

# Annexure 7: 3 Meade Street (Pohutu Lodge) – RC17661



*Figure 1: 3 Meade Street (as viewed from Meade Street)*

## **1 Introduction**

1.1 Resource consent to use 3 Meade Street for Contracted Emergency Housing (CEH) was lodged with Rotorua Lakes Council (RLC) on 13 August 2021. CEH is described in detail in the Application and in my Primary Evidence. To summarise, the Proposal is to:

- (a) Use all 14 existing motel units for CEH, primarily for whānau with children and vulnerable individuals (such as elderly);
- (b) Provide on-site support services for CEH occupants by a dedicated Service Provider. The Service Provider is currently Visions of a Helping Hand Charitable Trust, but the Applicant would like to retain flexibility so that an alternative Service Provider could provide the necessary Support Services if required.
- (c) 24/7 security on-site and an on-call Senior Security Officer;
- (d) Operate CEH from the site for a maximum of five years (from the date of the decision of the consent);

- (e) Revert back to a motel activity once the site is no longer being used for CEH.

## 2 Changes to the Application since lodgement

### *Maximum Occupancy*

- 2.1 Since the notification of the Application, the Applicant has revised the total maximum occupancy onsite, reducing this from 58 occupants to **42 occupants**.
- 2.2 CEH has been operating from 3 Meade Street since 1 July 2021. On 11 May 2022, Ministry of Housing and Urban Development (MHUD) provided to RLC (in response to a s92 request) updated information about the actual number of occupants on the site. This information demonstrated that the number of occupants is far lower than the theoretical capacity (of 58 people) if every bed in every unit was occupied. Updated actual occupancy is provided in Table 1 below.

**Table 1:** 3 Meade Street - Actual Occupancy Units (U) and People (P) December 2021 – August 2022

Date	15/12/21		7/02/22		30/03/22		27/04/22		23/05/22		30/06/22		1/08/22		30/08/22	
	U	P	U	P	U	P	U	P	U	P	U	P	U	P	U	P
No.	13	36	11	37	12	41	11	35	11	39	12	39	13	40	13	38

NB: All 14 units are contracted for CEH and 3 Meade Street has a maximum theoretical capacity of 58 CEH occupants.

- 2.3 The reality of CEH is that units are allocated to whānau based on their specific needs, and this does not necessarily mean every bed in every unit is occupied. As demonstrated in Table 1 above, the actual number of people onsite has varied between 35 and 41 people. While these levels are notably lower than the maximum occupancy of 58 persons that is now being sought by the Applicant, it is my understanding that reasons for low levels of occupation can vary – for example, on occasion, rooms are decommissioned for maintenance and repairs between whānau stays, and some rooms are set aside for emergency placements.
- 2.4 It is accepted that those staying in CEH are generally onsite longer than typical motel guests. As such, in terms of the potential intensity of use I

consider that a reduced maximum occupancy is appropriate and helps to mitigate the potential effects that could result from overcrowding.

### **3 Activity Status**

#### *Operative Rotorua District Plan*

- 3.1 The subject site is located entirely within the Commercial 4 zone. The Commercial 4 zone adjoins the site to the north, east and west. To the south is zoned Commercial 5 zone.
- 3.2 As discussed in my Primary Evidence, the activity has been assessed as a Non-Complying Activity pursuant to Rule COMZ-R1.

### **4 Site Specific Matters raised in Submissions**

- 4.1 The site specific s42A report by Ms Bennie provides an overview of the notification process and submissions raised. I note that many submitters made 'blanket' submissions which related to all Applications. As such, where the issues raised in submissions are relevant to all Applications, I have considered these issues in my Primary Evidence.
- 4.2 There were 308 submissions in relation to the resource consent at 3 Meade Street for CEH (including 16 submissions that were provided to the Independent Hearing Panel prior to notification of the application). Four submissions are considered specific to 3 Meade Street. An additional submission has been considered as specific to the site by the Council due to the proximity of the submitter's residential address to the site. Of the five submitters, three are associated with Whakarewarewa The Living Māori Village, one is associated with Te Puia, and one is a local resident. One submission is in support while the remaining site specific submissions oppose the Proposal.
- 4.3 The issues raised by the site specific submissions are reasonably generic, and can be broadly categorised as follows:
- (a) Social Effects
  - (b) Tourism Effects
  - (c) External Amenity Effects
  - (d) Internal Amenity Effects

(e) Cultural Effects

4.4 Submissions relating to social effects and tourism effects have been addressed in my Primary Evidence. No further discussion will be undertaken regarding these issues here.

4.5 Cultural effects have also been discussed in my Primary Evidence; however, I provide additional comments specific to the site at 3 Meade Street in my effects assessment below.

4.6 External and internal effects are not addressed in my Primary Evidence. These are discussed in my effects assessment below.

4.7 Overall, I agree with the analysis and conclusions within Ms Bennie's s42A report with regard to submissions received on this property.

## **5 Assessment of Effects**

5.1 My Primary Evidence discusses effects as they relate to all Applications. The following discusses effects specifically relevant to this site:

(a) Positive effects

(b) Cultural effects

(c) Character and amenity effects

(i) External amenity

(ii) Internal amenity

(d) Transportation Effects

(i) Parking and access

(ii) Traffic generation

(e) Noise effects

(f) Infrastructure

(g) Financial contributions

### ***Positive effects***

- 5.2 The positive effects of the Proposal are outlined in the Application and in my Primary Evidence.

***Cultural effects***

- 5.3 Pohutu Lodge is located adjacent to land on the same site as Te Puia, the New Zealand Māori Arts and Crafts Institute, the home of the national schools of carving (including pounamu and bone) and weaving. The Te Puia site spans 70 hectares within the Te Whakarewarewa Geothermal Valley, on the edge of Rotorua. Te Puia offers Māori cultural experiences, guided tours, function venue hire options and has an onsite restaurant. Submissions have been received from parties identifying themselves as being associated with the Whakarewarewa Village and Te Puia.
- 5.4 In terms of onsite operations, I understand that the Service Provider employs a Cultural Advisor, who provides CEH residents opportunity to develop and strengthen their tikanga, including Te Reo, Karakia, and Waiata. The Service Provider also runs *Tane Tu - Tane Ora*, which is a mentoring programme to support vulnerable tama who are accommodated in CEH. I further understand that the Service Provider provides a holiday programme that includes visiting the Te Puia site and uses this as an opportunity to educate tamariki about their local history. The Service Provider is committed to providing panui to all Pohutu residents to ensure residents are aware of the importance of the Te Puia site and ensure respect is shown to the site and surrounds.
- 5.5 I agree with Ms Bennie's assessment in the s42A report that to better understand potential cultural effects upon Te Puia and Whakerewarewa Village, it would be helpful to hear further from submitters in this regard. I note that the Applicant is interested to better understand their concerns to determine if there are further appropriate mitigation measures that can be offered.
- 5.6 Based on the information available to me, I am of the opinion that suitable conditions of consent can be applied that will mitigate the potential cultural effects resulting from the use of the site for CEH purposes. I anticipate that such conditions will be further developed through the hearings process.

***Character and amenity effects***

*External Amenity - Streetscape / neighbourhood character*

- 5.7 No changes are proposed in relation to the buildings and the AEE in the Application for 3 Meade Street remains valid in this regard.
- 5.8 Ms Bennie has recommended a condition of consent requiring the SMP be updated requiring site maintenance be undertaken to address concerns with adverse external amenity effects. I consider this will aid in mitigating external amenity effects and that it is appropriate to be imposed as a condition of consent.
- 5.9 Ms Bennie has recommended a condition of consent that existing landscaping be maintained and replaced where necessary. Landscaping was required as a condition of the previous motel consent. I consider this provides assurances in terms of mitigating potential internal and external amenity effects and consider it appropriate to be imposed as a condition of consent.
- 5.10 It is stated in the evidence of a number of experts that signage identifying the site as a motel should be removed to mitigate external amenity effects. Ms Bennie has recommended a condition requiring the removal of the signage. I agree that imposition of such a condition is appropriate.
- 5.11 In addition to the above, a number of experts of the Council and MHUD have recommended that all online advertising and websites that promote tourist accommodation and other services should be removed. I agree that such measures are generally appropriate.
- 5.12 Overall, it is my opinion that the external amenity effects arising from the use of the site for CEH purposes are acceptable.

*External Amenity – Cumulative effects*

- 5.13 Cumulative effects of 13 resource consents being considered concurrently is discussed in my Primary Evidence. This was also addressed in the s92 response, the Social Impact Assessment, and in the Evidence of Ms Healy and Mr Eaqub.
- 5.14 Specific to the 3 Meade Street proposal, I note that there are no other CEH facilities in the immediate surrounding environment. The closest CEH activity<sup>1</sup> is located approximately 110m northeast of the subject site, with a

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<sup>1</sup> Apollo Motel (site 13)

second CEH activity<sup>2</sup> approximately 300m northeast. As identified in Figure 2 of the site specific s42A report, there is a mixed tourism motel that also accepts EH-SNG directly to the north of the site.

- 5.15 The improvement to fencing and proposed removal of motel signage will assist in reducing any ambiguity around the nature of onsite activities and will help the site integrate more into the environment in which it is located. The Service Provider has confirmed that vehicles associated with the site do not park on the berms, and active onsite management minimises externalisation of effects from onsite activities.
- 5.16 My conclusion in relation to cumulative effects in my Primary Evidence are equally applicable here. Cumulative effects of the Proposal are considered to be acceptable and with the proposed management and mitigation are considered to be no more than minor.

#### *Internal Amenity*

- 5.17 Internal amenity relates to the quality of the onsite living environment for those staying in CEH, including access to onsite amenities typically associated with domestic living, open space and onsite services.
- 5.18 My Primary Evidence discusses how individuals are allocated to particular units, which among other matters, includes consideration of a unit's size, location, and onsite amenities to suit the requirements of the whānau or individual being homed.
- 5.19 Residents within CEH are accommodated on a relatively short-term basis (when compared with more permanent housing), with the length of stay varying between whānau groups. It is acknowledged, however, that the duration of stay is for a longer period than individuals who previously utilised the accommodation as motel guests. The provision of a quality and safe living environment is an important objective of CEH.
- 5.20 In undertaking this effects assessment, I also draw on the guiding principles within the relevant planning provisions applicable to the Commercial 4 Zone. The COMZ4 zone requires a minimum of 10m<sup>2</sup> (with a minimum depth of 2m) of outdoor open space to be provided per household unit<sup>3</sup>. This provides a helpful starting point in which to consider adequacy of open

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<sup>2</sup> Alpin Motel (site 1)

<sup>3</sup> COMZ-S5.

space; however, this must also be considered in the context that this standard is particularly applicable to site development resulting in permanent places of residence, as opposed to repurposed accommodation that instead serves as a temporary place of residence to the occupants. I also note that there are no guiding provisions regarding outdoor living space in this zone.

*Internal Amenity – Outdoor living space*

- 5.21 Access to onsite open space is one element that can contribute to a high-quality living environment. In my opinion, the extent and quality of the onsite amenity (including provision of open space) must be considered within the context of CEH providing a short-term place of residence for members of the community who otherwise have no tenable or better alternative accommodation.
- 5.22 It is acknowledged that there is minimal private outdoor living space on the site at 3 Meade Street. This has also been identified by Ms Bennie in her s42A report. Some of the units have semi-private or shared courtyards, and a small shared outdoor space is located towards the rear boundary of the site. Ms Bennie identifies that some of the outdoor areas do not appear well maintained and no outdoor furniture is provided.
- 5.23 Although the provision of outdoor living space is minimal, the temporary nature of the activity is a mitigating factor. Internal amenity can be further improved by site maintenance.

*Internal Amenity – Suitability for children*

- 5.24 The site does not have a dedicated children's play area. Some playground equipment is provided in the shared outdoor space. I note that the service provider provides off-site activities for tamariki. Given the onsite limitations regarding children's play space, Ms Collins identifies the site as unacceptable for children aged three to twelve years. It was rated as low for children thirteen to eighteen years. Ms Collins notes that fencing each courtyard would achieve a low rating for children aged six months to seven years.
- 5.25 The s42A report, informed by Ms Collins assessment, recommends restrictions on the use of units to accommodate whānau with children, or certain age-groups from particular units. In my opinion, such restrictions, while well intended, are misplaced in the context of a community



experiencing a significant housing crisis. I acknowledge the evidence that access to play space and more extensive physical living environments are contributors to a child's wellbeing and can aid in a child's developmental process. However, I consider access to a warm, safe, and stable accommodation are overriding factors to achieving the same essential outcomes. In my opinion, restricting whānau with children from occupying studio units, or limiting children of certain age groups from particular units, is likely to result in perverse outcomes, which ultimately would translate to whānau being unable to access CEH accommodation. In forming this conclusion, I note that the wellbeing of tamariki (through the process of undertaking an individual needs based assessment of each whānau) is at the forefront of any decision making around placement into suitable living environments.

- 5.26 The lack of on-site play space is additionally mitigated by off site activities provided by the service provider. This is in addition to the school drop off and collection service that runs during school terms.
- 5.27 Overall, it is my opinion that the site is adequately suited to accommodating children. I do not support conditions 8-10 recommended in the s42A report.

*Occupancy rate*

- 5.28 Ms Bennie recommends that the proposed maximum occupancy rate for the site be 42 occupants. The following is also recommended:
- (a) No children between the ages of eight and twelve shall be permitted to reside on site.
  - (b) Studio units may accommodate a maximum of two people (excluding children under the age of six months). No children between the ages of six months and eighteen years shall be permitted to reside in studio units.
  - (c) Two bedroom units may accommodate a maximum of four people (excluding children under the age of six months). This is conditional on secure fencing being installed for each courtyard adjacent the two0-bedroom unit.
  - (d) In the case that secure fencing is not installed for each courtyard, children between the ages of six months and seven years old shall not be permitted to reside on-site.

- 5.29 I support the proposed maximum occupancy rate of 42 occupants.
- 5.30 The proposed occupancy rate per unit attempts to mitigate concerns of overcrowding and is based on the Canadian National Occupancy Standard (CNOS) used by Statistics New Zealand.
- 5.31 My Primary Evidence discusses why, in my opinion, the CNOS is not appropriate as applied to CEH. In my opinion, the service provider is best placed to determine which rooms are most suitable for occupants, and they consider a multitude of factors including family dynamics.
- 5.32 As noted above, I do not agree that it is necessary to limit the individual occupancy levels of specific units, or apply restrictions to accommodate young children. In my opinion, while such restrictions are well-intended, I do not consider that these are necessary to achieve the worthy objective of avoiding overcrowding. The Service Providers are skilled at ensuring the wellbeing of whānau and tamariki are at the forefront of determining appropriate allocation of accommodation.

*CPTED principles*

- 5.33 The overview s42A report states that it would be helpful if the applicant can produce evidence that the application addresses the National Guidelines for Crime Prevention through Environmental Design (CPTED). In my Primary Evidence I explain why I do not consider this to be necessary and it has not been undertaken. However if the Panel consider this is necessary, this could be imposed as a condition of consent. An audit guided by CPTED principles could be undertaken and any recommendations from the audit can be implemented and incorporated into the Site Management Plan (SMP).

***Transportation Effects***

- 5.34 I agree with and accept the s42A analysis with regard to transportation effects and the inclusion of suitable conditions.

***Noise Effects***

I agree with and accept the s42A analysis with regard to noise effects.

***Effects on Infrastructure***

- 5.35 I agree with and accept the s42A analysis with regard to effects on infrastructure.

***Financial contributions***

- 5.36 I agree with and accept the s42A analysis with regard to financial contributions.

**6 Relevant Planning Framework**

- 6.1 The higher order planning framework is discussed in my Primary Evidence, below I will discuss the ODP in the context of 3 Meade Street where there are particular matters that are distinct from my assessment in my Primary Evidence.

*Operative District Plan (ODP) Zone and CEH*

- 6.2 The site is located entirely within the Commercial 4 zone (COMZ4 Zone). The Commercial 4 zone is described in the ODP as:

*“Tourism accommodation concentrated along city entranceways and arterial routes such as Fenton Street and Lake Road. Activities within the Commercial 4 zone consist of motels or large apartment style buildings commonly two storeys in height, with signage that maintains surrounding amenity. The buildings are designed to cover the majority of the land area and have minimal yards that are landscaped where they adjoin the road.”*

- 6.3 The Proposal aligns with this zone description. CEH is very similar to the operation of a motel or to medium density residential household units. There are no modifications proposed to the buildings or structures themselves, except removal of motel signage. Without motel signage, the existing buildings present as attached terrace style residential units. The site is fully fenced on all boundaries.
- 6.4 As discussed elsewhere, the Proposal includes the reversion back to traditional ‘tourist accommodation<sup>4</sup>’ in the future (which will likely include reinstatement of motel signage).

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<sup>4</sup> ODP definition of ‘Tourist accommodation’ (page 35 Part 1 of ODP).

- 6.5 I note that the ODP provides for ‘community housing<sup>5</sup>’ as a permitted activity in both the Commercial 4 and all residential zones of the ODP<sup>6</sup>. The only reference to emergency housing in the ODP is in the definition of ‘community housing’ and emergency housing is not otherwise mentioned anywhere in the ODP. I note the evidence of Mr Batchelar is that if the Proposal did not include wrap around support services, it could be considered as a conversion of motel units to residential units<sup>7</sup>.

*Commercial Zone Objectives and Policies*

- 6.6 **COMZ-01** aims to keep commercial centres compact and have commercial and tourism centres that effectively service and support the needs of the surrounding community. While the CEH activity does not provide a commercial service to the community, the Proposal provides an alternative form of service to the community – by providing temporary supported accommodation for members of the community during a period in which there is an acute need for housing. The tourism and housing context has clearly changed in the last 5-10 years and as a result “housing is one of the biggest issues facing the Rotorua community<sup>8</sup>”. Coupled with an acute housing need, Rotorua’s tourism sector is recovering from the impact of COVID-19.
- 6.7 Experts, including Ms Healy, advise that the mixing of tourism accommodation and emergency accommodation has the potential to adversely affect Rotorua’s reputation as a desirable place to visit. In my opinion, the exclusive contracting nature of the CEH model for emergency housing (rather than mixing tourist accommodation guests with emergency housing occupants) minimises situations where those utilising accommodation for living purposes erode a visitors experience of a tourist accommodation facility. In my opinion, CEH strikes an appropriate balance between providing for tourism needs and the needs of the surrounding community.

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<sup>5</sup> Community housing is defined as (page 8 ODP): “a place of residence for a maximum of eight persons (i.e. all residents including resident staff) where some element of care or support is provided for residents. The definition includes emergency housing (including temporary overnight accommodation) and rehabilitation centres, but excludes facilities where the movement of residents is legally restricted”.

<sup>6</sup> Community housing is permitted activity in the Commercial 4 zone, all residential zones, all Rural zones and the City Centre 1 zone (above the first floor).

<sup>7</sup> Noting that this is in the context of the District Plan definition of ‘household units’.

<sup>8</sup> See RLC Submission on the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill, page 2.

- 6.8 Furthermore, the motel operator advises that CEH has enabled the business to survive in the unique and challenge context of operating under the impact of COVID-19.
- 6.9 Relevant to this site is supporting Policy **COMZ-P4**, which provides direction to sites located in the Entranceway Accommodation and Tourism area. I note that the Proposal does not prevent the development of other tourism enterprises or Māori cultural experience in this area. It is my opinion that conditions can manage effects to ensure that the CEH activities do not adversely affect the amenity and vibrancy of these areas. In addition, the SMP is adaptive to situations and allows Service Providers to respond to any issues that could affect amenity or vibrancy accordingly.
- 6.10 In my opinion, while the Proposal cannot be said to clearly support the 'nationally significant tourism sector', it does nevertheless support the needs of the community by providing a supported living environment to vulnerable individuals and whānau. In my opinion, any conflict with **COMZ-O1** and **COMZ-P4** can be reconciled with the positive impacts the Proposal has in terms of meeting the needs of the surrounding community by providing a short-term housing solution to those without suitable alternative accommodation, in a manner whereby effects of the activity are largely contained.
- 6.11 **Objectives COMZ-O2** and **COMZ-O3** address design and appearance of buildings. Relevant supporting policies are **COMZ-P6** and **COMZ-P7**. I generally agree with the assessment undertaken by Ms Bennie in regard to these objectives and policies.
- 6.12 In particular, I agree with Ms Bennie that maintaining the existing landscaping and fencing together with the removal of motel signage and site upkeep will contribute to an attractive streetscape.

Objective **COMZ-O5** and supporting policy **COMZ-P10** address reverse sensitivity. I generally agree with the assessment undertaken by Ms Bennie in regard to this objective and policy.

*District Wide Objectives and Policies*

- 6.13 Ms Bennie addresses the following objectives and policies in her site specific s42A report:

- (a) Noise: NOISE-O1, NOISE-P4 and NOISE-P9
- (b) Infrastructure: EIT-O3 and EIT-P14
- (c) Transport: EIT-O7, EIT-P18 and EIT-P22

6.14 I agree with the assessment undertaken by Ms Bennie in regard to the district wide matters and have not identified any areas of conflict.

*Objectives and policies conclusion*

6.15 Overall, I consider the Proposal is consistent with the objectives and policies of the District Plan.

## **7 Response to s42A Report's Recommended Conditions of Consent**

7.1 Appendix 1 of the site specific s42A Report for 3 Meade Street contains draft conditions of consent recommended by Ms Bennie. There is broad agreement around the majority of proposed conditions. The discussion below focuses more specifically upon conditions where I suggest changes or explicitly disagree with those recommended in the s42A report. The Strategic Conditions in the overview s42A report have been discussed in my Primary Evidence.

7.2 An updated set of proposed consent conditions will be provided at the commencement of the hearing, and it is anticipated that these will develop over the course of the hearing. In the meantime, I provide the following overall comments on the recommended consent conditions attached to the Council's s42A site specific report.

7.3 **Conditions 2 and 3** identify the consent holder as the Operator and MHUD and restrict the consent from being transferred to and held by any other person. I do not agree with this restriction and have addressed this in my Primary Evidence.

7.4 **Condition 7** restricts site occupancy to a maximum of 42 persons (excluding children under six months of age). I support this condition.

7.5 **Conditions 8 to 11** limit the placement of children (in the case of Condition 8, restrict the accommodation of children aged between eight and twelve entirely) and specify maximum occupancy levels (excluding children under six months of age). I do not support the placement of these conditions and recommend their deletion. I accept that a revised condition (10) is

appropriate requiring fencing of the courtyards outside the 2 bedroom units, noting such improvement to the open space will improve the living environment for whānau with young children.

- 7.6 **Condition 12** provides clarification that the occupancy levels do not limit the length of stay for residents accommodated in the units, and also does not limit the number of people residing in Manager's Accommodation. I recommend that this is instead reframed as an Advice Note under the condition controlling the maximum site occupancy (condition 7). Further to this, if the panel is of the mind to grant consent and impose the maximum number of occupants as stated in the s42A report, it is requested that the options presented in paragraph 98 of the s42A report also be imposed. This will ensure that those currently occupying the site are able to retain their place of accommodation until a suitable long-term option is found.
- 7.7 **Conditions 15 to 18 and 23** relate to retention/enhancement of landscaping, maintenance of fencing, and improvements to open space areas throughout the site. I agree with the placement of these conditions.
- 7.8 **Condition 19** requires that physical motel signage be removed for the duration of the consent. I agree that this is reasonable.
- 7.9 **Condition 20** requires that all online advertising and websites that promote tourist accommodation and other services be removed. The implementation of this condition is difficult due to the nature of online advertising. Notwithstanding this, it is reasonable to require the Motel Operator to amend their website and booking websites to show no room availability and on this basis I agree that a condition to this effect is reasonable.
- 7.10 **Conditions 26 to 28 and 30** require compliance with the permitted activity performance standards for noise and light emissions from the site. I do not consider placement of conditions that simply replicate permitted activity standards, to be in accordance with good practice, and nor do I consider their placement necessary. I recommend deletion of these conditions.
- 7.11 **Condition 29** requires that the site shall be capable of meeting an internal road-traffic design sound level of 40dB LAeq inside all habitable rooms. It appears this requirement is from the performance standards as they relate to reverse sensitivity effects from being adjacent to a State Highway. The subject site is not located adjacent to a State Highway. This condition is

considered unnecessary and should be deleted. Reverse sensitivity was not raised as an issue in the s42A report by Ms Bennie.

7.12 **Conditions 33 to 37** relate to the taking of a bond. This matter has been discussed within my Primary Evidence, where I dispute the need for a bond, and also the value of the individual bond. I recommend deletion of these conditions.

## **8 Section 104D Gateway Test and Part 2 Analysis**

8.1 As discussed in my Primary Evidence, it is my opinion that the effects of the Proposal are no more than minor and the Proposal is not contrary to the objectives and policies of the Rotorua District Plan or Plan Change 9.

8.2 As detailed in my Primary Evidence, the Proposal aligns with Part 2 of the Act.

**Date:** 5 October 2022



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Alice Blackwell