission ID# for the original submission that you are commenting on (you can find this in the summary of submissions).</i></p>	<p><i>State who made the submission that you are commenting on.</i></p>	<p><i>Clearly indicate which parts of the original submission you are commenting on – preferably use the submission point number in the summary of submissions. Use a separate row for each point you support/oppose.</i></p>	<p><i>State your position on the point made in the original submission, for example, whether you support, oppose or support in part, etc.</i></p>	<p><i>Explain the reasons for your support / opposition.</i></p>
S_11	Mikail Nicolaas Steens	S_11_01	Support in part	<p>HBHG support their submission point to ensure the activities of Visitor Accommodation, Holiday Rental Accommodation, and Bed and Breakfast are clearly distinguished, with definitions and activity rules that are consistent, and outcome-certain, with appropriate guidance for interpretation/application.</p> <p>HBHG consider that PC 10 has already attempted to do this. We seek to ensure that any further distinctions and clarifications are followed through and that we are involved in any further amendments.</p>
S_12	Stratum Consultants Ltd	S_12_01	Support in part	<p>HBHG support their submission point to support the new Visitor Accommodation definition as proposed. However, we seek further clarity is</p>

				added to the new definition in relation to ‘ancillary activities’, as per our original submission.
S_23	Kāinga Ora – Homes and Communities	S_23_04	Support in part	HBHG support their submission point to update the new Visitor Accommodation definition as proposed. However, we seek further clarity is added to the new definition in relation to ‘ancillary activities’, as per our original submission.
S_10	Ngāti Pikiao Environmental Society	S_10_04	Oppose	HBHG oppose their submission point in support of the proposed change to discretionary activity default status in CCZ. The reasons for this are as per our original submission.
S_12	Stratum Consultants Ltd	S_12_03	Support	HBHG support their relief sought to retain the existing default permitted activity status in CCZ. We support their submission points which align with and reiterate our concerns with the proposed changes to this default rule, as per our original submission.
S_19	New Zealand Defence Force	S_19_01	Support	<p>HBHG support their relief sought to retain the existing default permitted activity status in CCZ. We support their submission points which align with and reiterate our concerns with the proposed changes to this default rule, as per our original submission.</p> <p>Their submission represents a clear example of the range of diverse activities/operations that will be unduly affected by such a far-reaching, blanket default rule change in the CCZ.</p> <p>Their alternative relief sought for necessary changes to the Temporary Activity rules for the CCZ to support their operations, reiterates our original submission points that the relationship between the CCZ provisions and all other provisions of the District Plan, including those for Temporary Activities in the CCZ, have not been fully understood and considered in the Section 32 report. HBHG consider that the Temporary Activity rules and all other provisions of the District Plan require full evaluation, should any changes to the default permitted activity status in CCZ be pursued by Council.</p>
S_10	Ngāti Pikiao Environmental Society	S_10_02	Support in part	HBHG support their submission point in principle in support of the discretionary activity status rule changes. HBHG support their request for further assessment criteria to be provided. This will assist with providing a

				clear framework for the assessment of such resource consent applications. HBHG do not specifically support the specific assessment criteria topics listed in their relief support.
S_12	Stratum Consultants Ltd	S_12_02	Support	HBHG support their submission point to remove references to ‘public safety’ in the objectives and policies. We generally agree with their supporting comments. HBHG consider that the Operative objectives and policies already address public safety matters through various policies and assessment criteria that seek outcomes for attractive and safe streets and public open spaces, and passive surveillance, eg. RESZ-P3 and assessment criteria CCZ-MC1 and CCZ-MDA.
S_12	Stratum Consultants Ltd	S_12_04	Support	HBHG support their submission point to retain new Rule CCZ-R17A with amendment as per their submission. We generally agree with their supporting comments.
S_23	Kāinga Ora – Homes and Communities	S_23_05	Support	HBHG support their submission point to remove references to ‘public safety’ in the objectives and policies. We generally agree with their supporting comments. HBHG consider that the Operative objectives and policies already address public safety matters through various policies and assessment criteria that seek outcomes for attractive and safe streets and public open spaces, and passive surveillance, eg. RESZ-P3 and assessment criteria CCZ-MC1 and CCZ-MDA.
S_24	Ara Poutama Aotearoa, the Department of Corrections	S_24_09	Oppose	HBHG oppose their submission point to delete new Rule CCZ-R17A. HBHG support the proposed new rule for the reasons in Council’s Section 32 Report.
S_23	Kāinga Ora – Homes and Communities	S_23_02	Oppose	HBHG oppose their submission point to amend the definition of Community Housing as per their submission. HBHG support the proposed definition as notified for the reasons in Council’s Section 32 Report. We note that the current Operative definition already excludes “facilities where the movement of residents is legally restricted”. The Operative Plan is already clear in making this distinction. The proposed changes as notified will provide further clarity to an existing core component of the existing definition.

S_23	Kāinga Ora – Homes and Communities	S_23_11	Oppose	<p>HBHG oppose their submission point to remove the proposed amendment to Rule CCZ-R17 as notified. HBHG support the reasons for this in Council’s Section 32 Report in principle. Additionally, whilst we acknowledge that the city centre is typically well suited to higher intensity activities, we note that Council have identified issues of concern with the effectiveness of the existing Community Housing provisions in being able to deal with the range of potential environmental, social and economic effects from such activities in the Rotorua city centre. The effects, from such activities of unlimited scale, including their cumulative impacts, have the potential to detract from and work counter to the strong vibrancy and vitality outcomes sought for the CCZ by the Operative CCZ policy framework.</p>
S_23	Kāinga Ora – Homes and Communities	S_23_13	Support	<p>HBHG support their submission point to retain the proposed amendment to Rule RURZ-R17(1) as notified. HBHG support the reasons for this in Council’s Section 32 Report in principle.</p>
S_23	Kāinga Ora – Homes and Communities	S_23_14	Oppose	<p>HBHG oppose their submission point of having a restricted discretionary activity status instead of discretionary for Community Housing in the RURZ as notified. We consider that it would be a confusing outcome to allow and prioritise such activities of scale as being more anticipated in the rural areas than Visitor/Tourist Accommodation activities which are provided for as a discretionary activity. The Operative RURZ policy framework recognises that the rural zones allow a broad range of activities to take place and specifically recognises that tourist attractions and tourist accommodation are provided for in that mix. Introducing lesser activity statuses for other activities like Community Housing, would create confusing expectations on the treatment of activities such as Visitor/Tourist Accommodation that will remain regulated and anticipated by the Operative RURZ framework.</p> <p>HBHG note that Community Housing exceeding 8 persons, is already a non-complying activity under the Operative RURZ framework. Such activities can have significant adverse effects on rural character and amenity, through reduced levels of open space, over intensification in housing development, increased traffic levels and artificial lighting. Such activities can also risk creating ‘out of zone’ development, and development that is unconnected with</p>

				the rural economy. A non-complying activity status should therefore be retained as per the Operative plan.
S_24	Ara Poutama Aotearoa, the Department of Corrections	S_24_10	Support in part	HBHG support their neutral position and relief sought with respect to retention of new Rule CCZ-R17A. HBHG support the proposed new rule for the reasons in Council's Section 32 Report.
S_24	Ara Poutama Aotearoa, the Department of Corrections	S_24_11	Oppose	HBHG oppose their submission point regarding amendment to the activity status for Community Housing in Rule CCZ-R17(3). HBHG support the changes as notified for the reasons in Council's Section 32 Report. Additionally, whilst we acknowledge that the city centre is typically well suited to higher intensity activities, we note that Council have identified issues of concern with the effectiveness of the existing Community Housing provisions in being able to deal with the range of potential environmental, social and economic effects from such activities in the city centre. The effects, from such activities of unlimited scale, including their cumulative impacts, have the potential to detract from and work counter to the strong vibrancy and vitality outcomes sought for the CCZ by the Operative CCZ policy framework.
S_24	Ara Poutama Aotearoa, the Department of Corrections	S_24_13	Support	HBHG support their submission point to retain the proposed amendment to Rule RURZ-R17(1) as notified. HBHG support the reasons for this in Council's Section 32 Report in principle.
S_24	Ara Poutama Aotearoa, the Department of Corrections	S_24_14	Oppose	HBHG oppose their submission point of having a restricted discretionary activity status instead of discretionary for Community Housing in the RURZ as notified. We consider that it would be a confusing outcome to allow and prioritise such activities of scale as being more anticipated in the rural areas than Visitor/Tourist Accommodation activities which are provided for as a discretionary activity. The Operative RURZ policy framework recognises that the rural zones allow a broad range of activities to take place and specifically recognises that tourist attractions and tourist accommodation are provided for in that mix. Introducing lesser activity statuses for other activities like Community Housing, would create confusing expectations on the treatment of activities such as Visitor/Tourist Accommodation that will remain regulated and anticipated by the Operative RURZ framework.

				<p>HBHG note that Community Housing exceeding 8 persons, is already a non-complying activity under the Operative RURZ framework. Such activities can have significant adverse effects on rural character and amenity, through reduced levels of open space, over intensification in housing development, increased traffic levels and artificial lighting. Such activities can also risk creating ‘out of zone’ development, and development that is unconnected with the rural economy. A non-complying activity status should therefore be retained as per the Operative plan.</p>
S_26	Margaret Qu	S_26_01	Support in part	<p>HBHG part support their submission point with respect to their general desires for stronger regulation of emergency and welfare housing within the CCZ and seeking clear recognition in an objective and policy for promoting the primary function of the city centre for commercial, retail, tourism, and hospitality activity.</p>
S_26	Margaret Qu	S_26_01	Oppose in part	<p>HBHG oppose their submission point in support of the proposed change to discretionary activity default status in the CCZ. The reasons for this are as per our original submission. It appears this submitter may not be fully aware of the true impact that the blanket rule change will have on the range of unspecified activities in the CCZ. In summary, HBHG consider that the rule change will unduly restrict and create further uncertain consenting processes on the very activities that ought to be prioritised and enabled in the CCZ as per the Operative District Plan policy framework.</p>
S_21	Waikite Valley Community Collective	S_21_01	Support in part	<p>HBHG support their submission point with respect to their support of the exclusions within the community housing definition and their request that there needs to be improved clarity regarding exclusions for boarding houses and other forms of communal/shared housing within rural zones. We support their comments that having multiple people intensively living on one site in a rural zone may have an adverse effect on those who rely on the rural zone for their livelihood.</p> <p>We note that the Operative RURZ policy and rule framework already seeks to manage intensive activities of scale such as Community Housing exceeding 8 persons, by making such activities as non-complying activities. Such activities</p>

				<p>can have significant adverse effects on rural character and amenity, through reduced levels of open space, over intensification in housing development, increased traffic levels and artificial lighting. Such activities can also risk creating 'out of zone' development, and development that is unconnected with the rural economy. A non-complying activity status should therefore be retained as per the Operative plan. We believe a prohibited activity status does not follow an effects based approach and consider that a non-complying activity status still allows for the assessment of proposals on merit.</p>
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Table 1: Further Submitter Details

Name of Submitter:	McKenzie & Co Consultants Limited	
Contact (if relevant):	Darren Clark McKenzie & Co Consultants Limited 1284 Eruera Street, Rotorua 3010	
Address for service (email preferred)	darren@mcl.co.nz	
Phone number:	[REDACTED]	
Hearing attendance:	We do wish to be heard in support of my submission at the public hearing of submissions	
Willingness to present joint case at hearing:	If others make a similar submission, we will consider presenting a joint case with them at a hearing.	
Status to make a further submission:	<i>[Indicate which one of these criteria you meet to make a further submission and why:]</i>	
	Y	I am a person who has an interest in the proposal that is greater than the interest the general public has Mckenzie & Co Consultants Limited (MCCL) are a land development consultancy that handle a range of subdivisions in Rotorua. We provide our services to the local working rural community in particular. MCCL seek that PC 10 does not unduly restrict or create uncertainty for 'boundary adjustment' subdivisions, and that there are clear provisions for servicing/infrastructure requirements, to suit the growing needs for off-grid power and telecommunication solutions, to provide flexibility in how people may wish to live on the land, and to support sustainable subdivision design.
Signature:	<i>D.Clark</i>	
Date of Submission:	20 April 2026	

Plan Change 10 to the Rotorua District Plan – Definitions and Rule Refinements

Index to Further Submissions

Further Submission #	Submitter #	Submitter Name	Page
1	28	Te Tūapāpā Kura Kāinga – Ministry of Housing and Urban Development	1
2	23	Kāinga Ora – Homes and Communities	21
3	24	Ara Poutama Aotearoa – The Department of Corrections	26
4	25	Hao Boutique Hotel Group	33
5	22	McKenzie and Co. Consultants Limited.	41

Table 2: Original submissions supported or opposed

[Add additional rows to respond to submission points, as needed]

<p>Submission Number</p> <p><i>State the submission ID# for the original submission that you are commenting on (you can find this in the summary of submissions).</i></p>	<p>Submitter's Name</p> <p><i>State who made the submission that you are commenting on.</i></p>	<p>Section Reference (Submission Point)</p> <p><i>Clearly indicate which parts of the original submission you are commenting on – preferably use the submission point number in the summary of submissions. Use a separate row for each point you support/oppose.</i></p>	<p>Support/ Oppose</p> <p><i>State your position on the point made in the original submission, for example, whether you support, oppose or support in part, etc.</i></p>	<p>Reasons</p> <p><i>Explain the reasons for your support / opposition.</i></p>
S_04	Luke Nelson	S_04_01	Support in part	MCCL support their submission point in support of the proposed new definition of boundary adjustment. However, MCCL seek further refinement of the new definition to refer to 'site' in place of 'allotments'. The reasons for this are as per our original submission.
S_04	Luke Nelson	S_04_04	Support	MCCL support their submission point in opposition to the proposed changes to SUB-S11(1). Their submission covers matters and reasons that closely align with those raised in our original submission.
S_10	Ngāti Pūkiao Environmental Society	S_10_05	Oppose	MCCL oppose their submission point in support of the proposed changes to SUB-S11(1). We recognise that land fragmentation is an outcome of subdivision and has associated potential adverse effects in relation to such matters as lake quality, indigenous biodiversity, and rural production. However, for the reasons in our original submission, we consider that boundary adjustment subdivisions between adjoining titles, that may result in a lifestyle-sized lot, have less potential for the generation of significant adverse effects, given they move boundaries between existing developable sites. The Operative District Plan (ODP) recognises the distinction between these two different types of subdivision activities and deals with them through the assigned rules, activity statuses and sets of performance standards.

				The discretionary activity pathway of the ODP's subdivision provisions allows for all such associated effects of a boundary adjustment subdivision to be considered and assessed on merit. There are a range of assessment criteria and objectives and policies that already provide a clear framework for the assessment of such applications.
S_12	Stratum Consultants Ltd	S_12_05	Support in part	MCCL support their submission point in support of the proposed new definition of boundary adjustment. However, MCCL seek further refinement of the new definition to refer to 'site' in place of 'allotments'. The reasons for this are as per our original submission.
S_12	Stratum Consultants Ltd	S_12_05	Oppose	MCCL oppose their submission point in support of the proposed changes to SUB-S11(1). Their submission seeks further amendments for clarification purposes, regarding which rule framework would apply, and to improve clarity regarding the treatment of non-compliances. MCCL agree in principle, that the current amendments to SUB-S11(1) as notified, are not fit for purpose. We consider that they are not clear enough for Plan users to readily understand with confidence. However, MCCL consider the amendments proposed as part of our original submission (or similar) will help provide the required clarity and ensure the two rule frameworks (for boundary adjustment vs standard subdivision) are kept separate and not muddled together. The reasons for this are as per our original submission.
S_23	Kāinga Ora – Homes and Communities	S_23_01	Support in part	MCCL support their submission point in support of the proposed new definition of boundary adjustment. However, MCCL seek further refinement of the new definition to refer to 'site' in place of 'allotments'. The reasons for this are as per our original submission.
S_12	Stratum Consultants Ltd	S_12_06	Support	MCCL support their submission point and agree with their reasons which generally align with the reasons in our original submission.
S_23	Kāinga Ora – Homes and Communities	S_23_03	Support	MCCL support their submission point and agree with their reasons which generally align with the reasons in our original submission.

S_16	Chorus NZ Ltd	S_16_01	Oppose	MCCL generally support their submission point in principle, as it would apply to most serviced urban areas. However we oppose their relief sought, as it would still apply to rural areas that have no or varying forms of open access fibre. Their relief sought includes wording that uses vague terminology (“not reasonably practicable”). We do not consider that wording is readily measurable to determine compliance for the reasons as per our original submission. We consider the rural areas require more certain telecommunication standards for the reasons as per our original submission.
S_12	Stratum Consultants Ltd	S_12_10	Support in part	MCCL support their submission point in support of the proposed changes to SUB-S9(3)(C)(i). However, MCCL seek further amendment as per the relief sought in our original submission.
S_04	Luke Nelson	S_04_02	Support	MCCL support their submission point in support of the proposed changes to SUB-S9(3)(C)(i). Their reasons generally align with those in our original submission.
S_04	Luke Nelson	S_04_3	Support in part	MCCL generally support their submission point in support of the proposed changes and amendments to SUB-S9(3)(C)(ii). However, consider that further refinement of this provision is required, in light of the points raised in our original submission.