

FORM 13

**SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED
APPLICATION CONCERNING RESOURCE CONSENT**

*Section 19 Resource Management Act 1991
Rotorua District Council*

To:
The Chief Executive
Rotorua District Council
Private Bag RO3029
ROTORUA

Name of Submitter:

Ankur verma

(Full Name)

This is a submission on an application from:

Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development (MHUD)

for a Resource Consent to:

use the site and existing buildings for contracted emergency housing for five years

at:

Lake Rotorua Motel – 131 Lake Road, Rotorua;
Alpin Motel – 16 Sala Street, Rotorua;
New Castle Motor Lodge – 18 Ward Ave, Rotorua;
Malones Spa Motel – 321 Fenton Street, Rotorua;
Pohutu Lodge – 3 Meade Street, Rotorua;
Union Victoria Motel – 26-28 Victoria Street & 5 Union Street, Rotorua;
Ascot On Fenton – 247 Fenton Street And 12 Toko Street, Rotorua;
Roto Vegas Motel – 249 Fenton St And 16 Toko Street, Rotorua;
Midway Motel - 293 Fenton Street, Rotorua;
Geneva Motor Lodge – 299 Fenton Street, Rotorua;
Ann's Volcanic - 107 Malfroy Road, Rotorua; and
Apollo Motel – 7 Tryon Street, Rotorua.

I am not a trade competitor of the Ministry of Housing and Urban Development as per s 308B or the RMA 1991.

The specific parts of the application that my submission relates to are:

The whole of each of the above applications in their entirety.

Doc No: IT-2044 (1 June 2005)

File Nos: RC17647, RC17648, RC17650, RC17662, RC17661, RC17673, RC17887, RC17889, RC17890, RC17891, RC17892, RC17893.

My submission is:

I oppose all of the above applications for the following reasons:

I seek the following decision from the consent authority:

TWe don't want home less as it's not marking community very safe .

- I wish to be heard in support of my submission
- I do not wish to be heard in support of my submission

I affirm that this is the submission of:

Date:

Address for service of Submitter:

Telephone:

Email:

Doc No: IT-2044 (1 June 2005)

File Nos: RC17647, RC17648, RC17650, RC17662,
RC17661, RC17673, RC17887, RC17889,
RC17890, RC17891, RC17892, RC17893.

Note to Submitter:

Further information about the above applications may be viewed at:

<https://www.rotorualakescouncil.nz/our-council/consultation-and-public-notice/public-notice-for-contracted-emergency-housing>

If you have any questions about the application you may contact Bethany Bennie (Consultant Planner) at Boffa Miskell on (07) 927 5748 or by email at bethany.bennie@boffamiskell.co.nz

Once you have completed filling in the above form electronically, save it and attach it to an email and send it to:

The Rotorua District Council:
planning.submissions@rotorualc.nz

and:

MHUD:
ablackwell@propertygroup.co.nz

and:

Restore Rotorua Inc:
restorerotorua@gmail.com

Please see attached form 13.
Submission for Resource
Consent opposing.

MHUD application
for 12 motel sites.

Please acknowledge by
return email confirmation
of receipt asap.

FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991
(Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: <u>Shelley Darleen McHale</u> _____ _____ (Full Name)
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This is a submission on an application from:

Ministry of Housing and Urban Development
(Name of applicant)

for a Resource Consent to: use the sites and existing buildings for contracted emergency housing for five years

at: _____
[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

please see attached pages opposing resource consent for 12 motels to be used for emergency housing.

[Give Details]

My submission is:

To decline and oppose this application for resource consent. My views and reasons are outlined on the attached page.

[include -

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views]

I seek the following decision from the consent authority:

To decline resource consent to MHUD to use 12 Rotorua motels as EH for five years

[Give precise details, including the general nature of any conditions sought]

I wish / do not wish to be heard in support of my submission.

* If others make a similar submission, I will consider presenting a joint case with them at a hearing.

* [Delete if you would not consider presenting a joint case]

Signature of submitter (or person authorised to sign on behalf of submitter): <u>Shelley McHale</u>	Date: <u>10/7/22</u>
Address for service of Submitter: [Redacted]	Telephone: [Redacted]
Contact person: [name and designation, if applicable] _____	Fax/email: [Redacted]

Page 1 Attachment for Submission for Shelley Darleen McHale

I AM OPPOSED TO ALL SITES NOTED BELOW BEEN GIVEN RESOURCE CONSENT TO OPERATE AS EMERGENCY HOUSING FOR 5 YEARS OR ANY CONTRACTED TERM. I ALSO WISH TO BE HEARD AS A GROUP IN SUPPORT OF MY SUBMISSION.

RC17647 – LAKE ROAD MOTEL – 131 LAKE ROAD, ROTORUA

RC17648 – ALPIN MOTEL – 16 SALA ST, ROTORUA

RC 17650 – NEW CASTLE MOTOR LODGE – 18 WARD AVE, ROTORUA

RC17662 – MALONES SPA MOTEL – 321 FENTON ST, ROTORUA

RC17661 – POHUTU LODGE – 3 MEADE ST, ROTORUA

RC17673 – UNION VICTORIA MOTEL – 26-28 VICTORIA ST & 5 UNION ST ROTORUA

RC17887 – ASCOT ON FENTON – 247 FENTON ST & 12 TOKO ST, ROTORUA

RC17889 – ROTO VEGAS MOTEL – 249 FENTON ST 7 16 TOKO ST, ROTORUA

RC17890 – MIDWAY MOTEL – 293 FENTON ST, ROTORUA

RC17891 – GENEVA MOTOR LODGE – 299 FENTON ST, ROTORUA

RC17892 – ANN’S VOLCANIC – 107 MALFROY RD, ROTORUA

RC17893 – APOLLO MOTEL – 7 TRYON ST, ROTORUA

I have been living in this town for over 60 years and after witnessing numerous confrontations by disorderly and uncontrolled groups of people roaming our city, I no longer feel safe in my vehicle and drive with my doors locked. I no longer want to shop at our local Mall after walking to my car and being abused by a group of very drunk people sitting outside the Mall drinking. This town has been destroyed by the increase in disgraceful behavior of people staying in these Motels. Lastly, I was so embarrassed when friends booked into a Motel without being told it was being used for Emergency Accommodation and had that was the worst overnight stay they had ever experienced in their lives. After asking for their money back due to all night noise, offensive language and a dog barking in the room, they left the next day. When will this stop so our town can recover from this chaos?

These are my reasons for making this submission. We no longer want our town subjected to any form of Emergency Housing for any reason. These needs to be sited else where and not in the middle of our town where tourist are subjected to unsafe practices by people who cannot control themselves.

Please see attached form 13.
Submission for Resource
Consent opposing.

MHUD application
for 12 motel sites.

Please acknowledge by
return email confirmation
of receipt asap.

FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991
(Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag R03029 ROTORUA	Name of Submitter: <u>Roger John McHale</u> _____ _____ (Full Name)
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This is a submission on an application from:
Ministry of Housing and Urban Development
(Name of applicant)

for a Resource Consent to: use the sites and existing buildings for contracted emergency housing for five years
at: _____
[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:
Please see attached pages opposing resource consent for 12 motels to be used for emergency housing
[Give Details]

My submission is: to decline and oppose this application for resource consent. My views and reasons are outlined on the attached page

- [include -
- whether you support or oppose the specific parts of the application or wish to have them amended; and
 - the reasons for your views]

I seek the following decision from the consent authority:
To decline resource consent to MHUD to use 12 Rotorua motels as EH for five years
[Give precise details, including the general nature of any conditions sought]

I wish / do not wish to be heard in support of my submission.
* If others make a similar submission, I will consider presenting a joint case with them at a hearing.
* [Delete if you would not consider presenting a joint case]

Signature of submitter (or person authorised to sign on behalf of submitter): <u>[Signature]</u>	Date: <u>10/7/22</u>
Address for service of Submitter: _____ _____	Telephone: _____
Contact person: [name and designation, if applicable] _____	Fax/email: _____

Page 1 Attachment for Submission for Roger McHale

I AM OPPOSED TO ALL SITES NOTED BELOW BEEN GIVEN RESOURCE CONSENT TO OPERATE AS EMERGENCY HOUSING FOR 5 YEARS OR ANY CONTRACTED TERM. I ALSO WISH TO BE HEARD AS A GROUP IN SUPPORT OF MY SUBMISSION.

RC17647 – LAKE ROAD MOTEL – 131 LAKE ROAD, ROTORUA

RC17648 – ALPIN MOTEL – 16 SALA ST, ROTORUA

RC 17650 – NEW CASTLE MOTOR LODGE – 18 WARD AVE, ROTORUA

RC17662 – MALONES SPA MOTEL – 321 FENTON ST, ROTORUA

RC17661 – POHUTU LODGE – 3 MEADE ST, ROTORUA

RC17673 – UNION VICTORIA MOTEL – 26-28 VICTORIA ST & 5 UNION ST ROTORUA

RC17887 – ASCOT ON FENTON – 247 FENTON ST & 12 TOKO ST, ROTORUA

RC17889 – ROTO VEGAS MOTEL – 249 FENTON ST 7 16 TOKO ST, ROTORUA

RC17890 – MIDWAY MOTEL – 293 FENTON ST, ROTORUA

RC17891 – GENEVA MOTOR LODGE – 299 FENTON ST, ROTORUA

RC17892 – ANN'S VOLCANIC – 107 MALFROY RD, ROTORUA

RC17893 – APOLLO MOTEL – 7 TRYON ST, ROTORUA

My reasons for making this submission are in part due to the sad deterioration of our city centre, and the reputation of our tourist industry being affected by the increase in disorderly, and violent behavior from brawls and gang fights we are constantly subjected to as locals. We use to enjoy a leisurely friendly meal on a regular basis in the local Eat Streat area, but now we find ourselves subjected to an increase in begging, and abuse if we do not co-operate. My wife and I no longer go in to town like we use to, as we no longer feel safe, and the atmosphere we use to enjoy has been marred by this behavior.

I also make this submission in support of my elderly mother who sadly has since passed and had to endure the change of environment in the Glenholme area after living there for over 30years. My mother and her aging neighbors in her last 2yrs became fearful for their safety as an increase in home invasion and theft converted their once safe and friendly community. While staying to nurse Mum, I was overwhelmed by the constant presence of Police sirens in an area that would never normally see or hear a Police vehicle for any reason. This left me with huge concerns for the Glenholme/Fenton St area, our city and more importantly residents and ratepayers of this town safety.

Please accept this as my reasons for opposing the resource consent of 12 motel sites for emergency housing.



FORM 13



SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

Section 96 Resource Management Act 1991

(Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: Rotorua Housing Taskforce (est. March 2021) (excluding those listed in Appendix A).
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This is a submission on 12 separate applications from:

Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development (HUD)

for a Resource Consent to:

Use various existing sites and buildings on the sites for contracted emergency housing at each of the following addresses and as generally described in each individual application referred to in the list below:

- RC17647 at 131 Lake Road, Rotorua
- RC17648 at 16 Sala Street
- RC17650 at 18 Ward Ave
- RC17662 at 321 Fenton Street
- RC17661 at 3 Meade Street
- RC17673 at 26-28 Victoria Street and 5 Union Street
- RC17887 at 247 Fenton Street and 17 Toko Street
- RC17889 at 249 Fenton St and 16 Toko Street
- RC17890 at 293 Fenton Street Rotorua
- RC17891 at 299 Fenton Street
- RC17892 at 107 Malfroy Street
- RC17893 at 7 Tyron Street

Each site is subject to a separate application (refer to the RC numbers listed above). This submission is in respect of each of these separate applications.

The specific parts of the application that my submission relates to are:

All parts of each of the 12 individual applications referred to above.

My submission is:

The submitter is in support all parts of each application and recommends resource consents be granted.

The proposals will on balance have beneficial effects both with regard to the wider social and cultural, environmental and economic contexts, and with regard to the purposes and principles of the Resource Management Act.

The background of national policy and government direction support the purpose of these applications.

Refer to the further matters provided in Appendix A and B.

I seek the following decision from the consent authority:

Grant resource consent to each application as described in the applications and in accordance with conditions of consent recommended in each application.


[Give precise details, including the general nature of any conditions sought]

I wish ~~do not wish~~ to be heard in support of my submission and in regard to each application.

* If others make a similar submission, I will consider presenting a joint case with them at a hearing.

Note to submitter:

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have

Signature of submitter (or person authorised to sign on behalf of submitter):  Signed on behalf of submitter by Mark Batchelor – CKL NZ Ltd	Date: 11.07.2022
Address for service of Submitter: [REDACTED] [REDACTED]	Telephone: [REDACTED]
Contact person: Mark Batchelor	email: [REDACTED]

served your submission on the consent authority.

The information you have provided on this form is required so that your submission can be processed under the RMA, and your name and address will be publicly available. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission. If you would like to request access to, or correction of your details, please contact the Council.

APPENDICES TO SUBMISSION

The following appendices form part of this submission.

APPENDIX A

Rotorua Housing Taskforce

The Rotorua Housing Taskforce was established in March 2021 and includes government agencies, Iwi and Rotorua Lakes Council to provide better support and outcomes for people living in emergency housing or at risk of homelessness. The aim of the Taskforce is to develop immediate short-term solutions to improve the environment for whānau in emergency housing and the wider community, while more permanent housing solutions, which require time to develop, are delivered.

The Taskforce comprises:

- Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development
- Kāinga Ora
- Te Arawa
- Ngāti Whakaue
- Rotorua Lakes Council
- Ministry of Social Development
- Te Puni Kōkiri
- NZ Police
- Health New Zealand
- Department of Corrections
- Pukeora Oruawhata Trust

For the purposes of this submission it is made on behalf of the organisations listed above with the exceptions of:

- Rotorua Lakes Council
- Te Puni Kōkiri
- Ngāti Whakaue

APPENDIX B

Specific Matters of Submission by Submitters

The following matters and others relate directly and indirectly to consideration of the 12 resource consent applications. These are not exclusive of the other resource management matters referred to in the submission.

1. Emergency housing is a temporary measure while work is undertaken to ease the housing crisis in Rotorua through long-term solutions. It assists people and families for a short period, whilst other arrangements can be made, to provide them with more sustainable accommodation.
2. The programme of transition the emergency housing is part of is that emergency housing is an initial step to providing a route towards the ultimate objective of home ownership, through the stages, as

may be required in each individual circumstance, transitional housing, public housing, sub-market rentals, market rentals, progressive home ownership, to full home ownership.

3. Strong population growth in Rotorua has increased the need to provide emergency housing as a result of the significant pressure on the housing market relating to supply and cost. This has been exacerbated by the short period over which these conditions have occurred in Rotorua as they have throughout New Zealand.
4. The Rotorua Housing Taskforce was established in March 2021. It involves government agencies, iwi and Council, working in partnership with other community stakeholders to provide better support and outcomes for people requiring emergency housing, or at risk of becoming homeless. Te Tūāpapa Kura Kāinga contracted around 300 motel units within 13 motels in Rotorua. While occupancy numbers vary day-to-day, roughly 180-190 units are usually occupied by vulnerable whānau with tamariki.
5. The motels provide dedicated safe and secure accommodation for whānau with tamariki and vulnerable adults.
6. Importantly, wrap-around services address the needs of the people accommodated towards establishing stability and security for them and the wider community.
7. The existing motel facilities being utilised for emergency housing in Rotorua are well suited to provide for emergency housing. The use of existing motel facilities for emergency housing is an efficient use of existing sites and facilities and retains the existing qualities of the surrounding environment. The sites are well located in terms of proximity to wider amenities such as public open space, public transport, and neighbourhood service amenities.
8. The tourist accommodation resource is not lost or damaged and the use proposed in the applications is not compulsory or irreversible. The tourism market can be responded to by individual site owners and managers as they determine it being viable. This provides an economic resilience and sustainability to the uncertain social, economic and cultural times our communities are presently weathering. This provides a means of sustaining the investment in the tourist accommodation market until it is determined by owners and operators to be viably re-established.
9. The proposals directly contribute to achieving the outcomes sought by the National Policy Statement on Urban Development by enabling the those with urgent housing needs to have safe and stable accommodation while more permanent housing solutions are found.
10. The character of development is no different to those that exist as tourist accommodation.
11. The character of activity is essentially similar to tourist accommodation, being accommodation of people with varying periods of occupation and numbers of people accommodated within units on the site.

FORM 13

**SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED
APPLICATION CONCERNING RESOURCE CONSENT**

Section 96 Resource Management Act 1991

(Rotorua Lakes Council is the operating name of Rotorua District Council)

**ROTORUA
LAKES COUNCIL**

To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: Rotorua Housing Taskforce (est. March 2021) (excluding those listed in Appendix A)
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This is a submission on an application from:

Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development

for a Resource Consent to: use a site and existing buildings within the site for Contracted Emergency Housing with a term of five years.

at: 284-286 Fenton St, Rotorua (Emerald Spa Motor Inn)

The specific parts of the application that my submission relates to are:

All parts of the individual application referred to above.

My submission is:

The submitter is in support of all parts of the application and recommends resource consent be granted.

The proposal will on balance have beneficial effects both regard to the wider social and cultural, environmental and economic contexts, and with regard to the purposes and principles of the Resource Management Act.

The background of national policy and government direction support the purpose of this application.


Refer to the further matters provided in Appendix A and B.

I seek the following decision from the consent authority:

Grant resource consent to the application as described in the application and in accordance with conditions of consent recommended in the application.

I wish wish to be heard in support of my submission.

* If others make a similar submission, I will consider presenting a joint case with them at a hearing.

<p>Signature of submitter (or person authorised to sign on behalf of submitter):</p>  <p>Signed on behalf of submitter by Bevan Houlbrooke – CKL NZ Ltd</p>	<p>Date: 01.09.2022</p>
<p>Address for service of Submitter:</p> <p>CKL NZ Ltd</p> <p>[REDACTED]</p>	<p>Telephone:</p> <p>[REDACTED]</p>
<p>Contact person:</p> <p>Bevan Houlbrooke</p>	<p>email:</p> <p>[REDACTED]</p>

Note to submitter:

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

The information you have provided on this form is required so that your submission can be processed under the RMA, and your name and address will be publicly available. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission. If you would like to request access to, or correction of your details, please contact the Council.

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The Rotorua Housing Taskforce was established in March 2021 and includes government agencies, Iwi and Rotorua Lakes Council to provide better support and outcomes for people living in emergency housing or at risk of homelessness. The aim of the Taskforce is to develop immediate short-term solutions to improve the environment for Whanau in emergency housing in the wider community, while more permanent housing solutions, which require time to develop, are delivered.

The Taskforce comprises:

- Te Tuapapa Kura Kainga – Ministry of Housing and Urban Development
- Kainga Ora
- Te Arawa
- Ngati Whakaue
- Rotorua Lakes Council
- Ministry of Social Development
- Te Puni Kokiri
- New Zealand Police
- Health New Zealand
- Department of Corrections
- Pukeora Oruawhata Trust

For the purposes of this submission, it is made on behalf of the organisations listed above with the exceptions of:

- Rotorua Lakes Council
- Te Puni Kokiri
- Ngati Whakaue
- New Zealand Police

APPENDIX B

Specific Matters of Submission by Submitters

The following matters and others relate directly and indirectly to consideration of the resource consent application. These are not exclusive of the other resource management matters referred to in the submission.

1. Emergency housing is a temporary measure while work is undertaken to ease the housing crisis in Rotorua through long-term solutions. It assists people and families for the short period, whilst other arrangements can be made, to provide them with more sustainable accommodation.

2. The programme of transition the emergency housing is part of is that emergency housing is an initial step to providing a route towards the ultimate objective of home ownership, through the stages, as may be required in each individual circumstance, transitional housing, public housing, sub-market rentals, market rentals, progressive home ownership, to full home ownership.
3. Strong population growth in Rotorua has increased the need to provide emergency housing as a result of the significant pressure on the housing market relating to supply and cost. This has been exacerbated by the short period over which these conditions have occurred in Rotorua as they have throughout New Zealand.
4. The Rotorua Housing Taskforce was established in March 2021. It involves government agencies, Iwi and Council, working in partnership with other community stakeholders to provide better support and outcomes for people requiring emergency housing, or at risk of becoming homeless. Te Tuapapa Kura Kainga contracted around 300 motel units within 13 motels in Rotorua. While occupancy numbers vary day-to-day, roughly 180-190 units are usually occupied by vulnerable whanau with tamariki.
5. The motels provide dedicated safe and secure accommodation for whanau with tamariki and vulnerable adults.
6. Importantly wrap around services address the needs of the people accommodated towards establishing stability and security for them and the wider community.
7. The existing motel facilities being utilised for emergency housing in Rotorua are well suited to provide the emergency housing. The use of existing motel facilities for emergency housing is an efficient use of existing sites and facilities and retains the existing qualities of the surrounding environment. The sites are well located in terms of proximity to wider amenities such as public open space, public transport, and neighbourhood service amenities.
8. The tourist accommodation resource is not lost or damaged and the use proposed in the applications is not compulsory or irreversible. The tourism market can be responded to by individual site owners and managers as they determine it being viable. This provides an economic resilience and sustainability to the uncertain social, economic and cultural times our communities are presently weathering. This provides a means of sustaining the investment in the tourist accommodation market until it is determined by owners and operators to be viably re-established.
9. The proposals directly contribute to achieving the outcomes sought by the National Policy Statement on Urban Development by enabling the those with urgent housing needs to have safe and stable accommodation while more permanent housing solutions are found.
10. The character of development is no different to those that exist as tourist accommodation.
11. The character of activity is essentially similar to tourist accommodation, being accommodation of people with varying periods of occupation and numbers of people accommodated within units on the site.

11 July 2022

Rotorua Lakes Council
Private Bag 3029
Rotorua Mail Centre
ROTORUA 3046

BY EMAIL
planning.submissions@rotorualc.nz

Tēnā koutou

Submission on a Resource Consent Application for 131 Lake Road by the Ministry of Housing and Urban Development (MHUD) to Rotorua District Council

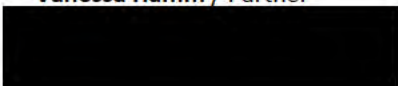
1. This is a submission on behalf of Mountain Surf Trust (**MST**) on an application for a resource consent to use the existing site and motel buildings for contracted emergency housing at Lake Rotorua Motel, 131 Lake Road, reference number RC17647 (**the Application**). MST owns a property [REDACTED], in close proximity to 131 Lake Road and makes a submission in relation to this development.
2. MST is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.
3. MST's submission relates to all parts of the Application.
4. MST opposes the Application. The reasons for MST's opposition are that:
 - (a) The effects of the Application on safety associated with anti social behaviour in the Lake Road area are substantial and of concern, particularly in relation to MST's tenants at [REDACTED];
 - (b) The increased traffic effects associated with the Application are adverse, particularly as there are no pedestrian crossings in the area;
 - (c) The significant adverse effects associated with the Application cannot be avoided, remedied or mitigated and therefore the Application should not be granted;
 - (d) The significant adverse effects associated with the Application are long term, particularly when considered in conjunction with the other existing emergency housing sites in Rotorua and the applications being considered at the same time as the Application;
 - (e) The economic effects of the Application are significant, including the loss of revenue with the use of the motel for emergency housing, the loss of revenue from tourists, and also the associated lost tourism revenue and concerns in central Rotorua;
 - (f) The Applications are inconsistent with the policy framework of the Rotorua District Plan;

- (g) The Applications, which are for non-complying activities, will not comply with s 104D(1)(a) or (b) of the RMA;
 - (h) The Applications are inconsistent with the policy framework in the Bay of Plenty Regional Policy Statement;
 - (i) The Applications are inconsistent with the objectives and policies of the National Policy Statement for Urban Development 2020;
 - (j) The Application does not give effect to Part 2 of the RMA.
5. MST seeks that the Applications be declined. MST wishes to be heard in support of its submissions.
6. MST requests, pursuant to section 100A of the Act, that the Council delegates its functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Ngā mihi
HOLLAND BECKETT LAW



Vanessa Hamm / Partner

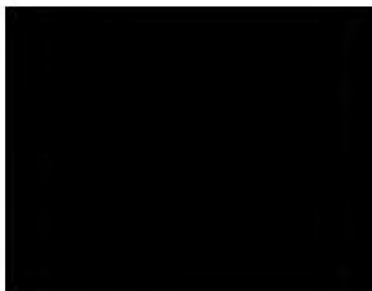


CC: Ministry of Housing and Urban
Development
c/o The Property Group Limited
Wellington Office
PO Box 2874
WELLINGTON 6140

Attention: Alice Blackwell
ablackwell@propertygroup.co.nz

Electronic address for Restore Rotorua:
Telephone:
Postal address:

Contact person:



11 July 2022

Rotorua Lakes Council
Private Bag 3029
Rotorua Mail Centre
ROTORUA 3046

BY EMAIL
planning.submissions@rotorualc.nz

Tēnā koutou

Restore Rotorua Incorporated Submissions on 12 Applications by Ministry of Housing and Urban Development (MHUD) to Rotorua District Council

1. We act for Restore Rotorua Incorporated (**RRI**). These are the submissions of RRI on 12 land use resource consent applications from **MHUD**.
2. The applications relate to the following addresses:
 - (a) RC17647 - Lake Rotorua Motel - 131 Lake Road, Rotorua;
 - (b) RC17648 - Alpin Motel - 16 Sala Street, Rotorua;
 - (c) RC 17650 – New Castle Motor Lodge - 18 Ward Street, Rotorua;
 - (d) RC17662 – Malones Spa Motel – 321 Fenton Street, Rotorua;
 - (e) RC17661 – Pohutu Lodge – 3 Meade Street, Rotorua;
 - (f) RC17673 – Union Victoria Motel – 26/28 Victoria Street, Rotorua;
 - (g) RC17887 – Ascot on Fenton - 247 Fenton Street & 12 Toko Street, Rotorua;
 - (h) RC17889 – Roto Vegas Motel – 249-251 Fenton Street & 14-16 Toko Street, Rotorua;
 - (i) RC17890 – Midway Motel – 293 Fenton Street, Rotorua;
 - (j) RC17891 – Geneva Motor Lodge – 299 Fenton Street, Rotorua;
 - (k) RC17892 – Ann’s Volcanic – 107 Malfroy Road, Rotorua; and
 - (l) RC17893 – Apollo Motel – 7 Tryon Street, Rotorua (**the Applications**).
3. The Applications all relate to a request to use the sites and buildings within those sites for Contracted Emergency Housing with a term of five years. The proposed activities at the above named sites are for various occupation levels and unit numbers.
4. RRI is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.
5. RRI’s submissions relate to all parts of the Applications. Where RRI’s submissions relate to a particular property, RRI has made that clear.
6. RRI opposes the Applications. The reasons for RRI’s views are:
 - (a) The adverse effects of existing emergency housing have been significant, and the cumulative social, economic and environmental effects of the Applications are significant and unacceptable;
 - (b) The significant adverse effects associated with the Applications cannot be avoided, remedied or mitigated and therefore the Applications should not be granted;

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- 8. RRI is aware that the Rotorua Lakes Council has delegated its functions, powers and duties to an Independent Hearing Panel to hear and decide this application. For the avoidance of doubt, RRI requests, pursuant to section 100A of the Act, that the Council delegates its functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Ngā mihi

HOLLAND BECKETT LAW

Vanessa Hamm / Partner



CC: Ministry of Housing and Urban
 Development
 c/o The Property Group Limited
 Wellington Office
 PO Box 2874
 WELLINGTON 6140

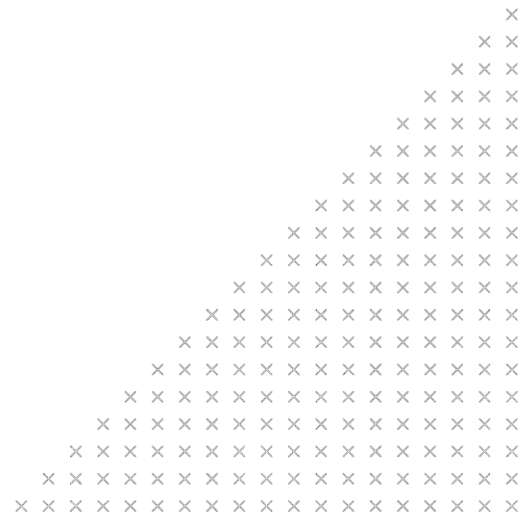
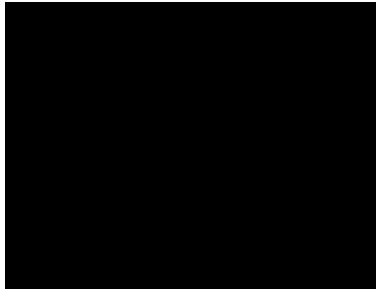
Attention: Alice Blackwell
 ablackwell@propertygroup.co.nz

Electronic address for Restore Rotorua:

Telephone:

Postal address:

Contact person:



**REVISED SUBMISSION TO ROTORUA LAKES COUNCIL AND THE PROPERTY GROUP LIMITED
RE MHUD'S APPLICATION FOR 13 RESOURCE CONSENTS FOR CONTRACTED EMERGENCY
HOUSING WITH A TERM OF FIVE YEARS**

by ROTORUA DISTRICT RESIDENTS AND RATEPAYERS

Wednesday 17 August 2022

EXECUTIVE SUMMARY

RDRR'S revised submission opposes all 13 resource consent applications for the following reasons:

1. The notification and consultation process exhibited predetermination, bias and improper purposes, with irrelevant considerations being taken into account.
2. The criteria regarding zoning were not clarified and should have been to ensure relevant feedback.
3. The applicable criteria from the RMA were not clarified and should have been to elicit relevant feedback.
4. A website that was the major point of contact for citizens was non-operational and may have deterred concerned citizens from gaining access to the information that they are entitled to under LGOIMA.
5. There are no assurances or incentives for the three service providers to find more permanent housing options.
6. The needs assessments of the homeless methodology needs to be clarified in professional terms.
7. The so-called 'wrap-around support services' need to be clarified, and professionally standardized and justified to ensure effective delivery.
8. The variances in 'wrap-around support services' indicate that the three support providers are working to different well-being models which need to be resolved before resource consent is given.
9. It is not clear who will be managing the homeless system in Rotorua and providing public accountability.
10. The unacceptable environmental effects of the proposed resource consents include
 - a. Reducing the real estate values of homes in the vicinity of all 13 motels.
 - b. Undermining the recovery of tourism and fundamentally altering the character of Rotorua without the informed consent of citizens, both considered improper purposes.
 - c. A waste of public resources in a context of inflation and rates rises.

- d. The MHUD applications are part of a wider muddled strategy that is increasingly being contested because of the perverse outcomes it has created.
 - e. No guarantee that Rotorua people will be first in line for homes built in Rotorua, which many regard as an improper purpose.
 - f. The scale of proposed throughput of homeless people into social housing is not feasible, has not been formally endorsed as Council policy, which again reflects improper purposes.
11. The RDRR endorses the concerns of Restore Rotorua Inc (RRI), specifically that
- a. Adverse effects of existing emergency housing in central Rotorua have been significant, and the potential cumulative social, economic and environmental effects of the Applications are significant and unacceptable.
 - b. The significant adverse effects associated with the Applications cannot be avoided, remedied or mitigated and therefore the Applications should not be granted.
 - c. The significant adverse effects associated with the Applications are long term, particularly when considered in conjunction with the time for which the sites have already been operating and with the other emergency housing sites in Rotorua.
 - d. The Applications, if granted in total or in part, raise safety issues in central Rotorua, which is already a significant concern for CBD users.
 - e. The economic effects of the Applications, both in terms of lost tourism revenue with the use of hotels and motels for emergency housing, and the associated lost tourism revenue associated with safety concerns in the CBD.
 - f. The Applications are inconsistent with the policy framework in the Rotorua District Plan.
 - g. The Applications, which are for non-complying activities, will not comply with s 104D(1)(a) or (b) of the RMA.
 - h. The Applications are inconsistent with the policy framework in the Bay of Plenty Regional Policy Statement.
 - i. The Applications are inconsistent with the objectives and policies of the National Policy Statement for Urban Development 2020.
 - j. The Applications do not give effect to Part 2 of the RMA.
12. RDRR requests that the Applications be declined, or at least limited to one year, and to be heard in support of its submission.
13. RDRR support the Council delegating its functions, powers, and duties to hear and decide the application to hearings commissioners who are not members of the local authority.
14. RDRR requests that pragmatic alternatives to the Applications be considered:

- a. Have MSD limit the inflow to proven locals, deduct the number of people leaving from population estimates and refuse the MHUD applications because the combined throughput cannot be plausibly housed.
- b. A fundamental flaw in Council's housing policy is that it has persisted in using high growth assumptions, despite evidence mounting that low growth assumptions are warranted.
- c. Since support for the MHUD's applications may have collapsed in Council and in central government, RDRR asks that Commissioners to regard the 13 Applications as null and void.

BACKGROUND

This submission to the Rotorua Lakes Council (Council) is on behalf of the 1,136 current members, associates and friends of the Rotorua District Residents and Ratepayers (RDRR).

Twelve Applications by Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development (MHUD) were publicly notified 11 June 2022 in the Rotorua Daily Post. They are summarized in Appendix 1.

The thirteenth Application was accepted by the Chairman of the Independent Hearing Panel on 5 August 2022 with identical conditions (also see Appendix 1).

The complexity of the submission process and requirements was protested immediately by many parties as unreasonable. The process and requirements were then changed, poorly advertised, and caused even more confusion.

One result was the RDRR's normal gathering of feedback was delayed, then disrupted, and initially only permitted one relatively brief round of consultation. Another result of the late receipt of the 13th Application is widespread skepticism, rendering another round of consultations of RDRR members pointless.

Please note that a link to the replies from MHUD to the Council's request for more information, and the Beca Social Impact Assessment attached to each property, was not made available to the RDRR until 6 July, initially too late to be given a detailed evaluation.

There is, therefore, considerable concern in the RDRR that the decision-making process has evidenced predetermination, bias and improper purposes, and that irrelevant considerations have been taken into account.

MAKING THIS SUBMISSION

The RDRR is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

RDRR's revised submission relates to all parts of the 13 Applications. Given the changed, confused and confusing requirements regarding making a submission, RDRR decided to email it, with a completed Form 13, simultaneously to

- Bethany Bennie, Boffa Miskell at bethany.bennie@boffamiskell.co.nz
- Council's Planning Department at planning.submissions@rotorualc.nz
- Alice Blackwell, The Property Group Limited, ablackwell@propertygroup.co.nz

THE QUALITY OF PUBLIC NOTIFICATION

The [public notice](#) for contracted emergency housing indicated that the subject sites are a mix of zonings including the Commercial 4 – City Entranceway Zone and Residential 2 – Medium Density Residential Zone under the Operative Rotorua District Plan (District Plan). The criteria related to zoning were not clarified and should have been to ensure relevant feedback.

The same [public notice](#) indicates that all thirteen resource consent applications were applied for as a Non-Complying Activity in accordance with Sections 104D of the Resource Management Act 1991. The applicable criteria from the RMA were not clarified and should have been to elicit relevant feedback.

The public notification of each of the full resource consent applications was inadequate. For example, the [Publicly Notified Resource Consent Application: RC17647 – 131 Lake Road, Rotorua](#) dated 11 June 2022 stated, as did the other 11 applications, that

To view the full application, visit www.rotorualakescouncil.nz/contractedemergencyhousing . The application will be found under the Planning Guidance & Resource Consents section in 'Publicly Notified Resource Consents'.

This website was not operational during the consultation period. While the full applications may have been available elsewhere, this non-operational website was the major point of contact for citizens potentially affected by the proposed consents and may have deterred them

from gaining access to the information that they are entitled to under the [Local Government Official Information and Meetings Act](#).

These flaws in the consultation process may have helped predetermine outcomes, mobilized bias and served improper purposes.

CONDITIONS SOUGHT BY MHUD'S CONSENT APPLICATIONS

The public notice defines 'contracted emergency housing' as where MHUD contract specific motels to provide emergency accommodation for families/whānau with children, young people, and people with disabilities. The provision also can include kuia, kaumātua, and elderly individuals.

The provision is to be exclusive - MHUD proposes to contract the whole of each motel for emergency housing for five years. No other guests will be allowed stay at each motel while it is contracted by MHUD for those five years. There will be an unacceptably high degree of redundancy in these arrangements, at public expense.

MHUD has indicated that 'wrap-around support services' will be provided for those staying in contracted emergency housing. It is proposed that this support is provided by a service provider, either Visions of a Helping Hand, Emerge Aotearoa or WERA Aotearoa. Support will allegedly involve:

- Assessing the immediate needs of each whānau/family.
- Working alongside the whānau/family during their stay to manage any issues related to their stay.
- Assisting them in finding more permanent housing options.
- 24/7 on-site security and on-site social workers .

RDRR is concerned that the following issues and service conditions were not addressed in the public notice or in the additional materials, and now need to be, ***before resource consent is given***:

- **The needs assessments** of the homeless are apparently to be provided by Te Taumata o Ngāti Whakaue at Te Kopakū (The Hub) but need to be clarified in professional terms to ensure that they are efficient and effective. Additionally, since it being funded by public

monies, The Hub needs to clarify its role, reporting lines, expertise, performance indicators, supervision and accountabilities.

- **The so-called ‘wrap-around support services’** need to be clarified; objectives, nature and professional standards to ensure adequacy, appropriateness and sustainability over time. The services should be professionally standardized and justified using an evidence-based approach or they could lack efficiency and effectiveness and waste public money.
- **The variances in ‘wrap-around support services’** evident in Appendix 1 indicate that the three providers are working to different models which need to be resolved in the interests of equity, efficiency, and effectiveness. For example, some providers will deliver 24/7 security whereas others will only provide 24/7 security on call.
- **There are no assurances or incentives** for the three service providers to assist those staying in contracted emergency housing to find “more permanent housing options.” The estimates that the average stay will be 2-3 months, the longest stay will be 19 months and the shortest 3 days, appear contrived. The three service providers have very little control over the availability of rental properties or new builds.
- **It is not clear who will be managing the system** to ensure maximum occupancy and through-put and to guarantee the quality of support and security, protecting the environment and providing public accountability. The rights of nearby residents must be protected with authorised, planned and active supervision of the service providers and to guarantee a route for feedback and public accountability over the years of consent.

LIKELY ENVIRONMENTAL IMPACTS

There is a widespread perception that consenting these 13 motels for five years to provide emergency housing will **reduce real estate values of homes** in their vicinity by about \$100,000-\$200,000. Several real estate professionals have confirmed that when Council announced the proposed revocation and sale of 10 reserves there was an immediate loss of house values at about this scale. There is anger that the retirement nest egg of many residents and ratepayers will be affected by the proposed 13 resource consents in a context of rising rates and inflation.

The second impact [deeply resented](#) is the prospect of five-year resource consents for Rotorua’s new homeless industry **irreparably undermining the recovery of tourism and fundamentally altering the character of Rotorua without the informed consent of citizens**. This is widely regarded as an improper purpose, especially with a new Council to be elected on 8 October 2022 that could well take a very different view in the wisdom of a homeless industry.

A key factor is that the focus on the needs of the homeless fail to mention the needs of the people affected by this housing. There has been no consideration for the mental health and wellbeing of neighbours affected by the housing of the homeless within their suburbs.

Many have responded to this policy blind spot by leaving Rotorua in despair. Council has been alerted to this growing emigration but has not measured it despite repeated requests that it does so. RDRR members with tourism-related businesses share the view that Rotorua's homeless industry in general, and the 13 resource consents applied for by MHUD in particular, will significantly retard the recovery of tourism industry. Hence, it would be seen as very helpful if the proposed five-year length of the resource consents were denied or, at most, limited to one year.

The third impact deeply resented is the extent to which, since the Labour government came into office five years ago, **public resources have been wasted**. Over [\\$1 Billion](#) has been diverted to motel owners in a few selected cities to accommodate the homeless; Rotorua being one. 4,000 households across New Zealand are now living in motels. MSD Minister Sepuloni has said that it's not a long-term solution but also asserted that there is no other option and motel accommodation is used a last resort. There are 27,200 people are now waiting for a state house, a record.

There are other contributing causes to the housing crisis, such as previous government policies, and not classifying four Gibraltar board factories in Auckland during level four COVID lockdown as an essential service. The Healthy Homes Act and cancelling interest deductibility for landlords have contributed to rent increases, decreased rental supply as landlords sold up, which exacerbated the housing shortage, leading to more homelessness, and so on. The point is that **the MHUD applications are part of a wider muddled central government strategy that is increasingly being contested because of the perverse outcomes it has created**.

The nature and rate of local progress was revealed at the opening of three new two-bedroom homes replacing a former three-bedroom Kāinga Ora home on the property at May Road. The event was confused by a [mayoral blunder](#) that claimed that Rotorua needed 6,000 new homes "immediately" rather than the predictions by contracted experts that Rotorua needed an additional 6,000 public and private homes within the "next decade".

Despite the confusion, Kāinga Ora Regional Director Darren Toy said the three homes were the first of 37 homes being built on existing Kāinga Ora sites in Rotorua. They make up about 260 public houses under construction or being planned in Rotorua, he said. It is current government policy that new public houses be given to "the most needy" in New Zealand, he confirmed, although local factors such as schools and work would be considered. This meant that there is **no guarantee that Rotorua people will be first in line for homes built in Rotorua, which many regard as an improper purpose**.

Another form of improper purpose is the scale of throughput proposed by the MHUD applications. As summarized in Appendix 1, and further clarified by a [more recent report](#), if the applications by MHUD are successful, the 13 motels will cater for over 1,000 homeless people every 2-3 months. If three cohorts of about 1,000 pass through the 13 motels each year for five years, it will mean that about 15,000 will need homes over the period. **This scale of throughput is not feasible, has not been formally endorsed as Council policy in a context of an imminent local election, and the MHUD applications could therefore reflect improper purposes.**

However, with new builds ranging between 200-300 per annum since about 2007, and consents rising in recent times to about 400-550 per annum, this is about one tenth of the scale required over five years. **A pragmatic solution would be to have MSD cut the inflow, deduct the number of people leaving from population estimates and refuse the MHUD applications because the combined throughput cannot possibly be housed, therefore constituting improper purposes.**

The origin of Council's now obsolete estimates and working assumptions are known. In March 2020, an [Infometrics' report](#) to Council predicted an increase of population by 5,900 people by 2051, under low growth-rate assumptions. Under high-growth assumptions it predicted an increase of population of 28,900 people by 2051. Assuming the high growth rate, there would be a 37.9% increase over 31 years, which would equate to a 1.2% increase per annum in population. Low-growth assumptions would mean little more than flat-lining growth. **Since then, Council has persisted in using the high growth assumptions, despite mounting evidence that low growth assumptions are warranted. An incoming Council could well adopt much more modest 'growth' assumptions.**

For example, in a Checkpoint interview on 1 July 2022, resident Carolyn Hall said seven of her neighbours had sold up and moved due to the law-and-order problems emanating from the Fenton Street motels that house homeless. She asked if crime continues to increase with job losses from tourism and associated industries, how many more residents will leave the district? It is critical to note that the impact of COVID-19 pandemic was not considered in any of the Infometric projections.

Further, according to the March 2020 Infometrics report, the construction industry is expected to grow from 2,700 to 3,300 between 2019 and 2029 (annual average growth of 2.03%) to keep pace with population growth and eliminate the housing shortage in Rotorua. Since then, however, building costs and delays have increased, compounded by labour and material shortages, supply chain problems, inflation, and the COVID pandemic. These factors have not been factored into Council's 'growth' assumptions.

Recent confidential discussions between RDRR and leaders in the business sector have confirmed that private sector investment is being actively withheld until there is greater certainty regarding risks. **With increased crime associated with housing the homeless in motels, Rotorua's reputation as a safe tourist and investment destination have been badly affected.**

There is also a fear that, given the increase of social housing stock in Rotorua planned by Kāinga Ora, average real estate values could fall significantly. In addition to the increase in construction costs, the Rotorua Lakes Council are proposing to re-introduce development contributions. This will add to the cost of building over and above substantial financial contributions being demanded for infrastructure. Investors are also unsure if the private sector will be able to compete with the public sector, who seem to be receiving benefits at secret 'mates' rates', to build social housing on reserves and to buy land at a reduced rate from Council.

Finally, support for the MHUD's applications may have collapsed in the Council and in central government, if mayoral candidate Fletcher Tabuteau is to be believed when he [claimed](#) on 7 July that "the government will [soon] announce an end to the practice of providing emergency housing to "out of towners".

He also claimed that the coming policy flip was a result of a petition he launched in June, which only attracted 53 signatures. Given that Tabuteau recently worked for the Council for most of a year in the Planning Department, and his campaign launch was actively supported by the outgoing mayor, it appears that the informal policy context supporting MHUD's Applications has changed dramatically and fundamentally to the point where its purposes may be obsolete. **It would be wise, RDRR contends, to await the outcomes of the 8 October 2022 local elections.**

SUMMARY

This submission by RDRR opposes all 13 resource consent applications, or at least, limits the time period to one year to await the outcomes of the local elections on 8 October 2022.

The notification and consultation process exhibited predetermination, bias and improper purposes.

The criteria regarding zoning were not clarified and should have been to ensure relevant feedback. The applicable criteria from the RMA were not clarified and should have been to elicit relevant feedback.

A non-operational website was the major point of contact for citizens and may have deterred concerned citizens from gaining access to the information that they are entitled to under LGOIMA.

There are no assurances or incentives for the three service providers to find “more permanent housing options.”

The needs assessments of the homeless and the so-called ‘wrap-around support services’ need to be clarified in professional terms, standardized and justified.

The variances in ‘wrap-around support services’ indicate that the three providers are working to different models which needs to be resolved.

It is not clear who will be managing the homeless system in Rotorua.

The unacceptable environmental effects of the resource consents may

- Reduce the real estate values of homes in the vicinity of the 13 motels
- Irreparably undermine the recovery of tourism and fundamentally alter the character of Rotorua without the informed consent of citizens, both improper purposes
- The waste of public resources involved
- The MHUD applications are part of a wider muddled strategy that is increasingly being contested because of the perverse outcomes it has created
- No guarantee that Rotorua people will be first in line for homes built in Rotorua, which many regard as an improper purpose, and
- The scale of throughput of homeless people is not feasible, has not been formally endorsed as Council policy, and the MHUD applications could therefore reflect improper purposes.

The RDRR endorses the concerns of Restore Rotorua Inc, specifically that

- Adverse effects of existing emergency housing in central Rotorua have been significant, and the potential cumulative social, economic and environmental effects of the Applications are significant and unacceptable;
- The significant adverse effects associated with the Applications cannot be avoided, remedied or mitigated and therefore the Applications should not be granted;
- The significant adverse effects associated with the Applications are long term, particularly when considered in conjunction with the time for which the sites have already been operating and with the other emergency housing sites in Rotorua;
- The Applications, if granted in total or in part, raise safety issues in central Rotorua, which is already a significant concern for CBD users;

- The economic effects of the Applications, both in terms of lost tourism revenue with the use of hotels and motels for emergency housing, and the associated lost tourism revenue associated with safety concerns in the CBD;
- The Applications are inconsistent with the policy framework in the Rotorua District Plan;
- The Applications, which are for non-complying activities, will not comply with s 104D(1)(a) or (b) of the RMA.
- The Applications are inconsistent with the policy framework in the Bay of Plenty Regional Policy Statement;
- The Applications are inconsistent with the objectives and policies of the National Policy Statement for Urban Development 2020;
- The Applications do not give effect to Part 2 of the RMA.

CONCLUDING NOTE

RDRR requests that the 13 Applications be declined, or at least, the period of consents be limited to one year to respect the outcomes of the 8 October 2022 local elections.

This feedback is provided in good faith by the members, associates, and friends of the RDRR. RDRR wishes to be heard in support of its submission. The designated spokesperson for RDRR is Dr Reynold Macpherson, [REDACTED]
[REDACTED]

RDRR is aware that the Rotorua Lakes Council has delegated its functions, powers and duties to an Independent Hearing Panel to hear and decide this application. This is most welcome.

RDRR is campaigning for a pragmatic alternative to the Applications:

- Have MSD limit the inflow to proven locals.
- Deduct the number of people leaving from Rotorua's population estimates.
- Refuse the MHUD applications because the combined throughput of emergency accommodation can never be housed.
- Revise the Council's housing policy using low growth assumptions.
- Investigate the possibility that support for the MHUD's applications may have collapsed in Council and in central government, effectively rendering the proposals null and void, and their purposes improper.

Thank you.

Inquiries to Reynold Macpherson, [REDACTED]
[REDACTED]

APPENDIX 1 - SUMMARY OF APPLICATIONS BY MHUD FOR CONTRACTED EMERGENCY HOUSING CONSENTS

	Application	Motel Name	Address(es)	Max Occupants*	Units	Term	Typical Stay	Longest Stay	Shortest Stay	Support Provider	On-site Support	On-site Security	Zone
1	RC17673	Union Victoria	26/28 Victoria	76	20	5 yrs	2-3 mths	19 mths	3 days	Visions of a Helping Hand	Soc Wkrs M-F 8.30-5 24/7	24/7 oncall	Comm 4 & Resi 2
2	RC17889	Rotovegas	249-251 Fenton & 14-16 Toko	108	26	5 yrs	2-3 mths	19 mths	3 days	WERA Aotearoa	M-F 9-5	24/7	Comm 4 & Resi 2
3	RC17761	Pohutu	3 Meade	58	14	5 yrs	2-3 mths	19 mths	3 days	Visions of a Helping Hand	Soc Wkrs M-F 8.30-5 24/7	24/7 oncall	Comm 4
4	RC 17650	Newcastle	18 Ward	64	16	5 yrs	2-3 mths	19 mths	3 days	Visions of a Helping Hand	Soc Wkrs M-F 8.30-5 24/7	24/7 oncall	Comm 4
5	RC17890	Midway	293 Fenton	90	50	5 yrs	2-3 mths	19 mths	3 days	Emerge Aotearoa	M-F 8-5 Kaitiaki 4/7	24/7	Resi 2
6	RC17762	Malones	321 Fenton	66	20	5 yrs	2-3 mths	19 mths	3 days	Visions of a Helping Hand	Soc Wkrs M-F 8.30-5 24/7	24/7 oncall	Comm 4
7	RC17647	Lake Rotorua	131 Lake	140	38	5 yrs	2-3 mths	19 mths	3 days	Visions of a Helping Hand	Soc Wkrs M-F 8.30-5 24/7	24/7 oncall	Comm 4
8	Rc17891	Geneva	299 Fenton	52	14	5 yrs	2-3 mths	19 mths	3 days	Emerge Aotearoa	M-F 8-5 Kaitiaki 4/7	24/7	Comm 4
8	RC17887	Ascot	247 Fenton & 12 Toko	54	14	5 yrs	2-3 mths	19 mths	3 days	WERA Aotearoa	M-F 9-5	24/7	Comm 4 & Resi 2
10	RC17893	Apollo	7 Tyron	117	39	5 yrs	2-3 mths	19 mths	3 days	WERA Aotearoa	M-F 9-5	24/7	Comm 3
11	RC17892	Ann's Volcanic	107 Malfroy	39	10	5 yrs	2-3 mths	19 mths	3 days	Emerge Aotearoa	M-F 8-5 Kaitiaki 4/7	24/7	Resi 2
12	RC17648	Alpin	16 Sala	142	40	5 yrs	2-3 mths	19 mths	3 days	Visions of a Helping Hand	24/7 on call	24/7	Comm 4
13	RC18244	Emerald Spa	284-286 Fenton	93	29	5 yrs	2-3 mths	19 mths	3 days	Visions of a Helping Hand	24/7 on call	24/7	Comm 4
	Totals			1099	330								

* Excludes motel staff and children under 18 months

FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991 (Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: <i>Rotorua District Council</i> <hr/> <i>Ratepayers Association</i> (Full Name)
---	--

This is a submission on an application from: *Reynold Mayhewson*
(Name of applicant)

for a Resource Consent to: *use various sites and entire buildings for within zone for continued emergency housing*
at: *12 locations for a term of 12 years*
[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are: *NO*

[Give Details]

My submission is: *attached*

[include -

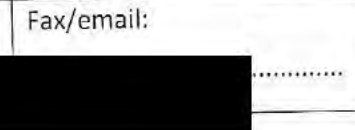
- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views]

I seek the following decision from the consent authority:

deny the application or reduce to 1 year

[Give precise details, including the general nature of any conditions sought]

I wish to be heard in support of my submission.
 * If others make a similar submission, I will consider presenting a joint case with them at a hearing.
 * ~~Delete if you would not consider presenting a joint case~~

Signature of submitter (or person authorised to sign on behalf of submitter): <u><i>Reynold Mayhewson</i></u>	Date: <u><i>11/7/22</i></u>
Add: 	Telephone: 
Contact person: [name and designation, if applicable] 	Fax/email: 

SUBMISSION TO ROTORUA LAKES COUNCIL AND THE PROPERTY GROUP LIMITED
RE MHUD'S APPLICATION FOR 12 RESOURCE CONSENTS TO USE VARIOUS SITES AND
EXISTING BUILDINGS WITHIN THOSE SITES FOR CONTRACTED EMERGENCY HOUSING WITH A
TERM OF FIVE YEARS

by ROTORUA DISTRICT RESIDENTS AND RATEPAYERS

Monday 11 July 2022

EXECUTIVE SUMMARY

This submission makes 11 points to oppose all 12 resource consent applications and makes three requests:

1. The notification and consultation process exhibited predetermination, bias and improper purposes, and irrelevant considerations being taken into account;
2. The criteria regarding zoning were not clarified and should have been to ensure relevant feedback;
3. The applicable criteria from the RMA were not clarified and should have been to elicit relevant feedback;
4. A website that was the major point of contact for citizens was non-operational and may have deterred concerned citizens from gaining access to the information that they are entitled to under LGOIMA;
5. There are no assurances or incentives for the three service providers to find more permanent housing options;
6. The needs assessments of the homeless methodology needs to be clarified in professional terms;
7. The so-called 'wrap-around support services' need to be clarified, and professionally standardized and justified;
8. The variances in 'wrap-around support services' indicate that the three support providers are working to different well-being models which need to be resolved before resource consent is given; and
9. It is not clear who will be managing the homeless system in Rotorua;
10. The unacceptable environmental effects of the proposed resource consents include
 - a. Reducing the real estate values of homes in the vicinity of the 12 motels
 - b. Undermining the recovery of tourism and fundamentally altering the character of Rotorua without the informed consent of citizens, both improper purposes
 - c. A waste of public resources in a context of inflation and rates rises

- d. The MHUD applications are part of a wider muddled strategy that is increasingly being contested because of the perverse outcomes it has created
 - e. No guarantee that Rotorua people will be first in line for homes built in Rotorua, which many regard as an improper purpose, and
 - f. The scale of proposed throughput of homeless people is not feasible, has not been formally endorsed as Council policy, which reflect improper purposes;
11. The RDRR endorses the concerns of Restore Rotorua Inc (RRI), specifically that
- a. Adverse effects of existing emergency housing in central Rotorua have been significant, and the potential cumulative social, economic and environmental effects of the Applications are significant and unacceptable;
 - b. The significant adverse effects associated with the Applications cannot be avoided, remedied or mitigated and therefore the Applications should not be granted;
 - c. The significant adverse effects associated with the Applications are long term, particularly when considered in conjunction with the time for which the sites have already been operating and with the other emergency housing sites in Rotorua;
 - d. The Applications, if granted in total or in part, raise safety issues in central Rotorua, which is already a significant concern for CBD users;
 - e. The economic effects of the Applications, both in terms of lost tourism revenue with the use of hotels and motels for emergency housing, and the associated lost tourism revenue associated with safety concerns in the CBD;
 - f. The Applications are inconsistent with the policy framework in the Rotorua District Plan;
 - g. The Applications, which are for non-complying activities, will not comply with s 104D(1)(a) or (b) of the RMA.
 - h. The Applications are inconsistent with the policy framework in the Bay of Plenty Regional Policy Statement;
 - i. The Applications are inconsistent with the objectives and policies of the National Policy Statement for Urban Development 2020;
 - j. The Applications do not give effect to Part 2 of the RMA.
12. RDRR requests that the Applications be declined, or at least limited to one year, and to be heard in support of its submission.
13. RDRR requests, pursuant to section 100A of the Act, that the Council delegates its functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.
14. RDRR requests that pragmatic alternatives to the Applications be considered:

- a. have MSD limit the inflow to proven locals, deduct the number of people leaving from population estimates and refuse the MHUD applications because the combined throughput can never be housed;
- b. a fundamental housing policy flaw is that Council has persisted in using the high growth assumptions, despite evidence mounting that low growth assumptions are warranted, and;
- c. since support for the MHUD's applications may have collapsed in Council and in central government, it asks that Commissioners to regard the Applications as null and void.

BACKGROUND

This submission to the Rotorua Lakes Council (Council) is on behalf of the 1,093 members, associates and friends of the Rotorua District Residents and Ratepayers (RDRR).

Twelve Applications by Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development (MHUD) were publicly notified 11 June 2022 in the Rotorua Daily Post. They are summarized as Appendix 1.

The complexity of the submission process and requirements was protested by many parties as unreasonable. The process and requirements were then changed, poorly advertised, and caused even more confusion. One result was the RDRR's normal gathering of feedback was delayed, then disrupted, and only permitted one relatively brief round of consultation.

Please note that a link to the replies from MHUD to the Council's request for more information, and the Beca Social Impact Assessment attached to each property, was not made available to the RDRR until 6 July, too late to be given a detailed evaluation.

There is considerable concern in the RDRR that the decision-making process has evidenced predetermination, bias and improper purposes, and that irrelevant considerations have been taken into account.

MAKING THIS SUBMISSION

The 12 Applications relate to the following addresses:

1. RC17647 - Lake Rotorua Motel - 131 Lake Road, Rotorua;
2. RC17648 - Alpin Motel - 16 Sala Street, Rotorua;

3. RC 17650 – New Castle Motor Lodge - 18 Ward Street, Rotorua;
4. RC17662 – Malones Spa Motel – 321 Fenton Street, Rotorua;
5. RC17661 – Pohutu Lodge – 3 Meade Street, Rotorua;
6. RC17673 – Union Victoria Motel – 26/28 Victoria Street, Rotorua;
7. RC17887 – Ascot on Fenton - 247 Fenton Street & 12 Toko Street, Rotorua;
8. RC17889 – Roto Vegas Motel – 249-251 Fenton Street & 14-16 Toko Street, Rotorua;
9. RC17890 – Midway Motel – 293 Fenton Street, Rotorua;
10. RC17891 – Geneva Motor Lodge – 299 Fenton Street, Rotorua;
11. RC17892 – Ann’s Volcanic – 107 Malfroy Road, Rotorua; and
12. RC17893 – Apollo Motel – 7 Tryon Street, Rotorua.

The Applications all relate to a request to use the sites and buildings within those sites for Contracted Emergency Housing with a term of five years. The proposed activities at the above sites are for various occupation levels and unit numbers.

The RDRR is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

RDRR’s submission relates to all parts of the Applications. Given the changed, confused and confusing requirements regarding making a submission, RDRR decided to email it, with a completed Form 13, simultaneously to

- Bethany Bennie, Boffa Miskell at bethany.bennie@boffamiskell.co.nz
- Council’s Planning Department at planning.submissions@rotorualc.nz
- Alice Blackwell, The Property Group Limited, ablackwell@propertygroup.co.nz

THE QUALITY OF PUBLIC NOTIFICATION

The [public notice](#) for contracted emergency housing indicated that the subject sites are a mix of zonings including the Commercial 4 – City Entranceway Zone and Residential 2 – Medium Density Residential Zone under the Operative Rotorua District Plan (District Plan). The criteria regarding zoning were not clarified and should have been to ensure relevant feedback.

The same [public notice](#) indicates that the twelve resource consent applications have been applied for as a Non-Complying Activity in accordance with Sections 104D of the Resource Management Act 1991. The applicable criteria from the RMA were not clarified and should have been to elicit relevant feedback.

The public notification of each of the full resource consent applications was inadequate. For example, the [Publicly Notified Resource Consent Application: RC17647 – 131 Lake Road, Rotorua](#) dated 11 June 2022 stated, as did the other 11 applications, that

To view the full application, visit www.rotorualakescouncil.nz/contractedemergencyhousing . The application will be found under the Planning Guidance & Resource Consents section in ‘Publicly Notified Resource Consents’.

This website was not operational during the consultation period. While the full applications may have been available elsewhere, this non-operational website was the major point of contact for citizens potentially affected by the proposed consents and may have deterred them from gaining access to the information that they are entitled to under the [Local Government Official Information and Meetings Act](#).

These flaws in the consultation process may have helped predetermine outcomes, mobilized bias and served improper purposes.

CONDITIONS SOUGHT BY MHUD’S CONSENT APPLICATIONS

The public notice defines ‘contracted emergency housing’ as where MHUD contract specific motels to provide emergency accommodation for families/whānau with children, young people, and people with disabilities. The provision also can include kuia, kaumātua, and elderly individuals.

The provision is to be exclusive - MHUD proposes to contract the whole of each motel for emergency housing for five years. No other guests will be allowed stay at each motel while it is contracted by MHUD for those five years. There will be high degree of redundancy in these arrangements at public expense.

MHUD has indicated that ‘wrap-around support services’ will be provided for those staying in contracted emergency housing. It is proposed that this support is provided by a service provider, either Visions of a Helping Hand, Emerge Aotearoa or WERA Aotearoa. Support will allegedly involve:

- Assessing the immediate needs of each whānau/family

- Working alongside the whānau/family during their stay to manage any issues related to their stay
- Assisting them in finding more permanent housing options
- 24/7 on-site security and on-site social workers

RDRR is concerned that the following issues and service conditions were not addressed in the public notice or in the additional materials, and now need to be, before resource consent is given:

- **The needs assessments** of the homeless are apparently to be provided by Te Taumata o Ngāto Whakaue at The Hub but need to be clarified in professional terms to ensure that they are efficient and effective. Additionally, since it being funded by public monies, The Hub needs to clarify its role, reporting lines, expertise, performance indicators, supervision and accountabilities.
- **The so-called ‘wrap-around support services’** need to be clarified; objectives, nature and professional standards to ensure adequacy, appropriateness and sustainability over time. The services should be professionally standardized and justified using an evidence-based approach or they could lack efficiency and effectiveness and waste public money.
- **The variances in ‘wrap-around support services’** evident in Appendix 1 indicate that the three providers are working to different models which need to be resolved in the interests of equity, efficiency, and effectiveness. For example, some providers will deliver 24/7 security whereas others will only provide 24/7 security on call.
- **There are no assurances or incentives** for the three service providers to assist those staying in contracted emergency housing to find “more permanent housing options.” The estimates that the average stay will be 2-3 months, the longest stay will be 19 months and the shortest 3 days appear contrived. The three service providers have very little control over the availability of rental properties or new builds.
- **It is not clear who will be managing the system** to ensure maximum occupancy and through-put and to guarantee the quality of support and security and the environment. The rights of nearby residents must be protected by the planned and active supervision of the service providers and to guarantee a route for feedback and public accountability over the years of consent.

LIKELY ENVIRONMENTAL IMPACTS

There is a widespread perception that consenting these 12 motels for five years to provide emergency housing will **reduce real estate values of homes** in their vicinity by about \$100,000-

\$200,000. Several real estate professionals have confirmed that when Council announced the proposed revocation and sale of 10 reserves there was an immediate loss of house values at about this scale. There is anger that the retirement nest egg of many residents and ratepayers will be affected by the proposed 12 resource consents in a context of rising rates and inflation.

The second impact [deeply resented](#) is the prospect of five-year resource consents for Rotorua's new homeless industry **irreparably undermining the recovery of tourism and fundamentally altering the character of Rotorua without the informed consent of citizens**. This is widely regarded as an improper purpose.

A key factor is the focus on the needs of the homeless without mention of the needs of the people affected by this housing. There has been no consideration for the mental health and wellbeing of neighbours affected by the housing of the homeless within their suburbs.

Many have responded to this policy blind spot by leaving Rotorua in despair. Council has been alerted to this growing emigration but has not measured it. RDRR members with tourism-relation businesses share the view that Rotorua's homeless industry in general, and the 12 resource consents applied for by MHUD in particular, will significantly retard the recovery of tourism industry. Hence, it would be seen as very helpful if the proposed five-year length of the resource consents were denied or, at most, limited to one year.

The third impact deeply resented is the extent to which, since the Labour government came into office five years ago, **public resources have been wasted**. Over [\\$1 Billion](#) has been diverted to motel owners in a few selected cities to accommodate the homeless; Rotorua being one. 4,000 households across New Zealand are now living in motels. MSD Minister Sepuloni has said that it's not a long-term solution but asserted that there is no other option and motel accommodation is used a last resort. There are 27,200 people are now waiting for a state house, a record.

There are other contributing causes to the housing crisis, such as previous government policies, and not classifying four Gibraltar board factories in Auckland during level four COVID lockdown as an essential service. The Healthy Homes Act and cancelling interest deductibility for landlords have contributed to rent increases, decreased rental supply as landlords sold up, which exacerbated the housing shortage, leading to more homelessness, and so on. The point is that **the MHUD applications are part of a wider muddled central government strategy that is increasingly being contested because of the perverse outcomes it has created**.

The nature and rate of local progress was revealed at the opening of three new two-bedroom homes replacing a former three-bedroom Kāinga Ora home on the property at May Road. The event was confused by a [mayoral blunder](#) that claimed that Rotorua needed 6,000 new homes

"immediately" rather than the predictions by contracted experts that Rotorua needed an additional 6,000 public and private homes within the "next decade".

Despite the confusion, Kāinga Ora Regional Director Darren Toy said the three homes were the first of 37 homes being built on existing Kāinga Ora sites in Rotorua. They make up about 260 public houses under construction or being planned in Rotorua, he said. It is current government policy that new public houses be given to "the most needy" in New Zealand, he confirmed, although local factors such as schools and work would be considered. This meant that there is **no guarantee that Rotorua people will be first in line for homes built in Rotorua, which many regard as an improper purpose.**

Another form of improper purpose is the scale of throughput proposed by the MHUD applications. As summarized in Appendix 1, and further clarified by a [more recent report](#), if the applications by MHUD are successful, the 12 motels will cater for up to 1,008 homeless people for 2-3 months. If three cohorts of about 1,000 pass through the 12 motels each year for five years, it will mean that about 15,000 will need homes over the period in addition to the housing needs of about 850 MSD clients already in Fenton Street motels. **This scale of throughput is not feasible, has not been formally endorsed as Council policy, and the MHUD applications could therefore reflect improper purposes.**

It is an open question as to how many motels the government are planning to use for emergency housing in Rotorua. Housing Minister Megan Woods has said she wants to reduce the number of motel emergency housing providers from 45 to 30 motels, a reduction of about one third. If the annual throughput capacity of MSD's currently contracted motels (1,121) is reduced by this order, they will still process about 750 people annually.

Adding the MHUD's proposed throughput to MSD's current throughput indicates that about 3,750 homeless people are to be processed annually. If they comprise household units of about 3 people, we will need about 1,250 new homes to be built annually. However, with new builds ranging between 200-300 per annum since about 2007, and consents rising in recent times to about 400-550 per annum, this is about one third of the scale required. **A pragmatic solution would be to have MSD cut the inflow, deduct the number of people leaving from population estimates and refuse the MHUD applications because the combined throughput cannot possibly be housed.**

The origin of Council's now obsolete estimates and working assumptions are known. In March 2020, an [Infometrics' report](#) to Council predicted an increase of population by 5,900 people by 2051, under low growth-rate assumptions. Under high-growth assumptions it predicted an

increase of population of 28,900 people by 2051. Assuming the high growth rate, there would be a 37.9% increase over 31 years, which would equate to a 1.2% increase per annum in population. Low-growth assumptions would mean little more than flat-lining growth. **Since then, Council has persisted in using the high growth assumptions, despite mounting evidence that low growth assumptions are warranted.**

For example, in a Checkpoint interview on 1 July 2022, resident Carlyne Hall said seven of her neighbours had sold up and moved due to the law-and-order problems emanating from the Fenton Street motels that house homeless. She asked if crime continues to increase with job losses from tourism and associated industries, how many more residents will leave the district? It is critical to note that the impact of COVID-19 pandemic was not considered in any of the Infometric projections.

Further, according to the March 2020 Infometrics report, the construction industry is expected to grow from 2,700 to 3,300 between 2019 and 2029 (annual average growth of 2.03%) to keep pace with population growth and eliminate the housing shortage in Rotorua. Since then, however, building costs and delays have increased, compounded by labour and material shortages, supply chain problems, inflation, and the COVID pandemic.

Recent confidential discussions between RDRR and leaders in the business sector have confirmed that private sector investment is being actively withheld until there is greater certainty regarding risks. With increased crime associated with housing the homeless in motels, Rotorua's reputation as a safe tourist destination has been badly affected.

There is also a fear that, given the increase of social housing stock in Rotorua planned by Kāinga Ora, average real estate values could fall significantly. In addition to the increase in construction costs, the Rotorua Lakes Council are proposing to re-introduce development contributions. This will add to the cost of building over and above substantial financial contributions to infrastructure. Investors are also unsure if the private sector will be able to compete with the public sector, who seem to be receiving benefits at secret 'mates rates', to build social housing on reserves and to buy land at a reduced rate from Council.

Finally, support for the MHUD's applications may have collapsed in the Council and in central government, if mayoral candidate Fletcher Tabuteau is to be believed when he [claimed](#) that "the government will [soon] announce an end to the practice of providing emergency housing to "out of towners".

He also claimed that the coming policy flip was a result of a petition he launched in June, which attracted only 53 signatures. Given that Tabuteau recently worked for the Council for most of a year in the Planning Department, and his campaign launch was actively supported by the outgoing mayor, it appears that the informal policy context supporting MHUD's application has changed dramatically and fundamentally to the point where its purposes are obsolete.

SUMMARY

This submission by RDRR opposes all 12 resource consent applications, or at least, limits the time period to one year.

The notification and consultation process exhibited predetermination, bias and improper purposes.

The criteria regarding zoning were not clarified and should have been to ensure relevant feedback. The applicable criteria from the RMA were not clarified and should have been to elicit relevant feedback.

A non-operational website was the major point of contact for citizens and may have deterred concerned citizens from gaining access to the information that they are entitled to under LGOIMA.

There are no assurances or incentives for the three service providers to find "more permanent housing options."

The needs assessments of the homeless and the so-called 'wrap-around support services' need to be clarified in professional terms, standardized and justified.

The variances in 'wrap-around support services' indicate that the three providers are working to different models which needs to be resolved.

It is not clear who will be managing the homeless system in Rotorua.

The unacceptable environmental effects of the resource consents may

- Reduce the real estate values of homes in the vicinity of the 12 motels
- Irreparably undermine the recovery of tourism and fundamentally alter the character of Rotorua without the informed consent of citizens, both improper purposes
- The waste of public resources involved
- The MHUD applications are part of a wider muddled strategy that is increasingly being contested because of the perverse outcomes it has created
- No guarantee that Rotorua people will be first in line for homes built in Rotorua, which many regard as an improper purpose, and

- The scale of throughput of homeless people is not feasible, has not been formally endorsed as Council policy, and the MHUD applications could therefore reflect improper purposes.

The RDRR endorses the concerns of Restore Rotorua Inc, specifically that

- Adverse effects of existing emergency housing in central Rotorua have been significant, and the potential cumulative social, economic and environmental effects of the Applications are significant and unacceptable;
- The significant adverse effects associated with the Applications cannot be avoided, remedied or mitigated and therefore the Applications should not be granted;
- The significant adverse effects associated with the Applications are long term, particularly when considered in conjunction with the time for which the sites have already been operating and with the other emergency housing sites in Rotorua;
- The Applications, if granted in total or in part, raise safety issues in central Rotorua, which is already a significant concern for CBD users;
- The economic effects of the Applications, both in terms of lost tourism revenue with the use of hotels and motels for emergency housing, and the associated lost tourism revenue associated with safety concerns in the CBD;
- The Applications are inconsistent with the policy framework in the Rotorua District Plan;
- The Applications, which are for non-complying activities, will not comply with s 104D(1)(a) or (b) of the RMA.
- The Applications are inconsistent with the policy framework in the Bay of Plenty Regional Policy Statement;
- The Applications are inconsistent with the objectives and policies of the National Policy Statement for Urban Development 2020;
- The Applications do not give effect to Part 2 of the RMA.

CONCLUDING NOTE

RDRR requests that the Applications be declined, or at least, the period of consents be limited to one year.

This feedback is provided in good faith by the members, associates, and friends of the RDRR.

RDRR wishes to be heard in support of its submission. The designated spokespersons for RDRR are Denys Caves, [REDACTED]

RDRR is aware that the Rotorua Lakes Council has delegated its functions, powers and duties to an Independent Hearing Panel to hear and decide this application. To be clear, RDRR requests, pursuant to section 100A of the Act, that the Council delegates its functions, powers, and duties

to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

RDRR has a pragmatic alternative to the Applications. Have MSD limit the inflow to proven locals, deduct the number of people leaving from population estimates and refuse the MHUD applications because the combined throughput of emergency accommodation can never be housed. A fundamental flaw in Council's housing policy is that it used high growth assumptions, despite evidence mounting that low growth assumptions are warranted. Finally, support for the MHUD's applications may have collapsed in Council and in central government, effectively rendering the proposals null and void, and their purposes improper.

Thank you.

Inquiries to [REDACTED]
[REDACTED]

Attachment Form 13.

APPENDIX 1 - SUMMARY OF APPLICATIONS BY MHUD FOR CONTRACTED EMERGENCY HOUSING CONSENTS

Advertised Rotorua Daily Post, 11 June 2022, pp. 10-15.

	Application	Motel Name	Address(es)	Max Occupants*	Units	Term	Typical Stay	Longest Stay	Shortest Stay	Support Provider	On-site Support	On-site Security	Zone
1	RC17673	Union Victoria	26/28 Victoria	76	20	5 yrs	2-3 mths	19 mths	3 days	Visions of a Helping Hand	Soc Wkrs M-F 8.30-5 24/7 oncall	24/7 oncall	Comm 4 & Resi 2
2	RC17889	Rotovegas	249-251 Fenton & 14-16 Toko	108	26	5 yrs	2-3 mths	19 mths	3 days	WERA Aotearoa	M-F 9-5	24/7	Comm 4 & Resi 2
3	RC17761	Pohutu	3 Meade	58	14	5 yrs	2-3 mths	19 mths	3 days	Visions of a Helping Hand	Soc Wkrs M-F 8.30-5 24/7 oncall	24/7 oncall	Comm 4
4	RC 17650	Newcastle	18 Ward	64	16	5 yrs	2-3 mths	19 mths	3 days	Visions of a Helping Hand	Soc Wkrs M-F 8.30-5 24/7 oncall	24/7 oncall	Comm 4
5	RC17890	Midway	293 Fenton	90	50	5 yrs	2-3 mths	19 mths	3 days	Emerge Aotearoa	M-F 8-5 Kaitiaki 4/7	24/7	Resi 2
6	RC17762	Malones	321 Fenton	66	20	5 yrs	2-3 mths	19 mths	3 days	Visions of a Helping Hand	Soc Wkrs M-F 8.30-5 24/7 oncall	24/7 oncall	Comm 4
7	RC17647	Lake Rotorua	131 Lake	140	38	5 yrs	2-3 mths	19 mths	3 days	Visions of a Helping Hand	Soc Wkrs M-F 8.30-5 24/7 oncall	24/7 oncall	Comm 4
8	Rc17891	Geneva	299 Fenton	52	14	5 yrs	2-3 mths	19 mths	3 days	Emerge Aotearoa	M-F 8-5 Kaitiaki 4/7	24/7	Comm 4
8	RC17887	Ascot	247 Fenton & 12 Toko	54	14	5 yrs	2-3 mths	19 mths	3 days	WERA Aotearoa	M-F 9-5	24/7	Comm 4 & Resi 2
10	RC17893	Apollo	7 Tyron	117	39	5 yrs	2-3 mths	19 mths	3 days	WERA Aotearoa	M-F 9-5	24/7	Comm 3
11	RC17892	Ann's Volcanic	107 Malfroy	39	10	5 yrs	2-3 mths	19 mths	3 days	Emerge Aotearoa	M-F 8-5 Kaitiaki 4/7	24/7	Resi 2
12	RC17648	Alpin	16 Sala	142	40	5 yrs	2-3 mths	19 mths	3 days	Visions of a Helping Hand	24/7 on call	24/7	Comm 4
	Totals			825	251								

* Excludes motel staff and children under 18 months

Note to submitter:

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

The information you have provided on this form is required so that your submission can be processed under the RMA, and your name and address will be publicly available. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission. If you would like to request access to, or correction of your details, please contact the Council.

FORM 13 SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991
(Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: <u>RICHARD Reharii JAMES</u> _____ _____ (Full Name)
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This is a submission on an application from:

Te Tūāpapa Kura Kāinga - Ministry of Housing and Urban Development (MHUD)

(Name of applicant)

for a Resource Consent to: use various sites and existing buildings within those sites for Contracted Emergency Housing with a term of five years.

Ref: RC17647, RC17648, RC17650, RC17662, RC17661, RC17673, RC17687, RC17689, RC17690, RC17691, RC17692, RC17693

at: 131 Lake Rd, 16 Sala St, 18 Wairi Ave, 321 Fenton St, 3 Meade St, 26-28 Victoria St & 5 Union St, 247 Fenton St & 12 Toko St, 249 Fenton St & 16 Toko St, 293 Fenton St, 296 Fenton St, 107 Mahoy Rd, and 7 Tyros St, Rotorua

[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

All parts of all twelve resource consent applications.

[Give Details]

My submission is:

See attached.

The assessments included with the applications conclude that the effects are less than minor and the proposals are consistent with the objectives and policies of the Rotorua District Plan.

Resource consent can be granted in accordance with Sections 104 and 104B of the Resource Management Act 1991.

[include -

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views]

I seek the following decision from the consent authority:

Grant Resource Consent to all twelve applications subject to suggested conditions outlined in the applications.

[Give precise details, including the general nature of any conditions sought]

I wish / do not wish to be heard in support of my submission.

- * If others make a similar submission, I will consider presenting a joint case with them at a hearing.
- * [Delete if you would not consider presenting a joint case]

Signature of submitter (or person authorised to sign on behalf of submitter): <u>RR James</u>	Date: <u>09/07/2022</u>
Address for service of Submitter: _____ _____ _____	Telephone: _____ _____
Contact person: [name and designation, if applicable] _____	Fax/email: _____



RRD002NZM5

Document Number: RDC-1283695

Date Registered: 12/7/2022

Note to submitter:

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

The information you have provided on this form is required so that your submission can be processed under the RMA, and your name and address will be publicly available. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission. If you would like to request access to, or correction of your details, please contact the Council.

FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

*Section 96 Resource Management Act 1991
(Rotorua Lakes Council is the operating name of Rotorua District Council)*



To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: <u>Tehuianui James</u> _____ <div style="text-align: right;"><i>(Full Name)</i></div>
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Received

3-30-11 JUL 2022

This is a submission on an application from:

Te Tōāpapa Kura Kāinga – Ministry of Housing and Urban Development (MHUD)

(Name of applicant)

**Rotorua Lakes Council
Customer Centre**

for a Resource Consent to: use various sites and existing buildings within those sites for Contracted Emergency Housing with a term of five years

Ref: RD17047, RD17048, RD17050, RD17051, RD17052, RD17053, RD17054, RD17055, RD17056, RD17057, RD17058, RD17059, RD17060, RD17061, RD17062, RD17063

at: 131 Lake Rd, 16 Sale St, 14 Ward Ave, 371 Fenton St, 3 Meads St, 25-26 Victoria St & 9 Lisle St, 241 Fenton St & 17 Toke St, 249 Fenton St & 16 Toke St, 283 Fenton St, 288 Fenton St, 107 Maleny Rd and 7 Tyron St Rotorua

[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

All parts of all iwi/eiwi resource consent applications.

[Give Details]

My submission is:

See attached.

The assessments included with the applications conclude that the effects are less than minor and the proposals are consistent with the objectives and policies of the Rotorua District Plan.

Resource consent can be granted in accordance with Sections 104 and 104B of the Resource Management Act 1991.

[include –

- *whether you support or oppose the specific parts of the application or wish to have them amended; and*
- *the reasons for your views]*

I seek the following decision from the consent authority:

Grant Resource Consent to all iwi/eiwi applications subject to suggested conditions outlined in the applications.

[Give precise details, including the general nature of any conditions sought]

I wish / do not wish to be heard in support of my submission.

* If others make a similar submission, I will consider presenting a joint case with them at a hearing.

* *[Delete if you would not consider presenting a joint case]*

Signature of submitter (or person authorised to sign on behalf of submitter): <u>James</u>	Date: <u>09/7/22</u>
Address for service of Submitter: <div style="background-color: black; height: 20px; width: 100%;"></div>	Telephone: <div style="background-color: black; height: 20px; width: 100%;"></div>

Contact person: *[name and designation, if applicable]*



RRD002NZLO

Document Number: RDC-1283680

Date Registered: 12/7/2022

Note to submitter:

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

The information you have provided on this form is required so that your submission can be processed under the RMA, and your name and address will be publicly available. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission. If you would like to request access to, or correction of your details, please contact the Council.

FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991 (Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: <u>Miria Te Whata</u> _____ _____ (Full Name)
---	---

This is a submission on an application from:

Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development (MHUD)

(Name of applicant)

for a Resource Consent to: use various sites and existing buildings within those sites for Contracted Emergency Housing with a term of five years.

Ref: RC17547, RC17648, RC17650, RC17652, RC17661, RC17673, RC17687, RC17689, RC17690, RC17691, RC17692, RC17693

at: 131 Lake Rd, 16 Sile St, 18 Ward Ave, 321 Fenlon St, 3 Meade St, 25-26 Victoria St & 5 Union St, 247 Fenlon St & 12 Toko St, 249 Fenlon St & 16 Toko St, 293 Fenlon St, 298 Fenlon St, 107 Malloy Rd, and 7 Tyron St, Rotorua

[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

All parts of all twelve resource consent applications.

[Give Details]

My submission is:

See attached.

The assessments included with the applications conclude that the effects are less than minor and the proposals are consistent with the objectives and policies of the Rotorua District Plan.

Resource consent can be granted in accordance with Sections 104 and 104B of the Resource Management Act 1991.

[include –

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views]

I seek the following decision from the consent authority:

Grant Resource Consent to all twelve applications subject to suggested conditions outlined in the applications.

[Give precise details, including the general nature of any conditions sought]

I wish / do not wish to be heard in support of my submission.

* If others make a similar submission, I will consider presenting a joint case with them at a hearing.

* [Delete if you would not consider presenting a joint case]

Signature of submitter (or person authorised to sign on behalf of submitter): _____ 	Date: <u>11/07/22</u>
Address for service of Submitter: _____ 	Telephone: _____
Contact person: [name and designation, if applicable] _____	Fax/email: _____

Note to submitter:

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

The information you have provided on this form is required so that your submission can be processed under the RMA, and your name and address will be publicly available. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission. If you would like to request access to, or correction of your details, please contact the Council.

FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991 (Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: <u>Taua Rewi</u> _____ _____ <p style="text-align: right;">(Full Name)</p>
---	--

This is a submission on an application from:

Te Tūāpeoa Kura Kāinga – Ministry of Housing and Urban Development (MHUD)

(Name of applicant)

for a Resource Consent to: use various sites and existing buildings within those sites for Contracted Emergency Housing with a term of five years.

Ref: RC17547, RC17546, RC17550, RC17552, RC17561, RC17573, RC17567, RC17580, RC17520, RC17591, RC17600, RC17593

at: 131 Lake Rd, 16 Sals St, 18 Watt Ave, 321 Fenlon St, 3 Meade St, 26-28 Victoria St & 5 Livier St, 247 Fenlon St & 12 Toko St, 249 Fenlon St & 14 Toko St, 263 Fenlon St, 269 Fenlon St, 107 Makoy Rd, and 7 Tyron St, Rotorua
[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

All parts of all twelve resource consent applications.

[Give Details]

My submission is:

See attached.

The assessments included with the applications conclude that the effects are less than minor and the proposals are consistent with the objectives and policies of the Rotorua District Plan.

Resource consent can be granted in accordance with Sections 104 and 104B of the Resource Management Act 1991.

[include –

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views]

I seek the following decision from the consent authority:

Grant Resource Consent to all twelve applications subject to suggested conditions outlined in the applications.

[Give precise details, including the general nature of any conditions sought]

I wish / do not wish to be heard in support of my submission.

- * If others make a similar submission, I will consider presenting a joint case with them at a hearing.
- * [Delete if you would not consider presenting a joint case]

Signature of submitter (or person authorised to sign on behalf of submitter): 	Date: <u>11/7/2022</u>
Address for service of Submitter: 	Telephone: 
Contact person: [name and designation, if applicable] _____	Fax/email: _____

Note to submitter:

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

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FORM 13
SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991
(Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: <u>Caleb Roberts</u> <i>(Full Name)</i>
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This is a submission on an application from:

Te Tūāpapa Kura Kāinga - Ministry of Housing and Urban Development (MHUD)

(Name of applicant)

for a Resource Consent to: use various sites and existing buildings within those sites for Contracted Emergency Housing with a term of five years.

Ref: RC17647, RC17648, RC17650, RC17662, RC17661, RC17673, RC17667, RC17669, RC17690, RC17691, RC17692, RC17693

at: 131 Lake Rd, 16 Sals St, 18 Ward Ave, 121 Fenton St, 3 Meade St, 26-28 Victoria St & 3 Union St, 247 Fenton St & 12 Toko St, 249 Fenton St & 14 Toko St, 293 Fenton St, 299 Fenton St, 107 Malloy Rd, and 7 Tyros St, Rotorua

[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

All parts of all twelve resource consent applications.

[Give Details]

My submission is:

See attached.

The assessments included with the applications conclude that the effects are less than minor and the proposals are consistent with the objectives and policies of the Rotorua District Plan.

Resource consent can be granted in accordance with Sections 104 and 104B of the Resource Management Act 1991.

[include -

- *whether you support or oppose the specific parts of the application or wish to have them amended; and*
- *the reasons for your views]*

I seek the following decision from the consent authority:

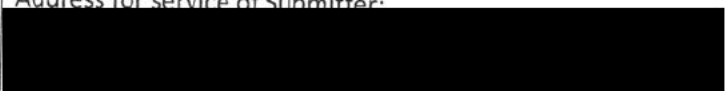

Grant Resource Consent to all twelve applications subject to suggested conditions outlined in the applications.

[Give precise details, including the general nature of any conditions sought]

I wish / do not wish to be heard in support of my submission.

* If others make a similar submission, I will consider presenting a joint case with them at a hearing.

* *[Delete if you would not consider presenting a joint case]*

Signature of submitter (or person authorised to sign on behalf of submitter): <u>CR</u>	Date: <u>08/08/2012</u>
Address for service of Submitter: 	Telephone: 
Contact person: <i>[name and designation, if applicable]</i> _____	Fax/email: _____

Note to submitter:

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

The information you have provided on this form is required so that your submission can be processed under the RMA, and your name and address will be publicly available. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission. If you would like to request access to, or correction of your details, please contact the Council.

FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

*Section 96 Resource Management Act 1991
(Rotorua Lakes Council is the operating name of Rotorua District Council)*



To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: <div style="text-align: center; font-size: 1.2em; font-family: cursive;">Ani Ruri</div> <hr style="border: 0; border-top: 1px solid black; margin: 5px 0;"/> <hr style="border: 0; border-top: 1px solid black; margin: 5px 0;"/> <div style="text-align: right; font-size: 0.8em;">(Full Name)</div>
---	--

This is a submission on an application from:

Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development (MHUD)

(Name of applicant)

for a Resource Consent to: use various sites and existing buildings within those sites for Contracted Emergency Housing with a term of five years.

Ref: RC17647, RC17648, RC17650, RC17662, RC17665, RC17667, RC17668, RC17669, RC17670, RC17671, RC17672, RC17673

at: 131 Lake Rd, 16 Sals St, 18 Watt Ave, 121 Fenlon St, 3 Meade St, 26-28 Victoria St & 5 Union St, 247 Fenlon St & 12 Toko St, 249 Fenlon St & 14 Toko St, 293 Fenlon St, 291 Fenlon St, 107 Malby Rd, and 7 Tyrone St, Rotorua

[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

All parts of all twelve resource consent applications.

[Give Details]

My submission is:

See attached.

The assessments included with the applications conclude that the effects are less than minor and the proposals are consistent with the objectives and policies of the Rotorua District Plan.

Resource consent can be granted in accordance with Sections 104 and 104B of the Resource Management Act 1991.

[include –

- *whether you support or oppose the specific parts of the application or wish to have them amended; and*
- *the reasons for your views]*

I seek the following decision from the consent authority:

Grant Resource Consent to all twelve applications subject to suggested conditions outlined in the applications.

[Give precise details, including the general nature of any conditions sought]

I wish / do not wish to be heard in support of my submission.

- * If others make a similar submission, I will consider presenting a joint case with them at a hearing.
- * *[Delete if you would not consider presenting a joint case]*

Signature of submitter (or person authorised to sign on behalf of submitter): <div style="text-align: center; font-size: 1.2em; font-family: cursive;">Ani Ruri</div>	Date: <div style="text-align: center; font-size: 1.2em; font-family: cursive;">09/07/2002</div>
Address for service of Submitter: <div style="background-color: black; height: 20px; width: 100%;"></div>	Telephone: <div style="background-color: black; height: 20px; width: 100%;"></div>
Contact person: [name and designation, if applicable]	Fax/email:

Note to submitter:

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

The information you have provided on this form is required so that your submission can be processed under the RMA, and your name and address will be publicly available. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission. If you would like to request access to, or correction of your details, please contact the Council.

FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

Section 96 Resource Management Act 1991
(Rotorua Lakes Council is the operating name of Rotorua District Council)



To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: <u>Montana Jerry</u> <hr/> <p style="text-align: right;"><i>(Full Name)</i></p>
---	---

This is a submission on an application from:

Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development (MHUD)

(Name of applicant)

for a Resource Consent to: use various sites and existing buildings within those sites for Contracted Emergency Housing with a term of five years.

Ref: RC11843, RC12644, RC11950, RC11700, RC11961, RC11763, RC11897, RC11740, RC11720, RC11701, RC11709, RC11703

at: 131 Lake Rd, 16 Side St, 15 Wairi Ave, 371 Fenton St, 3 Meane St, 26-28 Victoria St & 5 Lake St, 247 Fenton St & 12 Tearo St, 249 Fenton St & 18 Tearo St, 293 Fenton St, 295 Fenton St, 107 Malby Rd, and 7 Tyron St, Rotorua

[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

All parts of all twelve resource consent applications.

[Give Details]

My submission is:

See attached.

The assessments included with the applications conclude that the effects are less than minor and the proposals are consistent with the objectives and policies of the Rotorua District Plan.

Resource consent can be granted in accordance with Sections 104 and 104B of the Resource Management Act 1991.

[include –

- *whether you support or oppose the specific parts of the application or wish to have them amended; and*
- *the reasons for your views]*

I seek the following decision from the consent authority:

Grant Resource Consent to all twelve applications subject to suggested conditions outlined in the applications.

[Give precise details, including the general nature of any conditions sought]

I wish / do not wish to be heard in support of my submission.

- * If others make a similar submission, I will consider presenting a joint case with them at a hearing.
- * *[Delete if you would not consider presenting a joint case]*

Signature of submitter (or person authorised to sign on behalf of submitter): <u>Montana Jerry</u>	Date: <u>08/07/2007</u>
Address for service of Submitter: <div style="background-color: black; width: 100%; height: 20px;"></div>	Telephone: <div style="background-color: black; width: 100%; height: 20px;"></div>
Contact person: <i>[name and designation, if applicable]</i>	Fax/email:

Note to submitter:

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

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RFS 628774

FORM 13
SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991
(Rotorua Lakes Council is the operating name of Rotorua District Council)

To:
Chief Executive
Rotorua Lakes Council
Private Bag RO3029
ROTORUA

Name of Submitter:
Kadhana Pelulake-Pei

(Full Name)

This is a submission on an application from:

Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development (MHUD)

(Name of applicant)

for a Resource Consent to: use various sites and existing buildings within those sites for Contracted Emergency Housing with a term of five years.

Ref: RC17647, RC17648, RC17650, RC17652, RC17661, RC17673, RC17667, RC17669, RC17690, RC17691, RC17692, RC17693

at: 131 Lake Rd, 16 Sala St, 18 West Ave, 321 Fenlon St, 3 Meade St, 26-28 Victoria St & 3 Union St, 247 Fenlon St & 12 Toko St, 249 Fenlon St & 14 Toko St, 293 Fenlon St, 291 Fenlon St, 107 Makoy Rd, and 7 Tyrone St, Rotorua

[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

All parts of all twelve resource consent applications.

[Give Details]

My submission is:

See attached.

The assessments included with the applications conclude that the effects are less than minor and the proposals are consistent with the objectives and policies of the Rotorua District Plan.

Resource consent can be granted in accordance with Sections 104 and 104B of the Resource Management Act 1991.

[include –

- *whether you support or oppose the specific parts of the application or wish to have them amended; and*
- *the reasons for your views]*

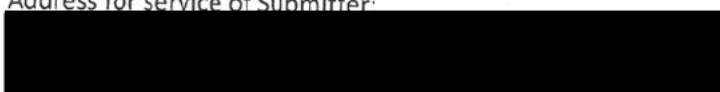

I seek the following decision from the consent authority:

Grant Resource Consent to all twelve applications subject to suggested conditions outlined in the applications.

[Give precise details, including the general nature of any conditions sought]

I wish / do not wish to be heard in support of my submission.

- * If others make a similar submission, I will consider presenting a joint case with them at a hearing.
- * *[Delete if you would not consider presenting a joint case]*

Signature of submitter (or person authorised to sign on behalf of submitter): <u><i>Kadhana Pelulake-Pei</i></u>	Date: <u>09-07-22</u>
Address for service of Submitter: 	Telephone: 
Contact person: <i>[name and designation, if applicable]</i>	Fax/email:

Note to submitter:

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

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FORM 13
SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



*Section 96 Resource Management Act 1991
(Rotorua Lakes Council is the operating name of Rotorua District Council)*

To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: <u>Cherie Anauo</u> _____ _____ (Full Name)
---	---

This is a submission on an application from:

Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development (MHUD)

(Name of applicant)

for a Resource Consent to: use various sites and existing buildings within those sites for Contracted Emergency Housing with a term of five years.

Ref: RC17647, RC17648, RC17650, RC17662, RC17661, RC17673, RC17687, RC17689, RC17690, RC17691, RC17692, RC17693

at: 131 Lake Rd, 16 Sale St, 18 Ward Ave, 321 Fernon St, 3 Maeda St, 25-26 Victoria St & 5 Union St, 247 Fernon St & 12 Toko St, 249 Fernon St & 16 Toko St, 293 Fernon St, 291 Fernon St, 167 Malloy Rd, and 7 Tyron St, Rotorua

[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

All parts of all twelve resource consent applications.

[Give Details]

My submission is:

See attached.

The assessments included with the applications conclude that the effects are less than minor and the proposals are consistent with the objectives and policies of the Rotorua District Plan.

Resource consent can be granted in accordance with Sections 104 and 104B of the Resource Management Act 1991.

[include –

- *whether you support or oppose the specific parts of the application or wish to have them amended; and*
- *the reasons for your views]*

I seek the following decision from the consent authority:

Grant Resource Consent to all twelve applications subject to suggested conditions outlined in the applications.

[Give precise details, including the general nature of any conditions sought]

I wish/ do not wish to be heard in support of my submission.

* If others make a similar submission, I will consider presenting a joint case with them at a hearing.

* *[Delete if you would not consider presenting a joint case]*

Signature of submitter (or person authorised to sign on behalf of submitter): <u>Ch Anauo</u>	Date: <u>8/7/22</u> .
Address for service of Submitter: _____ _____	Telephone: _____
Contact person: <i>[name and designation, if applicable]</i>	Fax/email:

Note to submitter:

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

The information you have provided on this form is required so that your submission can be processed under the RMA, and your name and address will be publicly available. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission. If you would like to request access to, or correction of your details, please contact the Council.

FORM 13 SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991
(Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: <u>Barbara. A. T</u> _____ _____ <p style="text-align: right;">(Full Name)</p>
---	--

This is a submission on an application from:

Te Tōiāpapa Kura Kāinga – Ministry of Housing and Urban Development (MHUD)

(Name of applicant)

for a Resource Consent to: use various sites and existing buildings within those sites for Contracted Emergency Housing with a term of five years.

Ref: RC17647, RC17648, RC17650, RC17652, RC17651, RC17673, RC17687, RC17689, RC17690, RC17691, RC17692, RC17693

at: 131 Lake Rd, 16 Sila St, 18 Waim Ave, 121 Fenlon St, 3, Meale St, 3626, Victoria St & 5 Under R, 247 Fenlon St & 12 Toko St, 249 Fenlon St & 14 Toko St, 293 Fenlon St, 294 Fenlon St, 117 Malhou Rd and 7 Turua St, Rotorua

[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

All parts of all twelve resource consent applications.

[Give Details]

My submission is:

See attached.

The assessments included with the applications conclude that the effects are less than minor and the proposals are consistent with the objectives and policies of the Rotorua District Plan.

Resource consent can be granted in accordance with Sections 104 and 104B of the Resource Management Act 1991.

[include –

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views]

I seek the following decision from the consent authority:

Grant Resource Consent to all twelve applications subject to suggested conditions outlined in the applications.

[Give precise details, including the general nature of any conditions sought]

I wish / do not wish to be heard in support of my submission.

* If others make a similar submission, I will consider presenting a joint case with them at a hearing.

* [Delete if you would not consider presenting a joint case]

Signature of submitter (or person authorised to sign on behalf of submitter): <u>[Signature]</u>	Date: <u>8/7/22</u>
Address for service of Submitter: [Redacted]	Telephone: [Redacted]
Contact person: [name and designation, if applicable] _____	Fax/email: _____

Note to submitter:

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

The information you have provided on this form is required so that your submission can be processed under the RMA, and your name and address will be publicly available. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission. If you would like to request access to, or correction of your details, please contact the Council.

FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991 (Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: <u>Ayla Shaw</u> _____ _____ (Full Name)
---	--

This is a submission on an application from:

Te Tūāpapa Kūia Kāinga – Ministry of Housing and Urban Development (MHUD)

(Name of applicant)

for a Resource Consent to: use various sites and existing buildings within those sites for Contracted Emergency Housing with a term of five years.

Ref: RC11647, RC11648, RC11650, RC11662, RC11661, RC11673, RC11687, RC11689, RC11690, RC11691, RC11692, RC11693

at: 131 Lake Rd, 1A Sels St, 9 Wied Ave, 301 Fenwick St, 3 Massey St, 24-26 Victoria St & 5 Linton St, 247 Fenwick St & 12 Toka St, 249 Fenwick St & 16 Toka St, 293 Fenwick St, 208 Fenwick St, 107 Mallory Rd, and 7 Tyndal St, Rotonga

[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

All parts of all twelve resource consent applications.

[Give Details]

My submission is:

See attached.

The assessments included with the applications conclude that the effects are less than minor and the proposals are consistent with the objectives and policies of the Rotorua District Plan.

Resource consent can be granted in accordance with Sections 104 and 104B of the Resource Management Act 1991.

[include –

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views]

I seek the following decision from the consent authority:

Grant Resource Consent to all twelve applications subject to suggested conditions outlined in the applications.

[Give precise details, including the general nature of any conditions sought]

I wish / do not wish to be heard in support of my submission.

* If others make a similar submission, I will consider presenting a joint case with them at a hearing.

* [Delete if you would not consider presenting a joint case]

Signature of submitter (or person authorised to sign on behalf of submitter): <u>[Signature]</u>	Date: <u>8.7.22</u>
Address for service of Submitter: <u>[Redacted]</u>	Telephone: <u>[Redacted]</u>
Contact person: [name and designation, if applicable] _____	Fax/email: _____

Note to submitter:

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

The information you have provided on this form is required so that your submission can be processed under the RMA, and your name and address will be publicly available. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission. If you would like to request access to, or correction of your details, please contact the Council.

We are we going to go!

FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991

(Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: <u>Jean-Ellen Pomare</u> _____ _____ (Full Name)
---	--

This is a submission on an application from:

To Te Tūāpeapa Kura Kāinga - Ministry of Housing and Urban Development (MHUD)

(Name of applicant)

for a Resource Consent to: use various sites and existing buildings within those sites for Contracted Emergency Housing with a term of five years.

Ref: RC17647, RC17648, RC17650, RC17651, RC17652, RC17653, RC17654, RC17655, RC17656, RC17657, RC17658, RC17659, RC17660, RC17661, RC17662, RC17663

at: 131 Lake Rd, 18 Lake St, 18 West Ave, 321 Fenton St, 3 Meade St, 25-28 Victoria St & 5 Linden St, 247 Fenton St & 12 Toka St, 243 Fenton St & 18 Toka St, 293 Fenton St, 289 Fenton St, 107 Makiro Rd, and 7 Tynon St, Rotorua

[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

All parts of all twelve resource consent applications.

[Give Details]

My submission is:

See attached.

The assessments included with the applications conclude that the effects are less than minor and the proposals are consistent with the objectives and policies of the Rotorua District Plan.

Resource consent can be granted in accordance with Sections 104 and 104B of the Resource Management Act 1991.

[include -

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views

I seek the following decision from the consent authority:

Grant Resource Consent to all twelve applications subject to suggested conditions outlined in the applications.

[Give precise details, including the general nature of any conditions sought]

I wish / do not wish to be heard in support of my submission.

* If others make a similar submission, I will consider presenting a joint case with them at a hearing.

* [Delete if you would not consider presenting a joint case]

Signature of submitter (or person authorised to sign on behalf of submitter): _____ 	Date: <u>08/07/22</u>
Address for service of Submitter: _____ 	Telephone: _____ 
Contact person: [name and designation, if applicable] _____	Fax/email: _____

Note to submitter:

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

The information you have provided on this form is required so that your submission can be processed under the RMA, and your name and address will be publicly available. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission. If you would like to request access to, or correction of your details, please contact the Council.


FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991

(Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: RONALD WILKIN BEERZ  _____ _____ (Full Name)
---	--

This is a submission on an application from:

RONALD WILKIN BEERZ
(Name of applicant)

Received

11 JUL 2022

for a Resource Consent to:

17661 Pohutu Lodge

Rotorua Lakes Council
Customer Centre
4.22pm

at:

3 Meads St Rotorua

(Briefly describe the type of consent, proposed activity, and location of the resource consent)

The specific parts of the application that my submission relates to are:

Emergency Housing

[Give Details]

My submission is:

I OPPOSE TO Contracted Emergency Housing - Land Use Consent
Increase in Domestic Violence / Young children on Roads
Box Rovers up a down Street all hours / Rubbish on Footpath

(include -

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views]

I seek the following decision from the consent authority:



Decline the Resource Consent application - Land use Consent

[Give precise details, including the general nature of any conditions sought]

I wish / do not wish to be heard in support of my submission.

* If others make a similar submission, I will consider presenting a joint case with them at a hearing.

* [Delete if you would not consider presenting a joint case]


Signature to sign on		Date: <u>11-07-22</u>
Address
.....	Telephone: 
.....
Contact person: [name and designation, if applicable]	Fax/email:	

FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991
(Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: KONRAD WILLIAM BEERTZ  _____ _____ (Full Name)
---	--

This is a submission on an application from:

KONRAD WILLIAM BEERTZ
(Name of applicant)

Received

11 JUL 2022

Rotorua Lakes Council
Customer Centre

for a Resource Consent to: 17891 Geneva Hotel

at: 293 Lenton St Rotorua

[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

[Give Details]

My submission is:

In OPPOSE To Contracted Emergency Housing Land Use Consent
Increase Domestic Violence / young children roaming on roads
Boy Racers up & down side street / Rubbish consistently on footpath

include -

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views]


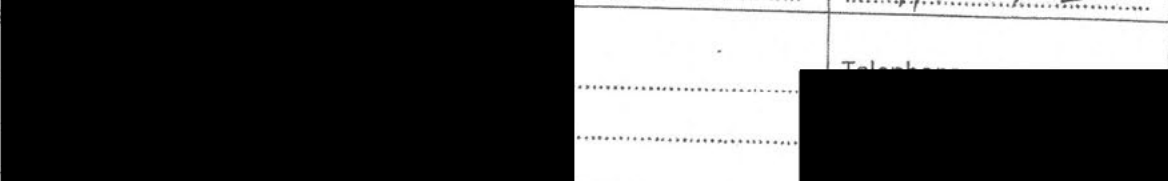
I seek the following decision from the consent authority:

Decline the Resource Consent application - Land use cons

[Give precise details, including the general nature of any conditions sought]

I wish / do not wish to be heard in support of my submission.

- * If others make a similar submission, I will consider presenting a joint case with them at a hearing.
- * [Delete if you would not consider presenting a joint case]


Signature to sign		Date: <u>11-07-22</u>
Address		
Contact person: [name and designation, if applicable]	Fax/email:	

FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991
(Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: RONALD WILLIAM BEETRI  (Full Name)
---	---

Received
 11 JUL 2022
 Rotorua Lakes Council
 Customer Centre

This is a submission on an application from:
 RONALD WILLIAM BEETRI
 (Name of applicant)

for a Resource Consent to: 17829 - Bob Vegas Motel

at: 293 Inban St Rotorua
 (Briefly describe the type of consent, proposed activity, and location of the resource consent)

The specific parts of the application that my submission relates to are:

[Give Details]

My submission is:
 I OPPOSE TO Contracted Emergency Housing - Land Use Consent
 - Boy Races up a Down Side Streets / young kids Roaming on Roads/
 - Rubbish spilled on Footpath / Domestic Violence

[include -

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views]


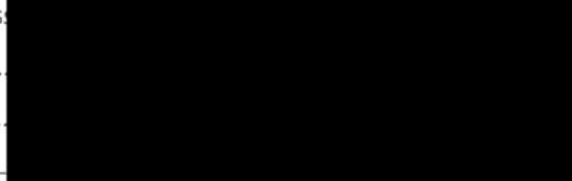
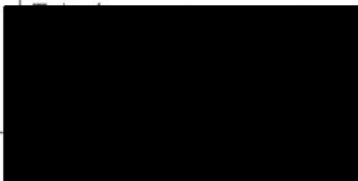

I seek the following decision from the consent authority:

Decline the Resource Consent application - Land use Consent

[Give precise details, including the general nature of any conditions sought]

I wish / do not wish to be heard in support of my submission.

- * If others make a similar submission, I will consider presenting a joint case with them at a hearing.
- * [Delete if you would not consider presenting a joint case]


Signature to sign 	Date: 11-07-22
Address 	
Contact person (name and designation, if applicable)	

FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991
(Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag R03029 ROTORUA	Name of Submitter: Ronald William Beetz  (Full Name)
---	---

Received
 11 JUL 2022
 Rotorua Lakes Council
 Customer Centre

This is a submission on an application from:
Ronald William Beetz
 (Name of applicant)

for a Resource Consent to: 17890 Midway Motel



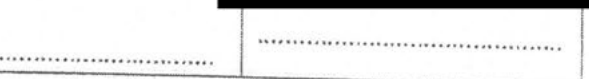
at: 293 Lenton Street Rotorua
 [Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:
Emergency Housing
 [Give Details]

My submission is:
I OPPOSE TO Contracted Emergency Housing - Land Use Consent
- Domestic Violence increase, Kids under 5 walking on Roads
- Rubbish spilled, Boy Races speedy up & down Side streets all 4 hours
 [include -
 whether you support or oppose the specific parts of the application or wish to have them amended; and
 the reasons for your views]

I seek the following decision from the consent authority:
Decline the Resource Consent application - Land use Consent
 [Give precise details, including the general nature of any conditions sought]

I wish / do not wish to be heard in support of my submission.
 * If others make a similar submission, I will consider presenting a joint case with them at a hearing.
 * [Delete if you would not consider presenting a joint case]


Signature to sign on		Date: <u>11-07-22</u>
Address		
Contact person: [name and designation, if applicable]		

FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991
(Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag R03029 ROTORUA	Name of Submitter: RONALD WILLIAM BEETHE  (Full Name)
---	--

Received
11 JUL 2022
Rotorua Lakes Council
Customer Centre

This is a submission on an application from:

Ronald William Beeth
(Name of applicant)

for a Resource Consent to:

17662 - Malones Spa Motel

at:

321 Tenter St Rotorua
[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

Emergency Housing
[Give Details]

My submission is:

In OPPOSE To Contracted Emergency Housing - Land Use Consent
- Additional Domestic Violence - Babies walking over streets
- Boy Racis Speedy up & down street all hours @ night - rubbish on street
[include -

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views]


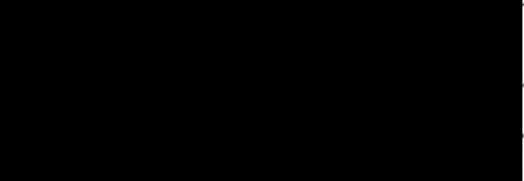

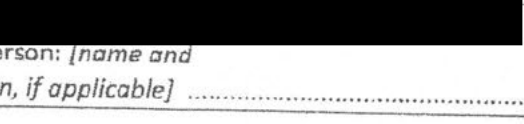
I seek the following decision from the consent authority:

Decline the Resource Consent application - Land use consent

[Give precise details, including the general nature of any conditions sought]

I wish / do not wish to be heard in support of my submission.

- * If others make a similar submission, I will consider presenting a joint case with them at a hearing.
- * [Delete if you would not consider presenting a joint case]

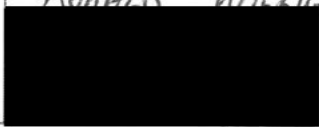
Signature to sign on		Date: <u>11-07-22</u>
Address for		Telephone: 
Contact person: [name and designation, if applicable]	

FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991
(Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag R03029 ROTORUA	Name of Submitter: Ronald William Beech  (Full Name)
---	---

Received
 11 JUL 2022
 Rotorua Lakes Council
 Customer Centre

This is a submission on an application from:

Ronald William Beech
(Name of applicant)

for a Resource Consent to: 17887 Ascot on Fenton

at: 247 Fenton St Rotorua & 12 Toko St Rotorua
[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

Emergency housing

[Give Details]

My submission is:

I oppose to Contracted Emergency Housing Land Use Consent
- Additional Domestic Violence - Small kids under 5 Ranig Busy Street
- Boy Racers up & down Streets - Rubbish over street.

[include -

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views]


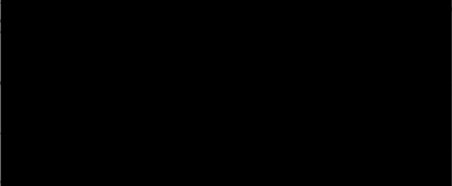
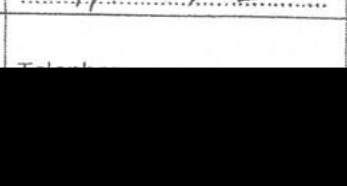
I seek the following decision from the consent authority:

Decline the Resource Consent application - Land use cons.

[Give precise details, including the general nature of any conditions sought]

I wish / do not wish to be heard in support of my submission.

- * If others make a similar submission, I will consider presenting a joint case with them at a hearing.
- * [Delete if you would not consider presenting a joint case]


Signature to sign on		Date: <u>11-07-22</u>
Address for		
Contact person: [name and designation, if applicable]	

FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991
(Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: Ronald William Beerr  (Full Name)
---	---

Received
11 JUL 2022
Rotorua Lakes Council
Customer Centre

This is a submission on an application from:

Ronald William Beerr
(Name of applicant)

for a Resource Consent to:

RC17647 - Lake Rotorua Motel

at:

131 Lake Road Rotorua

[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

Emergency Housing

[Give Details]

My submission is:

I OPPOSE TO Contracted Emergency Housing - Land Use Consent
- Additional Domestic Violence - Small Kids (under 5) roving street
- Bay Recess up & Down Street - People/Intruders on property

[include -

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views]


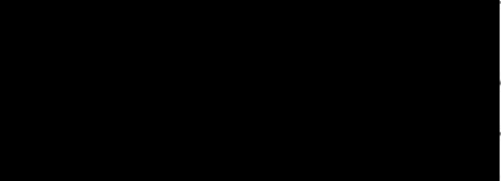
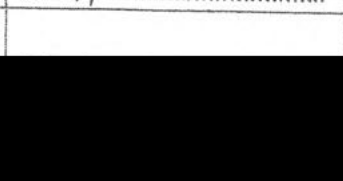
I seek the following decision from the consent authority:

Decline the Resource Consent application - Land use Consent

[Give precise details, including the general nature of any conditions sought]

I wish / do not wish to be heard in support of my submission.

- * If others make a similar submission, I will consider presenting a joint case with them at a hearing.
- * [Delete if you would not consider presenting a joint case]

Signature to sign on		Date: 11-07-22
Address for		
Contact person: [name and designation, if applicable]	Fax/email:	

FORM 13

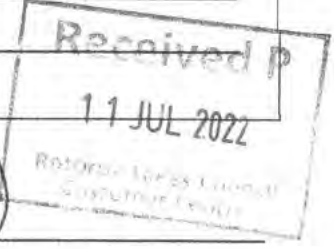
SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991 (Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA

Name of Submitter: David Alexander McPherson (Full Name)



This is a submission on an application from:

Tuapapa Kura Kaiinga (MHU) (Name of applicant)

for a Resource Consent to: Use a property for Contracted Emergency Housing with a term of five years.

at: Lake Rotorua Motel - 131 Lake Road [Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

- 1) The term of the consent
2) The provision of support services

[Give Details]

My submission is:

The term of the consent is far too long for what should be a temporary measure

The proposed provision of support services is inadequate [include - to avoid adverse effects on the local residential environment

- whether you support or oppose the specific parts of the application or wish to have them amended; and
the reasons for your views]

I seek the following decision from the consent authority:

Decline consent to the application

[Give precise details, including the general nature of any conditions sought]

I wish / do not wish to be heard in support of my submission.

* If others make a similar submission, I will consider presenting a joint case with them at a hearing.

* [Delete if you would not consider presenting a joint case]

Signature of submitter (or person authorised to sign on behalf of submitter): Date: 11 July 2022
Address for service of Submitter: Telephone:
Contact person: [name and designation, if applicable] Fax/email:

FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991
(Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: <u>David Alexander McPherson</u> (Full Name)
---	--

This is a submission on an application from:

Te Tuapapa Kura Kaiinga (MHU)
(Name of applicant)

for a Resource Consent to: Use a property for Contracted Emergency Housing with a term of five years.

at: Alpin Motel 16 Sala Street
[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

- 1) The term of the consent
- 2) The provision of support services

[Give Details]

My submission is:

The term of the consent is far too long for what should be a temporary measure

The proposed provision of support services is inadequate [include - to avoid adverse effects on the local residential environment

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views]

I seek the following decision from the consent authority:

Decline consent to the application

[Give precise details, including the general nature of any conditions sought]

I wish / ~~do not wish~~ to be heard in support of my submission.

* If others make a similar submission, I will consider presenting a joint case with them at a hearing.

* [Delete if you would not consider presenting a joint case]

Signature of submitter (or person authorised to sign on behalf of submitter): <u>DA McPherson</u>	Date: <u>11 July 2022</u>
Address for service of Submitter: 	Telephone: 
Contact person: [name and designation, if applicable]

FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991 (Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: <u>David Alexander McPherson</u> (Full Name)
---	--

This is a submission on an application from:

Te Tuapapa Kara Kaiinga (MHU)
(Name of applicant)

for a Resource Consent to: Use a property for Contracted Emergency Housing with a term of five years.

at: New Castle Motor Lodge - 18 Ward Avenue
[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

- 1) The term of the consent
- 2) The provision of support services

[Give Details]

My submission is:

The term of the consent is far too long for what should be a temporary measure

The proposed provision of support services is inadequate [include - to avoid adverse effects on the local residential environment,

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views]

I seek the following decision from the consent authority:

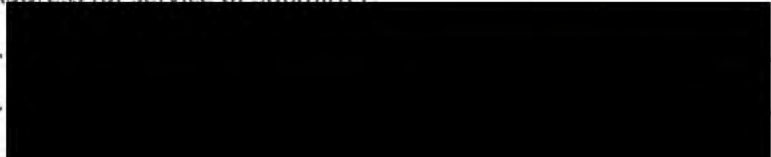

Decline consent to the application

[Give precise details, including the general nature of any conditions sought]

I wish / ~~do not wish~~ to be heard in support of my submission.

* If others make a similar submission, I will consider presenting a joint case with them at a hearing.

* [Delete if you would not consider presenting a joint case]

Signature of submitter (or person authorised to sign on behalf of submitter): <u>David McPherson</u>	Date: <u>11 July 2022</u>
Address for service of Submitter: 	Telephone: 
Co-designation, if applicable]	Fax/email:

FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991
(Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: <u>David Alexander McPherson</u> (Full Name)
---	--

This is a submission on an application from:

Te Tuapapa Kura Kainga (MHU)
(Name of applicant)

for a Resource Consent to: Use a property for Contracted Emergency Housing with a term of five years.

at: Malones Spa Motel - 321 Fenton Street
[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

- 1) The term of the consent
- 2) The provision of support services

[Give Details]

My submission is:

The term of the consent is far too long for what should be a temporary measure

The proposed provision of support services is inadequate [include - to avoid adverse effects on the local residential environment,

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views]

I seek the following decision from the consent authority:

Decline consent to the application

[Give precise details, including the general nature of any conditions sought]

I wish / ~~do not wish~~ to be heard in support of my submission.

* If others make a similar submission, I will consider presenting a joint case with them at a hearing.

* [Delete if you would not consider presenting a joint case]

Signature of submitter (or person authorised to sign on behalf of submitter): <u>David McPherson</u>	Date: <u>11 July 2012</u>
Address for service of Submitter:	Telephone:
Contact person: [name and designation, if applicable]	Fax/email:

FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991
(Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: <u>David Alexander Matherson</u> _____ _____ (Full Name)
---	--

This is a submission on an application from:

Te Tuapapa Kura Kainga (MHUP)
(Name of applicant)

for a Resource Consent to: Use a property for Contracted Emergency Housing with a term of five years.

at: Pohuta Lodge - 3 Meade Street
[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

- 1) The term of the consent
- 2) The provision of support services

[Give Details]

My submission is:

The term of the consent is far too long for what should be a temporary measure

The proposed provision of support services is inadequate [include - to avoid adverse effects on the local residential environment.

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views]

I seek the following decision from the consent authority:

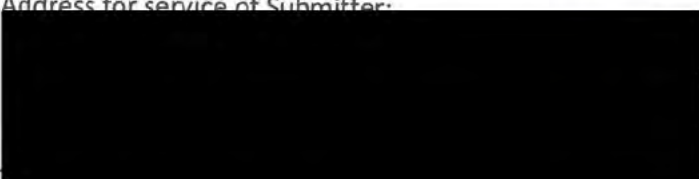

Decline consent to the application

[Give precise details, including the general nature of any conditions sought]

I wish / ~~do not wish~~ to be heard in support of my submission.

* If others make a similar submission, I will consider presenting a joint case with them at a hearing.

* [Delete if you would not consider presenting a joint case]

Signature of submitter (or person authorised to sign on behalf of submitter): <u>[Signature]</u>	Date: <u>11 July 2022</u>
Address for service of Submitter: 	Telephone: 
Contact person: [name and designation, if applicable]	Fax/email:

FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991
(Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: <u>David Alexander McPherson</u> (Full Name)
---	--

This is a submission on an application from:

Te Tuapapa Kura Kainga (MHU)
(Name of applicant)

for a Resource Consent to: Use a property for contracted Emergency Housing with a term of five years.

at: Union Victoria Motel - 26-28 Victoria St + 5 Union Street
[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

- 1) The term of the consent
- 2) The provision of support services

[Give Details]

My submission is:

The term of the consent is far too long for what should be a temporary measure

The proposed provision of support services is inadequate
[include - to avoid adverse effects on the local residential environment]

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views]


I seek the following decision from the consent authority:

Decline consent to the application

[Give precise details, including the general nature of any conditions sought]

I wish / ~~do not wish~~ to be heard in support of my submission.

- * If others make a similar submission, I will consider presenting a joint case with them at a hearing.
- * [Delete if you would not consider presenting a joint case]

Signature of submitter (or person authorised to sign on behalf of submitter): <u>David Alexander McPherson</u>	Date: <u>11 July 2022</u>
Address for service of Submitter: 	Telephone: 
Contact person: [name and designation, if applicable]	Fax/email:

FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991
(Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: <u>David Alexander McPherson</u> (Full Name)
---	--

This is a submission on an application from:

Te Tuapapa Kura Kainga (MHU)
(Name of applicant)

for a Resource Consent to: Use a property for Contracted Emergency Housing with a term of five years.

at: Ascot on Fenton - 247 Fenton Street and 12 Toko Street
[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

- 1) The term of the consent
- 2) The provision of support services

[Give Details]

My submission is:

The term of the consent is far too long for what should be a temporary measure

The proposed provision of support services is inadequate
[include - to avoid adverse effects on the local residential environment
▪ whether you support or oppose the specific parts of the application or wish to have them amended; and
▪ the reasons for your views]



I seek the following decision from the consent authority:

Decline consent to the application

[Give precise details, including the general nature of any conditions sought]

I wish / ~~do not wish~~ to be heard in support of my submission.

- * If others make a similar submission, I will consider presenting a joint case with them at a hearing.
- * [Delete if you would not consider presenting a joint case]

Signature of submitter (or person authorised to sign on behalf of submitter):	Date: <u>11 July 2022</u>
Address for service of Submitter: 	Telephone: 
Contact person: [name and designation, if applicable]	Fax/email:

FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991
(Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: <u>David Alexander McPherson</u> (Full Name)
---	--

This is a submission on an application from:

Te Tuapapa Kura Kainga (MHLD)
(Name of applicant)

for a Resource Consent to: Use a property for Contracted Emergency Housing with a term of five years.

at: Roto Vegas Motel - 249 Fenton Street and 16 Toko Street
[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

- 1) The term of the consent
- 2) The provision of support services

[Give Details]

My submission is:

The term of the consent is far too long for what should be a temporary measure

The proposed provision of support services is inadequate
[include - to avoid adverse effects on the local residential environment, whether you support or oppose the specific parts of the application or wish to have them amended; and the reasons for your views]

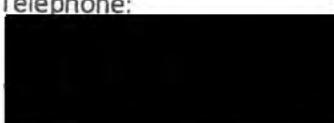
I seek the following decision from the consent authority:

Decline consent to the application

[Give precise details, including the general nature of any conditions sought]

I wish / ~~do not wish~~ to be heard in support of my submission.

- * If others make a similar submission, I will consider presenting a joint case with them at a hearing.
- * [Delete if you would not consider presenting a joint case]

Signature of submitter (or person authorised to sign on behalf of submitter): <u>David Alexander McPherson</u>	Date: <u>11 July 2022</u>
Address for service of Submitter:	Telephone: 
Contact person: [name and designation, if applicable]	Fax/email:

FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991
(Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: <u>David Alexander McPherson</u> (Full Name)
---	--

This is a submission on an application from:

Te Tuapapa Kura Kainga (MHU)
(Name of applicant)

for a Resource Consent to: Use a property for Contracted Emergency Housing with a term of five years.

at: Midway Motel - 293 Fenton Street
[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

- 1) The term of the consent
- 2) The provision of support services

[Give Details]

My submission is:

The term of the consent is far too long for what should be a temporary measure

The proposed provision of support services is inadequate
[include - to avoid adverse effects on the local residential environment.
▪ whether you support or oppose the specific parts of the application or wish to have them amended; and
▪ the reasons for your views]

I seek the following decision from the consent authority:

Decline consent to the application

[Give precise details, including the general nature of any conditions sought]

I wish / ~~do not wish~~ to be heard in support of my submission.

- * If others make a similar submission, I will consider presenting a joint case with them at a hearing.
- * [Delete if you would not consider presenting a joint case]

Signature of submitter (or person authorised to sign on behalf of submitter): <u>David Alexander McPherson</u>	Date: <u>11 July 2022</u>
Address for service of Submitter: 	Telephone: 
Contact person: [name and designation, if applicable]	Fax/email:

FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991
(Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: <u>David Alexander McPherson</u> (Full Name)
---	--

This is a submission on an application from:

Te Tuapapa Kura Kairua (MHUD)
(Name of applicant)

for a Resource Consent to: Use a property for Contracted Emergency Housing with a term of five years.

at: Beneva Motor Lodge - 299 Fenton Street
[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

- 1) The term of the consent
- 2) The provision of support services

[Give Details]

My submission is:

The term of the consent is far too long for what should be a temporary measure

The proposed provision of support services is inadequate [include - to avoid adverse effects on the local residential environment.

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views]

I seek the following decision from the consent authority:

Decline consent to the application

[Give precise details, including the general nature of any conditions sought]

I wish / ~~do not wish~~ to be heard in support of my submission.

* If others make a similar submission, I will consider presenting a joint case with them at a hearing.

* [Delete if you would not consider presenting a joint case]

Signature of submitter (or person authorised to sign on behalf of submitter): <u>David McPherson</u>	Date: <u>11 July 2022</u>
Address for service of Submitter: 	Telephone: 
Contact person: [name and designation, if applicable]	Fax/email:

FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991
(Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: <u>David Alexander McPherson</u> (Full Name)
---	--

This is a submission on an application from:

Tu Tuapapa Kura Kainga (MHUD)
(Name of applicant)

for a Resource Consent to: Use a property for Contracted Emergency Housing with a term of five years.

at: Ann's Volcanic Motel - 107 Maleny Road
[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

- 1) The term of the consent
- 2) The provision of support services

[Give Details]

My submission is:

The term of the consent is far too long for what should be a temporary measure

The proposed provision of support services is inadequate [include - to avoid adverse effects on the local residential environment.

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views]

I seek the following decision from the consent authority:

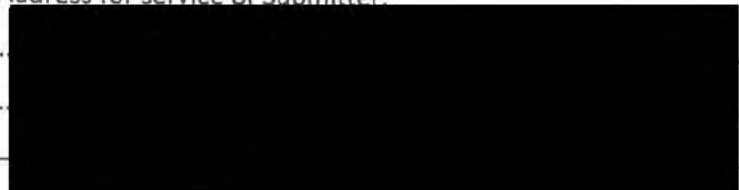
Decline consent to the application

[Give precise details, including the general nature of any conditions sought]

I wish / ~~do not wish~~ to be heard in support of my submission.

* If others make a similar submission, I will consider presenting a joint case with them at a hearing.

* [Delete if you would not consider presenting a joint case]

Signature of submitter (or person authorised to sign on behalf of submitter): <u>David McPherson</u>	Date: <u>11 July 2012</u>
Address for service of Submitter: 	Telephone: 
Contact person: [name and designation, if applicable]	Fax/email:

FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991 (Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: <u>David Alexander McPherson</u> (Full Name)
---	--

This is a submission on an application from:

Te Tuapapa Kura Kainga (MHU)
(Name of applicant)

for a Resource Consent to: Use a property for contracted Emergency Housing with a term of five years.

at: Apollo Hotel - 7 Troyon Street
[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

- 1) The term of the consent
- 2) The provision of support services

[Give Details]

My submission is:

The term of the consent is far too long for what should be a temporary measure

The proposed provision of support services is inadequate
[include - to avoid adverse effects on the local residential environment.
▪ whether you support or oppose the specific parts of the application or wish to have them amended; and
▪ the reasons for your views]

I seek the following decision from the consent authority:

Decline consent to the application

[Give precise details, including the general nature of any conditions sought]

I wish / ~~do not wish~~ to be heard in support of my submission.

- * If others make a similar submission, I will consider presenting a joint case with them at a hearing.
- * [Delete if you would not consider presenting a joint case]

Signature of submitter (or person authorised to sign on behalf of submitter): <u>David McPherson</u>	Date: <u>11 July 2022</u>
Address for service of Submitter: 	Telephone: 
Contact person: [name and designation, if applicable]	Fax/email:

FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991
(Rotorua Lakes Council is the operating name of Rotorua District Council)

To:
Chief Executive
Rotorua Lakes Council
Private Bag RO3029
ROTORUA

Name of Submitter:
David Alexander McPherson

(Full Name)



This is a submission on an application from:

Ministry of Housing and Urban Development
(Name of applicant)

for a Resource Consent to:

Use the existing site and motel buildings for contractual emergency housing

at: 284-286 Fenton Street

[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

(1) A five year consent term is grossly excessive for what should be only a temporary measure
(2) Provision of support services, (3) Number of occupants

[Give Details]

My submission is:

(1) A five year term is completely inappropriate
(2) The proposed support services are completely inadequate
(3) The large number of disadvantaged people in a limited environment is dangerous
(4) The adverse effects on both the local residential environment and the occupants are substantial and unacceptable

[include - residential environment and the occupants are substantial and unacceptable]

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views

I seek the following decision from the consent authority:

Decline consent to the application.

[Give precise details, including the general nature of any conditions sought]

I wish / ~~do not wish~~ to be heard in support of my submission.

* If others make a similar submission, I will consider presenting a joint case with them at a hearing.

* [Delete if you would not consider presenting a joint case]

Signature of submitter (or person authorised to sign on behalf of submitter): <u>David Alexander McPherson</u>	Date: <u>2-9-2022</u>
Address for service of Submitter: <u>Rotorua 3010</u>	Telephone:
Contact person: [name and designation, if applicable] <u>As above.</u>	Fax/email:

FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991 (Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: <u>Marnie Porter</u> <i>(Full Name)</i>
---	---

This is a submission on an application from:

Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development (MHUD)

(Name of applicant)

for a Resource Consent to: use various sites and existing buildings within those sites for Contracted Emergency Housing with a term of five years.

Ref: RC17847, RC17648, RC17650, RC17682, RC17861, RC17873, RC17887, RC17889, RC17890, RC17891, RC17892, RC17893

at: 131 Lake Rd, 16 Sala St, 18 Ward Ave, 321 Fenton St, 3 Meade St, 26-28 Victoria St & 5 Union St, 247 Fenton St & 12 Toko St, 249 Fenton St & 16 Toko St, 293 Fenton St, 299 Fenton St, 107 Maffroy Rd, and 7 Tyrone St Rotorua

[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

All parts of all twelve resource consent applications.

Received

[Give Details]

11 JUL 2022

My submission is:

See attached.

**Rotorua Lakes Council
Customer Centre**

The assessments included with the applications conclude that the effects are less than minor and the proposals are consistent with the objectives and policies of the Rotorua District Plan.

Resource consent can be granted in accordance with Sections 104 and 104B of the Resource Management Act 1991.

[include –

- *whether you support or oppose the specific parts of the application or wish to have them amended; and*
- *the reasons for your views]*

I seek the following decision from the consent authority:

Grant Resource Consent to all twelve applications subject to suggested conditions outlined in the applications.

[Give precise details, including the general nature of any conditions sought]

I wish / do not wish to be heard in support of my submission.

- * If others make a similar submission, I will consider presenting a joint case with them at a hearing.
- * *[Delete if you would not consider presenting a joint case]*

Signature of submitter (or person authorised to sign on behalf of submitter): <u>M. Porter</u>	Date: <u>08/07/22</u>
Address for service of Submitter:	Telephone:

Note to submitter:

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

The information you have provided on this form is required so that your submission can be processed under the RMA, and your name and address will be publicly available. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission. If you would like to request access to, or correction of your details, please contact the Council.

FORM 13 SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991
(Rotorua Lakes Council is the operating name of Rotorua District Council)

To:
Chief Executive
Rotorua Lakes Council
Private Bag RO3029
ROTORUA

Name of Submitter:
MONIKA JEAN MARRINER

(Full Name)

This is a submission on an application from:

MINISTRY OF HOUSING AND URBAN DEVELOPEMENT
(Name of applicant)

for a Resource Consent to: USE OF 12 MOTEL SITES AND EXISTING BUILDINGS FOR FIVE YEARS FOR CONTRACTED EMERGENCY HOUSING

at: PLEASE SEE ATTACHMENT NAMING THE 12 MOTELS
[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

ALL 12 MOTELS BEING GIVEN A 5 YEAR RESOURCE CONSENT TO OPERATE AS EMERGENCY HOUSING AND THE BLATANT DISREGARD OF OUR 10 YEAR PLAN REGARDING THE USE AND STAY OF MOTELS
[Give Details]

My submission is:
HAT NO GOVERNMENT / GOVT AGENCY (MSD, MHUD, DEPART. OF CORRECTIONS) HAS A RIGHT TO OVERRIDE THE CITIZENS WHO VOTED TO ADOPT OUR 10YR PLAN, PUT ITS RESIDENCE AT RISK AND ARE AFRAID TO LEAVE THEIR HOMES.

[include - THE SOCIAL BEHAVIOUR IN A ONCE BEAUTIFUL CITY, IS OUT OF CONTROL

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views]

I seek the following decision from the consent authority:

TO DECLINE RESOURCE CONSENT TO MHUD TO USE 12 ROTORUA MOTELS AS ERMERGENCY HOUSING FOR THE NEXT 5 YEARS

[Give precise details, including the general nature of any conditions sought]

I wish / ~~do not wish~~ to be heard in support of my submission.

- * If others make a similar submission, I will consider presenting a joint case with them at a hearing.
- * [Delete if you would not consider presenting a joint case]

Signature of submitter (or person authorised to sign on behalf of submitter): <u>M. Marriner</u>	Date: <u>10-07-2022</u>
Address for service of Submitter: [REDACTED]	Telephone: [REDACTED]
Contact person: [name and designation, if applicable] _____	Fax/email: [REDACTED]

Received

11 JUL 2022 12:40 PM

13 June 2022



Doc No: RDC-1268418
Enquiries to: **Bethany Bennie**

Civic Centre
1061 Haupapa Street
Private Bag 3029
Rotorua Mail Centre
Rotorua 3046
New Zealand

Dear Sir/Madam,

Publicly Notified Resource Consent Applications: Contracted Emergency Housing

Consent no:	RC17647 – LAKE ROTORUA MOTEL – 131 LAKE ROAD, ROTORUA; RC17648 – ALPIN MOTEL – 16 SALA STREET, ROTORUA; RC17650 – NEW CASTLE MOTOR LODGE – 18 WARD AVE, ROTORUA; RC17662 – MALONES SPA MOTEL – 321 FENTON STREET, ROTORUA; RC17661 – POHUTU LODGE – 3 MEADE STREET, ROTORUA; RC17673 – UNION VICTORIA MOTEL – 26-28 VICTORIA STREET & 5 UNION STREET, ROTORUA; RC17887 – ASCOT ON FENTON – 247 FENTON STREET AND 12 TOKO STREET, ROTORUA; RC17889 – ROTO VEGAS MOTEL – 249 FENTON ST AND 16 TOKO STREET, ROTORUA; RC17890 – MIDWAY MOTEL - 293 FENTON STREET, ROTORUA; RC17891 – GENEVA MOTOR LODGE – 299 FENTON STREET, ROTORUA; RC17892 – ANN'S VOLCANIC - 107 MALFROY ROAD, ROTORUA; AND RC17893 - APOLLO MOTEL – 7 TRYON STREET, ROTORUA
Type of application:	LAND USE CONSENT - NON COMPLYING
Applicant:	MINISTRY OF HOUSING & URBAN DEVELOPMENT
Proposal:	RESOURCE CONSENT TO USE THE EXISTING SITE AND MOTEL BUILDINGS FOR CONTRACTED EMERGENCY HOUSING

Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development (MHUD) has applied on behalf of the operators of the above accommodation providers, to Rotorua Lakes Council for twelve resource consents to use the sites and existing buildings for contracted emergency housing for five years.

The twelve applications have been publicly notified in the Rotorua Daily Post on Saturday 11 June 2022.

What is contracted emergency housing?

Contracted emergency housing is where MHUD contract specific motels to provide emergency accommodation for families/whānau with children, young people, and people with disabilities. It also can include kuia, kaumātua, and elderly individuals.

MHUD contract the whole motel for emergency housing. No other guests can stay at the motel while it is contracted by MHUD.

Wrap-around support services are provided for those staying in contracted emergency housing. This support is provided by a service provider, either Visions of a Helping Hand, Emerge Aotearoa or WERA Aotearoa. Support involves:

- Assessing the immediate needs of each whānau/family
- Working alongside the whānau/family during their stay to manage any issues related to their stay
- Assisting them in finding more permanent housing options.
- 24/7 on-site security and on-site social workers.

Making a submission

You can make a submission on any of the twelve resource consents.

You need to be clear on your submission as to which application you are submitting on. This means identifying the address of the application site you are submitting on.

If you decide to submit on some or all of the other contracted emergency housing applications you will need to fill out a separate submission for each application, identifying your reasons for your submission.

It is preferable that you use the submission form (Form 13). Copies of this form are available from the Rotorua Lakes Council, 1061 Haupapa Street, Rotorua, or on the Council website.

Once you have written your submission, please send it to the Rotorua Lakes Council, Private Bag 3029, Rotorua, or e-mail to planning.submissions@rotorualc.nz

Submissions close at 5.00pm on: **Monday 11 July 2022.**

As well as providing your submission to Council, a copy must be served on the applicant as soon as reasonably practicable. The applicants address for service is:

The Property Group Limited
Wellington Office
PO Box 2874 Wellington 6140

Attention: Alice Blackwell
ablackwell@propertygroup.co.nz

To view the full application, visit www.rotorualakescouncil.nz/contractedemergencyhousing . The application will be found under the Planning Guidance & Resource Consents section in 'Publicly Notified Resource Consents'. The complete public file is held at the Customer Services Centre of the Rotorua District Council, 1061 Haupapa Street, and may be inspected there during normal office hours.

If you have any queries regarding this letter please contact Bethany Bennie on (07) 9275748 or at Bethany.bennie@boffamiskell.co.nz

Yours faithfully,

Hannah Smith
Business Support Administrator

RFS 628799

FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991 (Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: <u>Stephen Pinkerton</u> _____ _____ (Full Name)
---	--

This is a submission on an application from:

Te Tūāpapa Kura Kāhinga - Ministry of Housing and Urban Development (MHUD)

(Name of applicant)

for a Resource Consent to: use various sites and existing buildings within those sites for Contracted Emergency Housing with a term of five years.

Ref: RC17647, RC17648, RC17650, RC17682, RC17681, RC17673, RC17687, RC17689, RC17690, RC17691, RC17692, RC17693

at: 131 Lake Rd, 16 Sala St, 18 Ward Ave, 321 Fenton St, 3 Meade St, 28-28 Victoria St & 3 Union St, 247 Fenton St & 12 Toko St, 249 Fenton St & 16 Toko St, 283 Fenton St, 290 Fenton St, 107 Malfroy Rd, and 7 Tyron St Rotorua

[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

All parts of all twelve resource consent applications.

[Give Details]

My submission is:

See attached.

The assessments included with the applications conclude that the effects are less than minor and the proposals are consistent with the objectives and policies of the Rotorua District Plan.

Resource consent can be granted in accordance with Sections 104 and 104B of the Resource Management Act 1991.

[include -

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views]

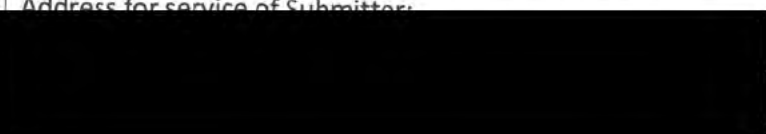
I seek the following decision from the consent authority:

Grant Resource Consent to all twelve applications subject to suggested conditions outlined in the applications.

[Give precise details, including the general nature of any conditions sought]

I wish / do not wish to be heard in support of my submission.

- * If others make a similar submission, I will consider presenting a joint case with them at a hearing.
- * [Delete if you would not consider presenting a joint case]

Signature of submitter (or person authorised to sign on behalf of submitter):	Date: <u>8-7-22</u>
Address for service of Submitter: 	Telephone:

Note to submitter:

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

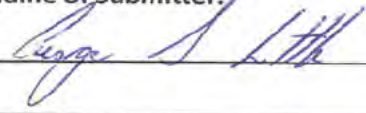
The information you have provided on this form is required so that your submission can be processed under the RMA, and your name and address will be publicly available. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission. If you would like to request access to, or correction of your details, please contact the Council.

FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991 (Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter:  _____ _____ (Full Name)
---	--

This is a submission on an application from:

Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development (MHUD)

(Name of applicant)

for a Resource Consent to: use various sites and existing buildings within those sites for Contracted Emergency Housing with a term of five years.

Ref: RC17647, RC17648, RC17650, RC17662, RC17661, RC17673, RC17687, RC17689, RC17690, RC17691, RC17692, RC17693

at: 131 Lake Rd, 16 Sala St, 18 Ward Ave, 221 Fenton St, 3 Meade St, 26-28 Victoria St & 5 Union St, 247 Fenton St & 12 Toko St, 249 Fenton St & 10 Toko St, 293 Fenton St, 299 Fenton St, 107 Maffroy Rd, and 7 Tyrone St Rotorua

[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

All parts of all twelve resource consent applications.

[Give Details]

My submission is:

See attached.

The assessments included with the applications conclude that the effects are less than minor and the proposals are consistent with the objectives and policies of the Rotorua District Plan.

Resource consent can be granted in accordance with Sections 104 and 104B of the Resource Management Act 1991.

[include –

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views]


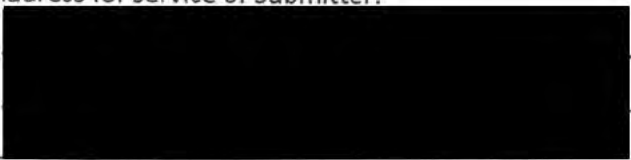
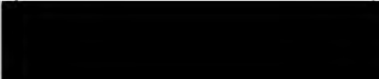
I seek the following decision from the consent authority:

Grant Resource Consent to all twelve applications subject to suggested conditions outlined in the applications.

[Give precise details, including the general nature of any conditions sought]

I wish / do not wish to be heard in support of my submission.

- * If others make a similar submission, I will consider presenting a joint case with them at a hearing.
- * [Delete if you would not consider presenting a joint case]

Signature of submitter (or person authorised to sign on behalf of submitter):	Date:  31/8/2022
Address for service of Submitter: 	Telephone: 

Note to submitter:

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

The information you have provided on this form is required so that your submission can be processed under the RMA, and your name and address will be publicly available. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission. If you would like to request access to, or correction of your details, please contact the Council.

FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991 (Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: <u>Ramona Thomas</u> _____ _____ (Full Name)
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This is a submission on an application from:

Te Tūāpapa Kura Kāinga - Ministry of Housing and Urban Development (MHUD)

(Name of applicant)

for a Resource Consent to: use various sites and existing buildings within those sites for Contracted Emergency Housing with a term of five years.

Ref: RC17647, RC17648, RC17650, RC17662, RC17661, RC17673, RC17687, RC17689, RC17690, RC17691, RC17692, RC17693

at: 131 Lake Rd, 16 Sala St 18 Ward Ave, 321 Fenton St, 3 Meade St, 26-28 Victoria St & 5 Union St 247 Fenton St & 12 Toko St, 249 Fenton St & 16 Toko St, 293 Fenton St, 299 Fenton St, 107 Malfroy Rd, and 7 Tyron St, Rotorua

[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

All parts of all twelve resource consent applications.

[Give Details]

My submission is:

See attached.

The assessments included with the applications conclude that the effects are less than minor and the proposals are consistent with the objectives and policies of the Rotorua District Plan.

Resource consent can be granted in accordance with Sections 104 and 104B of the Resource Management Act 1991.

[include -

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views]

I seek the following decision from the consent authority:

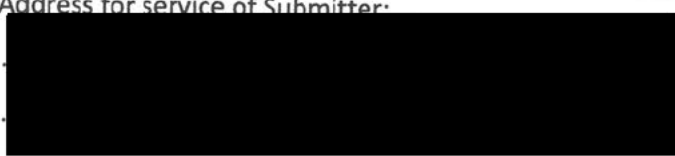

Grant Resource Consent to all twelve applications subject to suggested conditions outlined in the applications.

[Give precise details, including the general nature of any conditions sought]

I wish / do not wish to be heard in support of my submission.

* If others make a similar submission, I will consider presenting a joint case with them at a hearing.

* [Delete if you would not consider presenting a joint case]

Signature of submitter (or person authorised to sign on behalf of submitter):	Date: <u>7/7/22</u>
Address for service of Submitter: 	Telephone: 

Note to submitter:

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

The information you have provided on this form is required so that your submission can be processed under the RMA, and your name and address will be publicly available. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission. If you would like to request access to, or correction of your details, please contact the Council.

FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991 (Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: <u>SYLVIA TAHURIORANGI</u> _____ _____ (Full Name)
---	--

This is a submission on an application from:

Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development (MHUD)

(Name of applicant)

for a Resource Consent to: use various sites and existing buildings within those sites for Contracted Emergency Housing with a term of five years.

Ref: RC17647, RC17648, RC17650, RC17662, RC17661, RC17673, RC17687, RC17689, RC17690, RC17691, RC17692, RC17693

at: 131 Lake Rd, 16 Sala St, 18 Ward Ave, 321 Fenton St, 3 Meade St, 29-25 Victoria St & 5 Union St, 247 Fenton St & 12 Toko St, 249 Fenton St & 16 Toko St, 263 Fenton St, 299 Fenton St, 107 Malloy Rd, and 7 Tyron St, Rotorua

[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

All parts of all twelve resource consent applications.

[Give Details]

My submission is:

See attached.

The assessments included with the applications conclude that the effects are less than minor and the proposals are consistent with the objectives and policies of the Rotorua District Plan.

Resource consent can be granted in accordance with Sections 104 and 104B of the Resource Management Act 1991.

[include –

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views]

I seek the following decision from the consent authority:

Grant Resource Consent to all twelve applications subject to suggested conditions outlined in the applications.

[Give precise details, including the general nature of any conditions sought]

I wish / do not wish to be heard in support of my submission.

- * If others make a similar submission, I will consider presenting a joint case with them at a hearing.
- * [Delete if you would not consider presenting a joint case]

Signature of submitter (or person authorised to sign on behalf of submitter): _____ 	Date: <u>7/7/22</u>
Address for service of Submitter: _____ 	Telephone: _____ 

Note to submitter:

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

The information you have provided on this form is required so that your submission can be processed under the RMA, and your name and address will be publicly available. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission. If you would like to request access to, or correction of your details, please contact the Council.

FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991 (Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: <u>George Francis James Ray</u> _____ _____ (Full Name)
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This is a submission on an application from:

Te Tōāpapa Kura Kāinga – Ministry of Housing and Urban Development (MHUD)

(Name of applicant)

for a Resource Consent to: use various sites and existing buildings within those sites for Contracted Emergency Housing with a term of five years.

Ref: RC17847, RC17848, RC17850, RC17882, RC17881, RC17873, RC17887, RC17889, RC17890, RC17891, RC17892, RC17893

at: 131 Lake Rd, 16 Sala St, 18 Ward Ave, 321 Fenton St, 3 Meade St, 28-28 Victoria St & 5 Union St, 247 Fenton St & 12 Toko St, 249 Fenton St & 15 Toko St, 263 Fenton St, 299 Fenton St, 107 Malloy Rd, and 7 Tyron St, Rotorua

[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

All parts of all twelve resource consent applications.

[Give Details]

My submission is:

See attached.

The assessments included with the applications conclude that the effects are less than minor and the proposals are consistent with the objectives and policies of the Rotorua District Plan.

Resource consent can be granted in accordance with Sections 104 and 104B of the Resource Management Act 1991.

[include –

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views]

I seek the following decision from the consent authority:

Grant Resource Consent to all twelve applications subject to suggested conditions outlined in the applications.

[Give precise details, including the general nature of any conditions sought]

I wish / do not wish to be heard in support of my submission.

- * If others make a similar submission, I will consider presenting a joint case with them at a hearing.
- * [Delete if you would not consider presenting a joint case]

Signature of submitter (or person authorised to sign on behalf of submitter): <u>George</u>	Date: <u>8/6/22</u>
Address for service of Submitter:	Telephone:

Note to submitter:

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

The information you have provided on this form is required so that your submission can be processed under the RMA, and your name and address will be publicly available. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission. If you would like to request access to, or correction of your details, please contact the Council.

FORM 13

SUBMISSION ON A PUBLICLY OR LIMITED NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT



Section 96 Resource Management Act 1991

(Rotorua Lakes Council is the operating name of Rotorua District Council)

To: Chief Executive Rotorua Lakes Council Private Bag RO3029 ROTORUA	Name of Submitter: <u>Karina Symington</u> _____ (Full Name)
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This is a submission on an application from:

Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development (MHUD)

(Name of applicant)

for a Resource Consent to: use various sites and existing buildings within those sites for Contracted Emergency Housing with a term of five years.

Ref: RC17647, RC17648, RC17650, RC17662, RC17661, RC17673, RC17687, RC17689, RC17690, RC17691, RC17692, RC17693

at: 131 Lake Rd, 16 Sila St, 18 Ward Ave, 321 Fenton St, 3 Meade St, 26-28 Victoria St & 5 Union St, 247 Fenton St & 12 Toko St, 249 Fenton St & 16 Toko St, 243 Fenton St, 299 Fenton St, 107 Maitroy Rd, and 7 Tyron St Rotorua

[Briefly describe the type of consent, proposed activity, and location of the resource consent]

The specific parts of the application that my submission relates to are:

All parts of all twelve resource consent applications.

[Give Details]

My submission is:

See attached.

The assessments included with the applications conclude that the effects are less than minor and the proposals are consistent with the objectives and policies of the Rotorua District Plan.

Resource consent can be granted in accordance with Sections 104 and 104B of the Resource Management Act 1991.

[include –

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views]

I seek the following decision from the consent authority:



Grant Resource Consent to all twelve applications subject to suggested conditions outlined in the applications.

[Give precise details, including the general nature of any conditions sought]

I wish / do not wish to be heard in support of my submission.

* If others make a similar submission, I will consider presenting a joint case with them at a hearing.

* [Delete if you would not consider presenting a joint case]

Signature of submitter (or person authorised to sign on behalf of submitter): <u>Karina S</u>	Date: <u>8/7/2022</u>
Address for service of Submitter: 	Telephone: 

Note to submitter:

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

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