

**Before Independent Hearings Commissioners
Rotorua Lakes Council**

**In the matter of 13 applications for resource consent for
contracted emergency housing by Te Tūāpapa
Kura Kāinga Ministry of Housing and Urban
Development**

**Statement of evidence by Joanne Healy
Social Impact**

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Statement of evidence by Joanne Healy

1 Introduction

- 1.1 My full name is Joanne (Jo) Patricia Healy. I am a Social Impact Specialist and hold the role of Associate at Beca Limited. I work as a Planner and Social Impact Specialist.
- 1.2 I am the primary author of the Social Impact Assessment (**SIA**), supported by my social impact team. Amelia Linzey supervised the assessment process and was the specialist reviewer. The SIA formed part of the section 92 response for all 12 resource applications (known collectively as **'the applications'** by the applicant (Te Tūāpapa Kura Kāinga Ministry of Housing and Urban Development (HUD))). A 13th application was subsequently made relating to the Emerald Spa Motel and I address the social impact of operating that motel as contracted emergency housing in this evidence.

2 Qualifications and Experience

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

housing). This work included liaising with community providers of accommodation and respite facilities.

- 2.2 I have prepared or was otherwise involved (as specified) in undertaking Social Impact Assessments (SIAs) for a number of infrastructure, social service and land use matters, including the following:
- (a) The change in designated use for the establishment of a Youth Justice facility at the existing Whakatakapokai site (co-author), for Oranga Tamariki.
 - (b) The alteration of designated use for the continued operation of Korowai Manaaki Youth Justice facility (co-author), for Oranga Tamariki.
 - (c) Peer review of the Social Impact Monitoring Report for Wiri Prison (social impact review team), Auckland, for Ara Poutama Aotearoa / Department of Corrections (Ara Poutama or the Department).
 - (d) Resource consent application to establish a rehabilitative and reintegrative residential accommodation programme within an existing property in a residential zone within Christchurch (co-author) for Ara Poutama.
 - (e) Baseline social impact study of Tai Aroha, an operative rehabilitative and reintegrative residential accommodation programme within a residential zone in Hamilton (co-author) for Ara Poutama.
 - (f) Peer Review - Ohinewai Plan Change Submissions (residential, commercial and manufacturing zoning of rural land), for Waikato District Council (including preparation and presentation of hearing evidence);
 - (g) Queenstown Arterials Notice of Requirement (Lead Author), for Queenstown Lakes District Council (Fast Track Consent Process – including developing conditions and responding to panel queries);
 - (h) Southern Rail Stations Notice of Requirement and Resource Consent (Lead Author) - Auckland, KiwiRail (for Te Tupu Ngātahi (Supporting Growth Alliance)) (Fast Track Application));

- (i) Bothamley Park Sewer Replacement Resource Consent Application (Lead Author), for Kāinga Ora - Wellington (Fast Track Application) (Lodged);

3 Code of conduct

- 3.1 While I acknowledge this is a Council-level hearing, I have read and am familiar with the Environment Court's Code of Conduct for Expert Witnesses, contained in the Environment Court Practice Note 2014, and agree to comply with it. My qualifications as an expert are set out above. Other than where I state that I am relying on the advice of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

4 Scope of evidence

- 4.1 My evidence addresses the social impact of the operation of contracted emergency housing in Rotorua and is structured as follows:
 - (a) SIA methodology.
 - (b) Summary of key SIA findings.
 - (c) A review of the Emerald Spa application.
 - (d) My comments on to the section 42A report.
 - (e) My comments on submissions.

5 Summary of evidence

- 5.1 My evidence summarises the SIA. In addition to this, I have commented on aspects of the section 42A report including SIA evidence (Ms. Foy) and submissions. This has included highlighting and discussing differences of approach to the impact assessment – where relevant, considering and answering further issues and questions raised where these were not previously considered in the SIA, and considering impacts raised by the community that were not previously assessed.
- 5.2 In relation to the section 42A and specifically evidence by Ms. Foy, my evidence covers the key differences between my approach and that of

Ms. Foy, in particular in regard to scope and use of baseline (defining the existing environment from which the assessment has been made). In summary, this relates to what ‘the proposal’ should be assessed against, or a baseline – with the approaches including the current social environment (my approach) or a social environment without any forms of emergency housing (Ms. Foy’s approach). Following this, in my view, there is a difference in what activity is being considered as part of the application: the CEH only (my approach) or the CEH and other forms of emergency housing (Ms. Foy’s approach). Finally, the difference in approach also raises a question as to whether the behaviour of community residents of emergency housing outside of the 13 CEH sites is also ‘in scope’. I have where possible considered questions put forward by Ms. Foy, where I consider these are relevant to the application. This includes further consideration of potential outcomes of declining the application and comparison of the uses of application sites for CEH against other plausible uses defined under the permitted baseline or consented activities.

6 Social Impact Assessment Methodology

- 6.1 The full description of the SIA methodology is available in Section 3 of my report. This is a summary of that section of the report.
- 6.2 The social impact assessment set out to understand how the proposed applications for use of motels as Community Emergency Housing (“CEH”) would socially impact the existing environment from which they began operating. To enable this assessment the following work was undertaken:
 - (a) Scoping the proposed project, the communities of interest and context of the proposal.
 - (b) Gathering information on the community and proposal.
 - (c) Profiling the existing environment – The SIA investigated the existing social conditions in which the CEH motels commenced operation. I consider it appropriate that the social conditions as at July 2021 (pre-commencement of CEH) is an appropriate baseline from which potential social impacts arising from the use of the 13 motels for CEH are considered and assessed. I discuss this matter further in response to the evidence of Ms. Foy and her evidence.

6.3 The data collected for the community profile identified a range of complex social conditions, including changes and challenges the community has experienced over the last few years. These conditions form social impacts being experienced by the community and in which the CEH motels began operating. The communities' experience of social impacts arising from the proposed CEH motels are not easily separated from these wider social conditions and impacts. For this reason, and to provide an explicit assessment of the potential impacts of the CEH proposal (the matter over which consent applications are sought), the assessment described these general social changes observed and reported on by the community in this 'existing environment'. It was from this base, that the potential social impacts of the CEH applications, were collectively assessed. In summary, the impact assessment considered the potential for the applications to:

- (a) improve existing social conditions – reducing overall impact: **positive impact**
- (b) maintain the status quo – does not improve the existing social conditions nor makes it worse: **negligible impact**
- (c) exacerbate the existing social conditions – potentially negatively contribute to the existing environment e.g. further exacerbating existing issues or new social issues arising: **negative impact**

6.4 The SIA assessed potential social impacts on:

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

- (g) *Health and wellbeing* - health is a state of complete physical, mental, social and spiritual wellbeing and not merely the absence of disease or infirmity.
- (h) *Fears of safety* – sense of safety.
- (i) *Community aspirations* – future aspirations of the community.

7 Social impact findings

- 7.1 The SIA found that the applications would have potentially low positive to low negative social impacts (with mitigation) on the existing environment.
- 7.2 Overall, I concluded that CEH would result in some increases in positive outcomes and some increases in negative outcomes, such that overall it would not substantially change the existing social conditions for the wider community.
- 7.3 Positive potential impacts identified were assessed as more likely where managerial inputs (improved reliability of maintenance of building and grounds, wrap around support services, operational rules, security services) resulted in improved operating conditions (including operational systems to manage the interface of CEH occupants of motels and the wider community and/or maintenance of sites), reducing impacts for neighbours and the surrounding neighbourhood.
- 7.4 Overall there were also positive outcomes for those in the community (noting this population is one of the most vulnerable sectors of the community, often with limited agency) residing in these facilities due to increased stability of the provision of accommodation, specified target population of sites, and systems to ensure upkeep of property, security and support services.
- 7.5 Negative impacts identified were assessed as more likely where the CEH motels were clustered within close proximity to other forms of emergency and transitional housing and other contracted motels, due to increased likelihood of incidents and subsequent social impacts for the surrounding neighbourhood.

- 7.6 A summary of the potential social impacts, distribution and assessment is provided in Attachment 1. The full assessment is available in Section 6 of my report.
- 7.7 The impacts of each site and the whole 12 sites collectively were assessed. No additional or cumulative impacts were identified in relation to the potential of consenting additional CEH motels (e.g. the 13 CEH motels as now being sought). 11 of the CEH sites (due to the addition of the 13th application it is now 12 of the CEH sites) already supplied, at least in part, emergency housing through Emergency Housing – Special Needs Grants (EH-SNG), or another form of emergency housing. I concluded that the applications for CEH motels therefore did not significantly add to the overall number of suppliers of emergency accommodation. Furthermore, the other site¹ (not previously supplying EH-SNG accommodation) is not within the central cluster of accommodation. Therefore I considered that it was not likely it would contribute to cumulative effects (I return to this issue later in my evidence as it is a difference in the assessment conclusions reached between myself and Ms. Foy).
- 7.8 The above discusses the potential impacts of approving the application for 13 CEH motels. Without these CEH motels I considered that it was reasonable to consider that the demand for emergency and transitional housing in some form would continue. This was evidenced by the increase in EH-SNG and public housing applications over the last few years. Housing supply shortages indicate it will take many years to rectify. Therefore, I identified that the potential impacts of not allowing the CEH motels to operate would not improve the current social conditions / characteristics being experienced (which was in part generated by social conditions arising from housing shortages and an increasing population with insecure or inadequate housing / shelter (see Section 5 - Existing Environment, Beca SIA) within Rotorua. Furthermore, I concluded that the absence of the CEH activity may result in further negative social change, particularly for vulnerable members of the community (noting there would likely be negative impact for the local/wider community also). This could include increased homelessness or unstable living conditions for vulnerable members of the community and experiences of increased

¹ Noting there was two but one of these sites has subsequently been removed from the application.

numbers of people living in public spaces or similar, for the wider community.

- 7.9 In light of the finding of some potential for negative impacts, particularly for neighbours, associated with the CEH activity, but within the context of the social conditions set out above, I concluded that consideration of how to minimise potential impacts of emergency housing on the surrounding community was appropriate. In my opinion, contracted emergency housing does this. Contracted emergency housing separates emergency housing use from the provision of tourist accommodation and improves the care of families and vulnerable adults receive while in emergency housing. The operating model provides a management regime that provides opportunity to reduce potential impacts on the neighbours and local community; through the management of the sites.
- 7.10 To optimise the ability for CEH motels to minimise potential adverse social impacts identified I made the following recommendations, particularly focusing on how these could improve the integration of the sites to the surrounding areas / neighbourhoods in which they operate:
- (a) Quality permanent fencing and gates (removal of cones and other temporary blockades) to be more in keeping with the character of the tourist accommodation environment in which the activity is proposed to be located.
 - (b) Enhancement of landscaping to soften any security provisions (as per above) and to provide further privacy screening where practicable.
 - (c) Improved management of on-site and offsite parking to prevent staff parking out the front of the site on the driveway or berm/footpath.
 - (d) On-site dedicated play areas for children on-site or alternatively residents being supported to access local parks within close proximity and supported to access these.
 - (e) A 24/7 0800 number to be provided to neighbours to contact the service operators/security on-site, to enable them to raise any concerns and / or lodge complaints and queries, with a formal

response process in place to respond to neighbour communication.

- (f) A forum for the community to enable them to ask questions of and receive information regarding the overall CEH service.
- (g) A process for scheduling visits (where visitors to CEH sites are allowed by operators) and a maximum number of visitors on-site at any one time.

7.11 Overall, and within the context of the social change that is being and has already been experienced in Rotorua (with increased homelessness and demand for housing and other social drivers) my assessment concluded that the CEH motels are not significantly contributing to adverse social outcomes. Furthermore, compared to a counterfactual of no CEH then I consider the activity is improving social outcomes overall, that is, relative to the current and reasonably foreseeable alternatives for emergency housing provision or if no alternative housing option is provided. Further, there are measures available (as outlined above, and further added to in this evidence below) to improve the operational interface with the wider neighbourhood and therefore, potentially the perceptions and experiences the community has of these facilities and those members of the community residing in these facilities.

8 Emerald Spa Motor Inn

8.1 This motel was not part of the original SIA. However, I have reviewed the application and make the following observations:

- (a) The site is part of the existing environment in that it was already providing emergency accommodation at the time of assessment.
- (b) I consider my SIA of CEH sites in relation to the Glenholme area and Fenton Street can reasonably be applied to this site.
- (c) The original SIA engaged with stakeholders and community members from Fenton Park – the local community within which this motel is located. Information was not specifically sought per motel but did specifically cover this locality and as such, I consider it can be considered as applicable to this site.

- (d) Due to its location on Fenton Street, the site will contribute to the concentration of other CEH sites in this area. Therefore, I consider the proposed activity may contribute to the potential impacts identified in the SIA report, specifically in relation to where sites are clustered together along Fenton Street. I concluded that the specific mitigation proposed on some sites may be applicable to this site, including being part of the recommended 0800 contact number, community forum and visitor management measurements.
- (e) Overall, I do not consider that the operation of a 13th motel for CEH increases the social adverse effects of emergency housing.

9 Section 42A Reports and Supporting Evidence

Evidence of Rebecca Foy – Social Impact Analysis and Social Impact Review

Overall methodology – Scope of assessment

- 9.1 Both Ms. Foy and I agree that the effects of CEH are difficult to untangle from the surrounding environment which includes the operation of emergency housing in the form of people using EH-SNGs. However, from that point our approaches to achieve the assessments of social effects differ. As per my scope I have limited my assessment to the applications currently being considered – specifically the 13 CEH motels. In comparison, Ms. Foy has assessed the social effects of the CEH motels and use of motels more broadly for EH-SNG collectively. For that reason, I do not consider that the findings of our two assessments are directly comparable.
- 9.2 As I understand her evidence, Ms. Foy. is of the opinion that the social effect of operating all the CEH and EH-SNG motels should be collectively assessed (Ms. Foy – Paragraph 19). Ms. Foy considers that by not doing so the cumulative effect of both these activities has not been considered (Ms. Foy – Paragraph 22). To be clear, my SIA does include comment and assessment of social conditions arising from other forms of emergency housing and other social conditions within Rotorua (Section 6 sub sections 6.1.1, 6.2.1, 6.2.4, 6.3.1, 6.4.1, 6.5.1, 6.6.1, 6.7.1 and 6.8.1 titled ‘general social change’). However, I have not included them in the

overall social impact assessment of the current consent applications being sought, while I understand Ms. Foy has.

9.3 I note that CEH motels make up 23% of the motels currently being used in some form for ‘emergency housing’ and have been since around July 2021 (noting the majority of sites converted from a form of EH-SNG use). The CEH in comparison to emergency housing through EH-SNGs (and other models of emergency accommodation) is servicing a specific target population and has a different operating model. Given that only CEH motels are the subject of the current consent applications, I consider it is appropriate that the effects of these activities (as distinct from the wider social conditions) are assessed separately from emergency housing in general. While I acknowledge that there are social impacts arising from housing shortages, increased homelessness, and the emergency housing operation generally, I remain of the view that the decision to either consent (or not) the 13 CEH applications will neither generate nor avoid this wider scope of social impacts being experienced.

9.4 I do not accept that my approach (and use of a different baseline) “downplays²” or “disregards³” social impacts that can reasonably be considered as part of this application.

Use of baseline

9.5 I have used the existing social environment as of June 2021 (prior to CEH motels commencing) as my baseline for assessment. This is the social environment occurring within the community at the time CEH motels first started operating. This enables me to consider how the social environment experienced by the community will change by consenting (or not) the application. My approach considers the scope of the application against the actual environment experienced by the community at the time the CEH motels commenced operation. I consider this is reflective of the application, as they came into an environment that was experiencing social impacts of emergency housing and some of the key issues were:

(a) Co-use of motels for commercial use and emergency housing.

² Evidence of Ms. Foy Paragraph 88

³ Evidence of Ms. Foy Paragraph 23

- (b) Management of motel sites being used for emergency housing provision, including behaviour of residents in these sites and beyond and on-site and surrounding amenity.
- (c) Not separating out families and vulnerable youth and adults from other recipients of emergency housing.

9.6 On commencement, I understand the CEH activities relocated people from EH-SNG accommodation into the CEH sites (rather than adding additional people to the environment). The counter-factual I have assumed is that if the CEH sites are not provided for, people would return to emergency housing provision via alternative means including EH-SNG. It is on this basis that I concluded that the CEH activities do not substantially change the current social conditions, (hence they have little impact on the current social environment), though I do consider they may be able to improve some aspects (such as how sites are managed), at a site specific level. I remain of the view, without being presented a more detailed alternative option to assess, that if the CEH were not provided for, it would not mean the local and wider community would stop experiencing impacts. I would observe that, if both CEH and EH-SNG emergency housing provision were not provided for, this would also not remove the social conditions arising from of housing shortages, members of the community without adequate housing and in vulnerable housing conditions or otherwise needing housing / shelter.

9.7 Ms. Foy does not believe I have used the appropriate baseline (paragraph 131). The reasons given (taken directly from the evidence of Ms. Foy) are:

- (a) *“The SIA disregards the evidence of neighbours and community members about adverse social effects by adopting this baseline (paragraph 23)”.*
- (b) *“.....that finding significantly understates the likely negative effects on the health and safety wellbeing outcomes for the wider community, and this is due to the baseline for the SIA being inaccurate (paragraph 129)”*
- (c) *“the Beca survey does however highlight a range of issues that the wider community are experiencing. However due to the approach*

they have used to define the permitted baseline, they have downplayed many of those experiences as being of baseline, they have downplayed many of those experiences as being of less importance than they should have been afforded... (paragraph 254)".

- 9.8 Ms. Foy assesses all CEH motels, EH-SNG motels and all community experiences the community attributes to emergency housing occupants happening within the public domain against a *"Permitted Baseline"* – this is an environment that only contains activities that are permitted under the operational district plan (ODP) or are consented. It is unclear if this is an environment that is likely to exist today or an environment described by the community that existed pre-COVID (the latter seems more likely as the former would require a more comprehensive review of how existing housing shortages would be met without CEH and EH-SNG activities).
- 9.9 Ms. Foy suggests that the baseline should reflect the community values which are in Vision 2030, the draft Community Safety Plan, and the objectives and policies in the Operative Rotorua District Plan ("ODP") as described by Mr. Batchelar in the planning evidence.
- 9.10 Based on my understanding of Ms. Foy's approach, the difficulty I see from a social impact perspective is that it presents an artificial environment. Specifically it does not recognise the likely social impacts/consequences of Rotorua's wider issues people are currently living with. That is issues pertaining to the demand for housing not being met (homelessness), poverty and COVID (as described in the evidence of Mr Eaqub). These exist with or without the current provision of emergency housing.
- 9.11 To my mind, Ms. Foy's recommended approach poses a real difficulty in adopting a realistic 'counter-factual' as it is necessary to consider what would likely and realistically happen to the demand for emergency housing in an alternative scenario of such housing not being provided. For example, what is the likely outcome resulting from an increase in the proportion of people without any form of accommodation (e.g. sleeping 'rough', in cars and parks or similar) or what is a 'reasonable alternative' given the social service provision that agencies might be expected to adopt (temporary shelters etc).

9.12 In this respect I consider I have fulfilled the key steps for undertaking a SIA outlined in paragraph 40 of Ms. Foy's evidence:

“(a) Understanding the key elements of the likely changes.

(b) Understanding the social baseline or current situation, including understanding important values in the community such as the ODP's objectives and policies.

(c) Estimating the likely social wellbeing effects by comparing the current and future situation allowing for different change options.”.

9.13 However, if I were asked to consider the potential social impacts of approving the application (operation of 13 CEH) within an environment in which other emergency housing demand is not met by EHSNGs, my opinion is as follows:

- (a) there are social effects that are arising both from the need for emergency housing and from the provision of emergency housing. However, relatively speaking, I consider that CEH provides a greater opportunity to mitigate some of the social impacts arising from emergency housing provision (i.e. relative to not managing it at all);
- (b) if CEH were operating across the 13 motels (the subject of this consent) and the EH-SNG were not, whether the social outcomes overall would be less or greater, depends on what realistic counter-factual could be established to address the remaining substantial demand for emergency housing (where the current members of the community reliant on EH-SNGs would be 'shifted to'). In my opinion, I can envisage circumstances where the potential social outcomes of this scenario could be more adverse (e.g. temporary housing facilities, emergency shelters, or if no housing options were provided or if those in that community were simply asked 'to wait' for new alternative housing to be built).

9.14 Beyond that, I do not consider that Ms. Foy has assessed the applications in the manner she has proposed and remain of the view that assessing an alternative counterfactual from that presented in my SIA is significantly more complex than simply comparing the impacts of the CEH and EH-

SNG motels against social conditions from 2-plus years prior which no longer exist.

Alternate use of sites

- 9.15 I do not believe it is possible to go back in time to compare the use of CEH with a time the sites did not provide for any EH-SNG guests, which I believe Ms. Foy has (in addition to Ms. Foy including sites used for EH-SNG in her assessment). However, on reflection I feel that in my report I did not fully consider the social impacts of CEH against the permitted or consented alternate use of sites (noting however, that I also consider that Ms. Foy has not done this).
- 9.16 Below I give consideration to the effects of the CEH sites against other uses of these sites if the application is declined. This focusses solely on the sites themselves and not the wider use of other motels, as this is not the subject of this application. It is presuming they will be precluded from providing EH-SNG accommodation (I am uncertain this is the case but as the effects of this use have already been described I will focus on other uses). I acknowledge that I cannot determine how the sites would be used if not operating CEH but explore the options they have. I also note the following does not give consideration to where people from the community currently living in these sites would reside under this hypothetical state; these scenarios do not remove the needs of these community members (those defined as homeless).
- 9.17 I have considered 'tourist accommodation', 'community housing' and the sites remaining vacant (the motel closes) as potential (and realistic) alternative options for these sites (noting that these options may apply to some sites and not others and there may be additional activities not considered here)⁴.
- 9.18 Concentrating on the definition of tourist accommodation from a social perspective I note the key differences in comparison to sites being used as CEH are:
- (a) occupancy (through consent CEH is likely to have a lower maximum occupancy rate than what is allowed under tourist

⁴ Definitions and applicability of these activities per site are described and explained in planning evidence of Ms. Blackwell. It is noted that tourist accommodation is not restricted to motels and in addition includes hotels, boarding houses, private hotels, tourist house licensed premises, guest houses, backpacker lodges, youth hostels and similar accommodation. Tourist Accommodation does not include Bed and Breakfast or Holiday Rental Accommodation.

accommodation – albeit it some people may be staying in the accommodation for longer periods);

- (b) CEH has security and support staff on-site;
- (c) CEH have on site behavioural rules and site maintenance requirements as part of the contract;
- (d) Some CEH sites limit all use of alcohol;
- (e) CEH sites restrict or prohibit visitors (noting both uses do not allow overnight stays);
- (f) under tourist accommodation people have to have an alternate permanent address; and
- (g) under CEH sites are limited to those who are defined as requiring emergency accommodation and are a family or vulnerable youth or adult.

9.19 On reflecting on the above I am of the opinion that the main difference to how these activities could be experienced (and resulting social impacts) differently by neighbours and the local community is how these sites are managed (both the behaviour of people on site and the physical site). For example motels, hotels, boarding houses, private hotels, tourist house licensed premises, guest houses, backpacker lodges, youth hostels could elicit a range of negative and or positive social effects depending on behaviour of clientele, purpose for staying and management of site (appearance and operations).

9.20 I think it is reasonable to accept that if a CEH motel is run poorly and a private motel is run very well, comparatively there are more negative effects from CEH. Similarly if CEH are being run well and a boarding house/backpackers or motel is being run poorly it is reasonable to accept that comparatively tourist accommodation would have more negative effects in comparison.

9.21 The use of these sites for 'Community Housing' would be of a much smaller scale (e.g. 8 people including staff) when compared to CEH and it is reasonable to consider this is only practicable for the smaller sites. In these scenarios it does not preclude people with substance abuse issues and other complex needs being accommodated. The experience of

neighbours will depend on the management of the site, as I suggest is the case with CEH but acknowledging this is at a larger scale.

- 9.22 A vacant premises would remove people from site (not necessarily the local community). If it is not maintained or the site made secure it could detract from the amenity of the area and attract anti-social behaviour. It may overall improve the experience for immediate neighbours however for the local community it may cause negative social impacts.
- 9.23 In all these scenarios, this is only for this immediate site and I note that this does not address the wider social issues/impacts arising from community members requiring emergency accommodation from Rotorua or other sites operating as emergency accommodation.
- 9.24 In addition I believe the following would have to be considered (I acknowledge some of this has been covered in my assessment but expand on this here) with regards to potential outcomes of declining this application:
- (a) Where the 'homeless' members of the community (residing in the CEH motels) might then go – how / where they would be absorbed by the local or wider community.
 - (b) Declining this application does not change the use of other sites not part of this application but within these neighbourhoods (e.g. either emergency accommodation using EHSNGs or other use of motels for longer term temporary accommodation for the housing vulnerable), nor change the need for emergency accommodation.
 - (c) Declining these sites only changes what is likely to happen within these sites – it is not likely to change what is happening in the public realm (offsite).
- 9.25 Ms. Foy and I agree this is likely to result in perverse outcomes for community members residing within CEH sites currently and those in the future who may require CEH accommodation.
- 9.26 Put simply, by shutting down the sites without established solutions (which have not been presented to be to date), the social issue of homelessness does not reduce, rather it is most likely transferred to other Rotorua locations. The CEH motels are trying to reduce homelessness numbers

and encourage families to move from EH SNG to decrease the need for use and reliance on uncontracted motels. I understand that to date 597 households (this is family units, couples or individuals) have been in contracted emergency housing since July 2021, 76 have transitioned to transitional housing to public housing, 50 to private rentals, 39 to family homes and 29 to accommodation options outside of Rotorua. That indicates that 32% have been rehomed.

- 9.27 Whilst the potential outcomes for homeless community members residing within CEH sites has been discussed, I have reflected that I have not fully explored the potential impacts of those scenarios on the local community (of which neighbours are a part of) and wider community (excluding the homeless themselves). Specifically the following outcomes:
- (a) Increased demand and use of EH-SNG accommodation or even less stable forms of emergency housing (if this activity is also deemed to be not permitted).
 - (b) People living in crowded private accommodation.
 - (c) People rough sleeping.
 - (d) People living out of vehicles.
- 9.28 I consider it reasonable to consider at least in the short-term a large percentage of those from Rotorua will seek accommodation in motels relying on EHSNGs. Potentially increasing use and exacerbating social impacts on neighbours/local community and wider community associated with use of these sites. This is likely to be within the same local communities.
- 9.29 The impacts of homeless community members moving to overcrowded accommodation of family members or friends within Rotorua is the burden this places on those members of this community (the friends and family members). These are likely to include negative financial impacts, negative impacts on the amenity of their homes, living environment and health and wellbeing (due to crowded living environments).
- 9.30 Increased numbers of people living in cars and/or rough sleeping may have the following negative social impacts on local community, wider community, social services and businesses:

- (a) Increased incidents of crime or at least similar levels (potentially in other locations).
- (b) Negative impact on the tourist reputation of Rotorua due to visibility of homelessness in public and/or tourist spaces.
- (c) Increased incident of anti-social behaviour (as people are forced to remain within the public domain at all times) in public.
- (d) Greater demands on social services due to people not being housed and easily accessed for services.
- (e) Environmental amenity effects of public spaces where homeless people congregate/sleep (i.e. public parks/town centre).
- (f) Business impacts depending on where homeless people park/rough sleep and reside during the day (as this will be within the public domain).

9.31 These views are based on observations and reporting of issues of homelessness within Rotorua and other communities within New Zealand including the information gleaned from interviews conducted for my SIA. It is reasonable to expect that these will be much larger numbers than described pre-COVID as there is a recognised increase in homelessness numbers within Rotorua over the last two years.

Assessment of social impacts

9.32 Given that Ms. Foy and I have assessed two different scopes and I have discussed this at length, I will limit the following to what is directly comparable or requires further clarification.

9.33 Two key groups are identified by Ms. Foy as being impacted by these applications; homeless people needing accommodation and neighbours and the surrounding community of the motels providing CEH. In my opinion, I would identify six groups within the community who may experience potential impacts associated with the proposed CEH differently, these are: homeless people requiring emergency accommodation, neighbours to the facility, those in the local community surrounding the CEH facilities, the wider Rotorua community, business and social service providers.

- 9.34 Where Ms. Foy describes the negative effects of CEH motels on neighbours and the local community, I consider that she is in fact describing the collective effects of the wider provision of emergency housing including anti-social public behaviour within proximity of emergency housing. I caution against the approach of this all being attributed to emergency housing and suggest that consideration be given to what a site can reasonably be considered accountable for. I consider I have taken into account what can reasonably be considered as the effects of the CEH activity (activities on site).
- 9.35 Ms. Foy states *“the Beca SIA does not consider any other alternatives to using motels for CEH, and in fact concludes the CEH model is the best option to address housing supply issues (paragraph 96)”*. There are two statements to address here and I will deal with these separately.
- 9.36 First, I acknowledge that my SIA report did not consider alternatives, as they were not the subject of the consent application that I was asked to assess the social impacts of. As an aside, I note that options raised by Ms. Foy might more appropriately be the consideration of other agencies, including the Rotorua Housing Taskforce and themselves might appropriately be a matter for future consent processes. I do not disagree with Ms. Foy that alternatives to address adequate housing supply for the community should continue to be sought. I do not believe consenting these applications precludes this process from occurring.
- 9.37 I do not necessarily consider that CEH motels are the best or only option for addressing housing supply issues. As I have set out, I was commissioned to assess the effects of the proposal for initially 12 and subsequently 13 CEH activities. It was not the scope of my social impact assessment to consider whether this is the “best option”, but rather to assess potential social effects and whether there were opportunities to mitigate any potential adverse effects identified. I consider that my SIA has done this.
- 9.38 Further, I do not consider the current consent applications remove the need for those longer-term solutions to still be sought (or indeed address wider social issues pertaining to emergency housing in general). While I might ‘wish it to be so’, I remain concerned with the position that is suggested by Ms. Foy, that declining these applications will result in ‘the applicant’ finding better alternatives as it is my view that there is an

important need now and a multi-agency response required. My concern is that in the timeframe being considered here, the most 'feasible' alternative is either an increase in EH-SNG use or (if that is not available) in people being temporarily without secure accommodation.

Recognition of effects

- 9.39 The statement I made in the SIA: *“the use of motels for emergency housing in our assessment is the symptom of social issues within the community rather the cause”* articulates that the need for emergency housing is driven by wider societal issues of poverty, wealth inequality, housing unaffordability, higher costs of living, and housing shortages. The requirement of emergency housing is a symptom of these issues. However, this does not mean that it does not then cause its own impacts and I remain of the view that the SIA has considered these. If the wider social drivers identified could be resolved, the need for emergency housing would also reduce and therefore the impacts of emergency housing also. However, the reverse is not the case. Stopping emergency housing provision does not solve what is causing the need for it. As discussed above, I consider the issue of homelessness and the social experiences associated with this would remain and potentially increase. This is also not saying there are no other alternatives to emergency housing and that some of these might have fewer social impacts than the CEH proposed in these applications. However, if these are not currently available, I agree with the conclusion expressed in several submissions from community members receiving emergency accommodation, asking “where would they go?”
- 9.40 As stated in paragraph 26 of Ms. Foy’s evidence I have noted in my assessment that most Rotorua residents interviewed agreed that the homeless from Rotorua needed to be housed (I acknowledge there was not consensus on how this should or might be achieved). However, in my opinion this in no way implies (and it certainly was not stated), that this “absolved⁵” the applicant mitigating the impacts of their application. I strongly refute this statement from Ms. Foy. All I did was recognise that there are wider social issues arising from homelessness in Rotorua and that it is a problem that the community recognises.

⁵ Evidence of Miss Foy Paragraph 26

- 9.41 Ms. Foy has concluded in paragraph 99 that Beca's default position appears to be that local residents and near neighbours should accept current levels of disruption because that interruption is an inevitable consequence of providing a temporary solution for the shortage of social housing in Rotorua. On the contrary, I have made recommendations to mitigate effects where I consider these can assist to manage potential impacts. I have made further mitigation recommendations in this evidence, as a response to submissions as outlined in the submission section below. However, I remain of the view that there are limitations as to what service providers can achieve in terms of management of community members' behaviour when they are outside the consented CEH site (for example) and arising from wider emergency housing issues and the underlying social conditions and drivers that are giving rise to the demand for these housing needs. I recognise that there are ongoing social effects relating to short-term housing provision, emergency housing and rough sleeping (both for those in these facilities / conditions and for the wider community). I also acknowledge that there is anti-social behaviour in all communities and that social conditions (such as unemployment, low employment, transience, reduced school participation etc) can exacerbate and increase. However, not all anti-social behaviour can or should be completely attributed to residents of emergency housing, nor can the provision of emergency housing be considered 'the cause' of such behaviour. While I do not propose these are addressed through suggested conditions on these consents, this does not mean I think they should be tolerated nor that I think they should not be addressed. It is acknowledging that there is a limit to what can reasonably be managed by the consent and consent holder and those issues that require a wider and more collective response.
- 9.42 Ms. Foy (Paragraph 100c) has assessed that the SIA "significantly downplays" likely cumulative social effects of the aggregated emergency housing operations in Rotorua, which includes the CEH applications. I do not agree. Rather the SIA sought to identify whether the CEH applications will 'increase' or change the nature of social conditions because these are the subject of the current consent applications. In no way have I or do I intend to downplay or dismiss the communities' lived experiences of the wider social environment in Rotorua. The experiences expressed in interviews and submissions are realised lived experiences. Nor do I think the community needs to separate out their experiences and provide the

assessment of this application. However, it is the task of this application and the specialists providing information on this application, to understand the effects of CEH motels. The operation of EH-SNG motels is not the subject of this application nor can the conditions direct or manage the effects of these operations. Ms. Foy points out it is very complex to untangle the CEH application from the wider environment, but it is my opinion that this does not absolve the specialists from doing this nor does it mean it is reasonable that a consent holder should be required to mitigate wider social impacts beyond the activity for which consent is being sought because of this.

9.43 For the community, I acknowledge that these applications are the first formalised forum they have had to express their concerns about the social conditions they are experiencing. Whilst the current applications are for the CEH activities, I consider it is likely that most of their concerns relate to all and any emergency housing and in fact to wider social conditions being experienced (I think this is evidenced in the submissions received). The limitations of the scope of the application within the RMA context will likely not address all the concerns raised by submissions. I reiterate that because I have not assessed the effects of all issues associated with homelessness and / or emergency housing provision, it does not mean it does not exist, nor do I dismiss the impacts being experienced, or the need for it to be addressed by many stakeholders including HUD, albeit that I consider much of this is outside this application specific process.

Mitigation

9.44 I have turned my mind to the mitigations recommended by Ms. Foy, including those that I have also recommended in response to the submissions. Attachment 1 provides a table of these proposals and commentary. Overall, with mitigation I agree that the effects of CEH can be managed (noting this does not change the state of wider social issues including other forms of emergency housing). I am supportive of the following additional mitigation measures:

- (a) On-site play areas for children (this does not include support for restricting where children are placed – which I discuss below);
- (b) A centralised 0800 number for complaints to be managed outside the providers;

(c) Landscaping and site maintenance recommendations.

9.45 I do not support the following mitigations proposed by Ms. Foy (for the reasons set out in Attachment 2):

(a) Security staff presence to be highly visible.

(b) Limitations of placement based on age.

9.46 I consider mitigation pertaining to other forms of emergency housing (including any surveys or assessment of) and alternate management of homelessness to be out of scope for consideration.

9.47 The remainder of recommendations (see attachment 2 for rationale) need further consideration (I am neither opposed nor supportive), including:

(a) A Social Impact Management Plan (SIMP) and annual SIAs;

(b) Proposed surveys;

(c) How access to play space, school or parks is achieved.

10 Submissions

10.1 I have reviewed the submissions for all 13 applications and acknowledge the social changes individuals, families, groups, businesses and services have experienced, particularly over the last 2-3 years. As identified in the SIA, people experience the environment as a whole and are not likely to experience specific on-site impacts of the CEH motels (when they began operating as CEH) in a way that is easily distinguishable from everything else happening within their community. Therefore submissions largely report on the wider social conditions and further on what is happening off-site (e.g. public anti-social behaviour). In most submissions it is not evident that these activities are a result of the CEH motels as opposed to other housing or emergency housing or from the wider social conditions (which are acknowledged).

10.2 In the SIA I report on the wider social conditions described by submissions as part of the existing environment (Section 6 sub sections 6.1.1, 6.2.1, 6.2.4, 6.3.1, 6.4.1, 6.5.1, 6.6.1, 6.7.1 and 6.8.1 titled 'general social change') and as part of the community profile.

- 10.3 In responding to submissions, I do not repeat my opinion on issues that I consider have been addressed in my assessment and the above summary of findings. In this regard, I limit the following to matters raised that require clarification or have not already been assessed.

Way of life

- 10.4 Submitters report ways people avoid the Fenton Street area where there are CEH motels and other emergency housing providers. This has resulted in changes to people's way of life: where they walk, and how they get to work/school. I consider these issues were also raised and discussed / assessed in the SIA; from social research, general social changes as per the submissions were reported in Section 6.1.1 of my report. I have considered this impact already in my assessment (Section 6.1) and concluded that in relation to the existing environment, the CEH will potentially have a little or even no change (and therefore a 'negligible impact') on way of life for those outside of Victoria and Glenholme and potentially very low negative impact on way of life for neighbours and those within proximity of the CEH sites (e.g. within the Glenholme and Victoria area).
- 10.5 In addition to the above matters a few submitters raised the financial costs of seeking alternate transport to avoid walking where emergency housing is located (including CEH sites). I did not consider this as part of my assessment so do so here. This potential social impact appears to be concentrated in the Fenton Street area (based on reporting in submissions), and in particular impacts vulnerable members of the population (e.g. children, the elderly and or those with accessibility requirements), although not exclusively. No quantification of this impact is possible from the submissions. I note this is both a potential economic and a social impact. In the context of social impacts, it relates to impacts on the way people live in and move in their community. Again, it is likely that this impact is experienced as a result of wider social changes including increases in anti-social behaviour in the public realm. Though I acknowledge it may be attributed to specific behaviour of people within CEH sites. Therefore, I consider onsite behavioural management and provision of security and the mitigation recommended regarding fencing and screening will assist to address potential impacts associated with

behaviour of those within CEH sites, as will recommendations for increased on-site staffing (including weekends).

Tourism character and environmental amenity

- 10.6 I note that many of the submissions speak of economic impacts on tourism.
- 10.7 To the extent that they also raise social issues, I note the key themes are in relation to reputation, environmental amenity and the visibility of emergency accommodation in tourist areas and the impact on character and amenity. Considering the use of these facilities as CEH (rather than the wider issues of changes in use arising from other forms of emergency housing and COVID impacts on tourism etc) is in relation to the visual amenity of these CEH sites and the behaviour on site potentially detracting from tourism character. I consider this has been assessed and reiterate the recommendations put forward with regard to management of on-site behaviour and visual amenity. In response to the submissions I make the following further recommendations:
- (a) Removal of CEH sites from all booking websites and removal of motel signage and vacancy signs. Given the intention that these facilities operate for a 5 year period, I consider it is appropriate that they be modified to reflect their residential / social community function – rather than appearing like commercial accommodation.
 - (b) Staffing (in addition to security) in evenings and weekends to provide additional support to manage on-site behaviour.
 - (c) Monitoring of site maintenance.
- 10.8 Many submitters refer to the damage to the reputation of Rotorua as a desirable place to visit. I consider that the provision of CEH motels and management⁶ provided by consenting provides some opportunity to address reputational issues associated with emergency accommodation by:
- (a) Providing a mechanism to monitor sites.

⁶ This is relative to the informal use of motels for emergency accommodation.

- (b) Include upkeep and maintenance of site as part of contractual arrangements.
- (c) Separate provision of emergency accommodation from provision of tourism accommodation.
- (d) Provide independent avenues to raise issues and have an external monitor of responses.
- (e) Implementation of site rules that aim to manage visitors and on-site behaviour.

10.9 I acknowledge that this only addresses these sites and on-site issues, however these are matters which are within the scope of the application.

Community cohesion

10.10 This has largely been addressed in my report however submitters have raised that people are selling up and moving which results in the existing community losing long-term residents and in some cases family members. In addition employers have noted they are losing staff members. Reporting was mainly in the Fenton Street and wider Glenholme area. From the information provided by submitters it appears this pattern of behaviour has been happening for some time (pre-operation of CEH sites) and is due to a complex array of factors including potentially the loss of business activity in Rotorua as a result of COVID-19 and the consequential significant reduction in tourism activity, increased incidents of crime and anti-social behaviour in the public domain, however I am not aware of the factors contributing to these moves. This is unable to be quantified but a review of population data (Census 2018 and council data) indicated that Rotorua is going through population growth. CEH motels may not dissuade people from leaving (therefore not improving or changing the situation), however I remain of the opinion that they will not exacerbate the patterns of activities being experienced as a result of the wider existing social environment.

Offsite behaviour

10.11 It has been clearly articulated and well documented by submissions that many of the social impacts experienced within the community are related to anti-social behaviour experienced in the community (off-site of CEH

sites). This includes vandalism of community facilities including the racecourse, bowling club, local school and private property. Other issues raised include theft, trespassing and violent and intimidating behaviour, experienced by neighbours, local and wider community members and business owners.

10.12 Whilst the scope of CEH motels does not include management of CEH tenants' off-site behaviour (and could not be reasonably expected to do so), I have further considered whether there are additional matters CEH motels can address to limit on-site behaviour that may impact the local community. I recommend:

- (a) Reviewing boundary fencing and landscaping to prevent entry to neighbouring sites from CEH sites (recommendation of consultation with neighbours during this process). This may include additional physical security measures also, but these would need to be agreed with neighbours and not encroach on their privacy, breach reasonable expectation of privacy of people residing within the CEH sites or detract from the amenity of the local area.
- (b) Improved staffing (in addition to security) in evening and weekends for onsite management (recognising these are times where the most occupants are likely to be present on site).
- (c) A standardisation of house rules and complaints processes at all sites. To make sure there is not incidents of some sites having greater impact than others (due to different house rules re behaviour and visitors) or being less responsive to complaints.

Social impacts of not providing for the CEH activity

10.13 Most submissions opposing the applications indicate (implicitly or explicitly) that the declining of these applications would go some way to improve existing wider social conditions and improve existing social impacts. I think this may be the case for immediate neighbours of CEH sites or where a CEH sites is isolated from any other forms of emergency housing (although this assumes that the sites would not simply revert to emergency accommodation through EHSNGs).

10.14 However, I am of the opinion that it is unlikely to change the wider social conditions and, in some cases, exacerbate social impacts (or potentially move to other areas) for the following reasons:

- (a) There are no immediate alternate accommodation options (outside of the use of motels for emergency accommodation) for the entirety of this population.
- (b) The demand for affordable housing or social housing outweighs the supply in Rotorua. The need for social housing is growing not receding and predictions of increased costs of living, declining housing affordability and housing shortages are likely to exacerbate this.
- (c) Whilst local and central government agencies are developing solutions these are longer term.
- (d) A conservative estimate that around 70% of residents⁷ within CEH if not more will remain in Rotorua and continue to require emergency accommodation.
- (e) This application does not change the existence of other forms of emergency housing (including EHSNG motels) and social impacts associated with these.
- (f) It does not guarantee the return of the site to its pre-COVID use.
- (g) Social outcomes for those facing housing insecurity (some of Rotorua's most vulnerable population) would be negative due to social impacts of unsupported emergency housing, unstable/temporary housing or being without shelter.
- (h) Whilst the immediate environment may change if a CEH transitions back to tourism (this is not guaranteed), people are likely to reside in other emergency accommodation within the local area (with less agency for input and supervision) and / or there is potential for

⁷ Rotorua Emergency Housing Analysis - Ministry of Social Development Report 2021, report (69%) of clients were already living in the Rotorua TLA one month before entering Emergency Housing or had previously lived in the Rotorua District. A further 19% were living in a neighbouring TLAs one month before entering Emergency Housing, where often supply of Emergency Housing is limited. Of the 12% from outside these areas almost half had family in Rotorua and moved to be close to them, many living with them temporarily before requiring emergency accommodation.

there to be more incidents of rough sleeping or sleeping in vehicles.

Date: 5th October 2022



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Joanne Healy

Attachment 1: Summary of assessment of social impacts

Potential Impact	Description	Geographic extent	Impact of CEH on existing environment
Way of life	How people move around the local community by foot	Those who move around the proximity of the sites by foot	Negligible to very low negative - <i>more likely to negatively impact when clustered with other motels supplying emergency or other longer term occupancy</i>
Tourism Character	The impact on the tourism experience and reputation	Wider community	Negligible to very low negative – <i>more likely to negatively impact when clustered with other motels supplying emergency or longer term occupancy</i>
Residential Character	The impact of the CEH motels on the surrounding residential character	Neighbours and local communities (located in proximity of sites)	Very low negative
Community Services	How the CEH motels impact on the delivery of community services within the community.	Wider community	Low positive to negligible
Community cohesion and stability	How the CEH impacts how the community operates and the stability of the community.	Local and wider community	Negligible
Environmental Amenity	The impact of the CEH on the experience of the community environment.	Neighbours and local community within proximity of sites	Very low positive to low negative impact- <i>more likely to negatively impact when clustered with other motels supplying emergency or longer term occupancy</i>
Health and Wellbeing	Impacts on the health and well-being of the community	Neighbours and local community within proximity of sites	Negligible
Fears of safety	Impacts on sense of safety	Neighbours and local community within proximity of sites	Negligible to low positive impacts
Community Aspirations	Impacts on future aspirations of the community.	Local and wider community	Negligible

Attachment 2 – Review of mitigation recommendations by Ms. Foy⁸

Recommended mitigation	Opinion
Health and Safety	
Ms. Foy recommends on-site dedicated play areas for children (as per Ms Collins recommendations)	<p>I consider this would provide benefit for occupants but may conversely increase noise impacts for neighbours. Overall I am supportive of this condition, unless existing play facilities/recreation spaces are walkable (assuming this is roughly 400m of existing playgrounds and parks), where the alternative of providing facilities for occupants to access these areas (e.g. push-chairs and prams) might be a better alternative.</p> <p>I do not support Ms Collins' recommendation of limitations on where children of different ages can reside to achieve this (rationale (within a social impact context) is discussed under connectivity below).</p>
Ms. Foy proposed that security staff presence highly visible	<p>I do not support this option as I consider this has a potential adverse impact on the amenity of the environment both for residents and the local community and consider the security services can be discrete and effective helping sites blend into the surrounds and decreasing the surveilled feeling for residents of these sites. Further, I consider the provision of the 0800 contact number will provide immediate neighbours a form of 24/7 contact with staff regarding activity at the sites, without this requirement.</p>
Connectivity	
Housing young people and children near to schools and recreation facilities.	<p>Recognising that children may attend schools throughout Rotorua depending on previous enrolment I do not think this is an appropriate condition requirement. I note that CEH residents have access to a school bus to address tenant access to these facilities.</p> <p>Further I think there are potential adverse social impacts of limiting where children of different ages are placed based on play space on site, proximity to these community facilities:</p> <ul style="list-style-type: none"> - It may preclude some families from have access to CEH sites at all. - It does not recognise that some families may have children of multiple ages.

⁸ Noting these are only commented on in relation to the application "CEH sites" and preclude discussion of other forms of emergency housing.

Recommended mitigation	Opinion
	<ul style="list-style-type: none"> - It does not recognise where CEH families may have pre-existing community connections. - It limits the ability of Te Pokapū and social service providers to make decisions based on their expertise. Including consideration of cultural connections and specific socialisation challenges. <p>Furthermore, I remain of the view that this may be addressed by play spaces on site.</p>
Social cohesion	
A centralised 0800 number for complaints to be managed outside the providers	Support. I would however encourage operators to establish relationships with neighbours to help provide an open channel of communication and feedback as in the long-term this would be more beneficial
Community forum	Support. I would add in addition that the agenda includes information on: <ul style="list-style-type: none"> - Longer term housing plans - Wider response to emergency housing
Environment	
Landscaping and site maintenance recommendations	Agree with landscaping (needs to consider privacy and blending with the surrounding environment) fencing, removal of motel signage (including digital), site maintenance
Ms. Foy proposed an ongoing SIA reporting to Council and SIMP	<p>I am not opposed to the intent of these recommendations (only as they relate to CEH). However it would need to be clear that such SIMPS and SIAS relate to the CEH activity (rather than wider social change).</p> <p>I maintain that the following would be more appropriate:</p> <ul style="list-style-type: none"> - That CEH site operations are audited including survey of occupants to continue to assess needs of occupants are being met and operations are in accordance with operations specified in the application. - Annual reporting if complaints (including responses) and minutes and responses to issues arising from community meetings could provide the information in lieu of annual social impact assessments.

Recommended mitigation	Opinion
	<ul style="list-style-type: none"> - I think neighbours not spoken to in the SIA⁹ can be included in community meetings. <p>While I am not opposed to this recommendation, I do not consider it is necessary or a requirement for providing for this activity.</p>

⁹ It is noted that all residential neighbours of sites were provided an invitation (hand delivered to each houses mailbox – due to COVID issues) to contact the Beca SIA team. I note there may be reasons neighbours did not receive these.