

Annexure 13: 7 Tryon Street (Apollo Hotel) – RC17893



Figure 1: 7 Tryon Street (as viewed from Tryon Street)

1 Introduction

1.1 Resource consent to use 7 Tryon Street for Contracted Emergency Housing (CEH) was lodged with Rotorua Lakes Council (RLC) on 20 December 2021. CEH is described in detail in the Application and in my Primary Evidence. To summarise, the proposal is to:

- (a) Use all 39 existing motel units for CEH, primarily for whānau with children and vulnerable individuals (such as elderly);
- (b) Provide on-site support services for CEH occupants by a dedicated Service Provider. The Service Provider is currently WERA Aotearoa Charitable Trust, but the Applicant would like to retain flexibility so that an alternative Service Provider could provide the necessary Support Services if required.
- (c) 24/7 security on-site, with roaming security between 9am – 5pm and on call as required;
- (d) Operate CEH from the site for a maximum of five years (from the date of the decision of the consent);
- (e) Revert back to a motel activity once the site is no longer being used for CEH.

2 Changes to the Application since lodgement

Maximum Occupancy

- 2.1 Since the notification of the Application, the Applicant has revised the total maximum occupancy onsite, reducing this from 117 occupants to **98 occupants**.
- 2.2 CEH has been operating from the 7 Tryon Street since 1 July 2021. On 11 May 2022, Ministry of Housing and Urban Development (MHUD) provided to RLC (in response to a s92 request) updated information about the actual number of occupants on the site. This information demonstrated that the number of occupants is far lower than the theoretical capacity (of 117 people) if every bed in every unit was occupied. Updated actual occupancy is provided in Table 1 below.

Table 1: 7 Tryon Street – Actual Occupancy Units (U) and People (P) December 2021 – August 2022

Date	15/12/21		7/02/22		30/03/22		27/04/22		23/05/22		30/06/22		1/08/22		30/08/22	
	U	P	U	P	U	P	U	P	U	P	U	P	U	P	U	P
No.	39	56	33	67	26	60	33	62	39	73	39	75	35	59	36	61

NB: All 39 units are contracted for CEH and 7 Tryon Street has a maximum theoretical capacity of 117 CEH occupants.

- 2.3 The reality of CEH is that units are allocated to whānau based on their specific needs, and this does not necessarily mean every bed in every unit is occupied. As demonstrated in Table 1 above, the actual number of people onsite has varied between 56 and 75 people. While these levels are notably lower than the maximum occupancy of 98 persons that is now being sought by the Applicant, it is my understanding that reasons for low levels of occupation can vary – for example, on occasion, rooms are decommissioned for maintenance and repairs between whānau stays, and some rooms are set aside for emergency placements.
- 2.4 It is accepted that those staying in CEH are generally onsite longer than typical motel guests. As such, in terms of the potential intensity of use I consider that a reduced maximum occupancy is appropriate and helps to mitigate the potential effects that could result from overcrowding.

3 Activity Status

Operative Rotorua District Plan

- 3.1 The subject site is located primarily within the Commercial 3 Zone, which adjoins the site to the north and south. The land to the east and west of the site is zoned Commercial 4.
- 3.2 As discussed in my Primary Evidence, the activity has been assessed as a Non-Complying Activity pursuant to Rule COMZ-R1.

4 Site Specific Matters raised in Submissions

- 4.1 The site specific s42A report by Ms Bennie provides an overview of the notification process and submissions raised. I note that many submitters made 'blanket' submissions which related to all Applications. As such, where the issues raised in submissions are relevant to all Applications, I have considered these issues in my Primary Evidence.
- 4.2 There were 313 submissions in relation to the resource consent at 7 Tryon Street for CEH (including 16 submissions that were provided to the IHP prior to notification of the application). Ten submissions are not considered blanket submissions and were more specific to 7 Tryon Street. One submission is in support, and the remaining nine are in opposition of the Proposal. One submitter is the adjacent hotel, four submitters are owners or operators of businesses in the surrounding area¹, three are associated with Whakarewarea Village and two are local residents.
- 4.3 The issues raised by submissions can be broadly categorised as follows:
- (a) Social Effects
 - (b) Tourism Effects
 - (c) Economic Effects
 - (d) Cumulative Effects
 - (e) External Amenity Effects
 - (f) Internal Amenity Effects

¹ Businesses include an art gallery (with attached residential apartment), childcare centres, and a law firm.

(g) Cultural Effects

(h) RMA matters

4.4 Submissions relating to social effects, tourism effects and economic effects have been addressed in my Primary Evidence and that of MHUD's experts. In this regard, it is noted that many of the site-specific submitters raise concerns over perceived anti-social behaviour and effects of CEH on business and tourism. No further discussion will be undertaken regarding these issues here.

4.5 Cumulative and cultural effects have also been discussed in my Primary Evidence; however, I provide additional comments specific to the site at 7 Tryon Street in my effects assessment below.

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

4.7 With regard to RMA matters, one submitter considers the Proposal inconsistent with the District Plan and higher-level planning documents, that the effects assessment undertaken in the application is not adequate, and that the Proposal does not meet the gateway test. All of these matters are addressed either in my Primary Evidence or the discussion below.

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

5 Assessment of Effects

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

(a) Positive effects

(b) Cultural Effects

(c) Character and amenity effects

(i) External amenity

(ii) Internal amenity

(d) Transportation Effects

- (i) Parking and access
- (ii) Traffic generation
- (e) Noise Effects
 - (i) Reverse sensitivity effects
 - (ii) Noise from emergency housing
- (f) Infrastructure effects
- (g) Financial contributions

Positive effects

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

Cultural effects

- 5.3 Apollo Hotel is located in proximity to the Te Whakarewarewa Geothermal Valley, on the edge of Rotorua. Whakarewarewa Village is located to the south of the site. Whakarewarewa is recognised in the District Plan as being an “exceptional” and “unique” place of cultural and historic significance². Submissions have been received from residents of Whakarewarewa Village, citing concerns around the antisocial behaviour of residents within CEH.

- 5.4 In terms of onsite operations, it is my understanding that Wera, the site’s onsite Service Provider, undertakes the following with respect to the Whakarewarea Village and mitigating potential effects:

- (a) Wera’s triaging process includes identifying affiliation to Tuhourangi Iwi and places priority on whānau that whakapapa to Tuhourangi Iwi. Approximately 10% of occupants at Apollo Hotel whānau affiliate to Tuhourangi. Te Arawa and neighbouring Iwi are also given priority in terms of living at Apollo Hotel;
- (b) The Lead Support Worker (Wera) whakapapa to Tuhourangi, and was raised in Whakarewarewa village;

² Part 3 Area-Specific Matters, Zones, RESZ, Issues.

- (c) Wera maintains a risk register that has demonstrated a significant reduction in the number of incidents around the Whakarewarewa Village;
- (d) Whakarewarewa Village members are invited to, and have attended, the regular Apollo Hotel Village hui and Whakarewarewa villagers have attended barbeques at the Apollo Hotel village;
- (e) Wera have had several visits, including tours, to Whakarewarewa to educate whānau on the dangers, risks, safety and kua (rules including respect) in play at Whakarewarewa;
- (f) The Apollo Hotel has posters promoting Whakarewarewa Village, its mana, history and kua;
- (g) Apollo Hotel villagers are regularly invited to participate in Whakarewarewa village's concert group, providing employment opportunities for those that are willing and capable.

5.5 Using their skills and experience, the onsite Service Provider has already implemented a number of measures (as outlined above) to promote awareness and build respect and knowledge in relation to the Whakarewarewa Village.

5.6 Notwithstanding the above, I agree with Ms Bennie's assessment in the s42A report that to better understand potential cultural effects it would be helpful to hear further from submitters in this regard. I note that the Applicant is interested to better understand their concerns to determine if there are further appropriate mitigation measures that can be undertaken.

5.7 Based on the information available to me, I am of the opinion that suitable conditions of consent can be applied that will mitigate the potential cultural effects resulting from the use of the site for CEH purposes. I anticipate that such conditions will be further developed through the hearings process.

Character and amenity effects

External Amenity - Streetscape / neighbourhood character

5.8 No changes are proposed in relation to the buildings and the AEE relevant to the site remains valid in this regard. The subject site accommodates an existing motel building and site, which has operated from the site since the 1970s.

- 5.9 The relevant COMZ3 zoning anticipates small convenience-based stores and commercial services, which would typically serve the immediately surrounding residential community. Although the subject site differs from the referenced character and amenity outcomes attributed to the zone, the existing character as established through the existing buildings and landscaping is consistent with the consented and legally established environment of an accommodation activity (lawfully established in the 1970s).
- 5.10 As noted in Ms Bennie's s42A report, the site is generally well kept, with no items residential in nature being clearly visible from the street. The existing planting along the boundary with 12 Meade Street requires some maintenance but otherwise provides good screening to adjacent sites. Ms Bennie has recommended conditions of consent to enhance the site's interface with the public realm, being the removal of motel related signage, and measures to ensure that existing landscaping will be maintained and replaced where necessary. I agree that such measures are appropriate to maintain a positive interface with, and appearance from, the street.
- 5.11 Overall I agree with Ms Bennie's conclusion that subject to existing external boundary treatments and landscaping features being properly maintained, the resulting landscape and visual effects are acceptable.
- 5.12 In addition to the above, a number of experts of the Council and MHUD have recommended that all online advertising and websites that promote tourist accommodation and other services should be removed. I agree that such measures are generally appropriate.
- 5.13 Overall, it is my opinion that the external amenity effects arising from the use of the site for CEH purposes are acceptable.

External Amenity – Cumulative effects

- 5.14 Cumulative effects of 13 resource consents being considered concurrently is discussed in my Primary Evidence. This was also addressed in the s92 response, the Social Impact Assessment, and in the Evidence of Ms Healy and Mr Eaquab.
- 5.15 Specific to the site at 7 Tryon Street, I note that there are no other CEH facilities or providers of EH-SNG accommodation adjoining the site. As identified in Figure 2 of the site specific s42A report, a tourist

accommodation site is directly east of the site, and this site is not known to provide emergency housing of any description. The onsite activities will be confined within the site and onsite management will minimise external effects. In my opinion, the use of the motel for CEH purposes will not significantly contribute to cumulative effects.

- 5.16 The proposed removal of motel signage will assist in reducing any ambiguity around the nature of onsite activities, and will help the site integrate more into the environment in which it is located.
- 5.17 My conclusion in relation to cumulative effects in my Primary Evidence are equally applicable here. Cumulative effects of the proposal are considered to be acceptable and with the implementation of proposed management and mitigation measures, are considered to be no more than minor.

Internal Amenity

- 5.18 Internal amenity relates to the quality of the onsite living environment for those staying in CEH, including access to onsite amenities typically associated with domestic living, open space and onsite services.
- 5.19 My Primary Evidence discusses how individuals are allocated to particular units, which among other matters, includes consideration of a unit's size, location, and onsite amenities to suit the requirements of the whānau or individual being homed.
- 5.20 Residents within CEH are accommodated on a relatively short-term basis (when compared with more permanent housing), with the length of stay varying between whānau groups. It is acknowledged, however, that the duration of stay is for a longer period than individuals who previously utilised the accommodation as motel guests. The provision of a quality and safe living environment is an important objective of CEH.
- 5.21 In undertaking this effects assessment, I also draw on the guiding principles within the relevant planning provisions applicable to the Commercial 3 Zone. The COMZ3 zone requires a minimum of 10m² (with a minimum depth of 2m) of outdoor open space to be provided per household unit³. This provides a helpful starting point in which to consider adequacy of open space; however, this must also be considered in the context that this

³ COMZ-S5.

standard is particularly applicable to site development resulting in permanent places of residence, as opposed to repurposed accommodation that instead serves as a temporary place of residence to the occupants.

Internal Amenity – Outdoor living space

- 5.22 Access to onsite amenity is one element that can contribute to a high-quality living environment. In my opinion, the extent and quality of the onsite amenity (including provision of open space) must be considered within the context of CEH providing a short-term place of residence for members of the community who otherwise have no tenable or better alternative accommodation.
- 5.23 The s42A report identifies that most units provide on site living space similar to what is anticipated in the zone. Further, the ground floor units have direct access to the shared outdoor living space. I agree with the s42A in that the outdoor living space are acceptable for CEH.
- 5.24 Further, in my opinion any reduction in the provision of outdoor space from what is required under the District Plan for standard residential housing is mitigated by the temporary nature of the residential accommodation.

Internal Amenity – Suitability for children

- 5.25 The application site has a pool, outdoor space, and a games room. I agree that there is potential to improve play space within the site, whether this be establishing a play space in the carpark area or utilising some of the outdoor space within the site.
- 5.26 The s42A report, informed by Ms Collins's assessment, recommends restrictions on the use of units to accommodate whānau with children, or certain age-groups from particular units. In my opinion, such restrictions, while well intended, are misplaced in the context of a community experiencing a significant housing crisis. I acknowledge the evidence that access to play space and more extensive physical living environments are contributors to a child's wellbeing and can aid in a child's developmental process. However, I consider access to a warm, safe, and stable accommodation are overriding factors to achieving the same essential outcomes. In my opinion, restricting whānau with children from occupying studio units, or limiting children of certain age groups from particular units, is likely to result in perverse outcomes, which ultimately would translate to whānau being unable to access CEH accommodation. In forming this

conclusion, I note that the wellbeing of tamariki (through the process of undertaking an individual needs based assessment of each whānau) is at the forefront in any decision making around placement into suitable living environments.

- 5.27 Overall, it is my opinion that the site is adequately suited to accommodating children. Accordingly, I do not support condition 8 in the s42A report.

Occupancy rate

- 5.28 Ms Bennie recommends that the proposed maximum occupancy rate for the site be restricted to 89 occupants. Maximum occupancy rates per unit type (excluding children under the age of six months) are also recommended. These recommendations are carried through to conditions 7-10 of the s42A report. The proposed limits on occupancy rates attempts to mitigate concerns of overcrowding and is based on the Canadian National Occupancy Standard (CNOS) used by Statistics New Zealand.
- 5.29 My Primary Evidence discusses why the CNOS is not appropriate as applied to CEH. In my opinion, the service provider is best placed to determine which rooms are most suitable for occupants, and they consider a multitude of factors including family dynamics.
- 5.30 Considering first the occupancy levels of the wider site, as noted in the s42A report, the Applicant has offered a reduction in the maximum occupancy numbers to a **maximum of 98 occupants**, which is an additional 9 people above that recommended by Council's s42A report. Informed by the advice of the service providers and Mr Wilson, I support the maximum level of 98 persons, and consider that it is appropriate to enable additional flexibility over and above what is proposed by the Council, in recognition that on occasion, the placement of whānau groups may require some occasional exceedance to the more restrictive operating limit proposed in the Council's conditions.
- 5.31 As noted above, I do not agree that it is necessary to limit the individual occupancy levels of specific units, or apply restrictions to accommodate young children. In my opinion, while such restrictions are well-intended, I do not consider that these are necessary to achieve the worthy objective of avoiding overcrowding. The Service Providers are skilled at ensuring the wellbeing of whānau and tamariki are at the forefront of determining appropriate allocation of accommodation.

5.32 Ms Bennie identifies that should the Panel be of the mind to grant consent and impose the occupancy conditions stated in the s42A report, some families may currently be accommodated in units that would no longer meet the recommended occupancy rates. If this is the case, it is requested that the options presented in paragraph 92 of the s42A report also be imposed. This will ensure that those currently occupying the site are able to retain their place of accommodation until a suitable long-term option is found.

CPTED principles

5.33 The overview s42A report briefly notes that it would be helpful to better understand the application of the National Guidelines for Crime Prevention through Environmental Design (CPTED) in the context of each site. Such an assessment has not yet been undertaken; however, a condition of consent requiring a CPTED audit be undertaken based on the principles of CPTED could be imposed in the decision of this consent if the Panel considered this was necessary. In my opinion, any recommendations of a subsequent CPTED audit could then inform a site-specific action and implementation plan that can be incorporated into the Site Management Plan.

Transportation Effects

5.34 I agree with and accept the s42A analysis with regard to transportation effects and the inclusion of Conditions 22 to 26.

Noise Effects

5.35 I agree with and accept the s42A analysis with regard to noise effects, including reverse sensitivity and noise from emergency housing. As outlined in my Primary Evidence, I do not agree with including permitted activity standards as conditions (i.e. s42A report site specific Condition 25 to 27).

Effects on Infrastructure

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

Financial contributions

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

6 Relevant Planning Framework

6.1 The higher order planning framework is discussed in my Primary Evidence. Below I will discuss the ODP in the context of 7 Tryon Street where there are particular matters that are distinct from my assessment in my Primary Evidence.

6.2 *Operative District Plan (ODP) Zone and CEH*

6.3 The site is located entirely within the Commercial 3 Zone (COMZ3 Zone). The Commercial 3 zone is described in the ODP as:

“Small clusters of convenience stores such as dairies, chemists, hairdressers and takeaway outlets that provide day to day services to residential areas located within the immediate vicinity. These centres are dispersed throughout the residential zones and are normally located on corner sites. Buildings are no more than 300m² in ground floor area and are usually no more than one storey in height. These areas have lower pedestrian and traffic movement compared to other commercial centres, however they provide an active environment, with higher levels of lighting and traffic movement in comparison to the surrounding residential environment.”

6.4 Being a well-established motel site, with a three-storey building, the existing built form does not readily align with the zone description. However, this is readily reconciled when considering the site and building has lawfully operated as a motel since the 1970s. Beyond this matter, I note that the use of the site for CEH will result in a more active environment than traditional residential accommodation but less active than commercial centres, which can be considered to accord with the zone description.

6.5 The ODP zone rules provide for household units as permitted activities in the Commercial 3 zone where these are not located on the ground floor. This suggests that buildings that are more one storey, while not common in the zone, are not discouraged. Specific to this site, the ground floor contains support services and site operations, rather than accommodation units which are generally located on levels 2 and 3.

6.6 There are no modifications proposed to the buildings or structures themselves that will be visible in the public realm, except removal of motel

signage. Outdoor amenity spaces are located internal to the site with no residential activities visible from the street.

- 6.7 As discussed elsewhere, the Proposal includes the reversion back to traditional ‘tourist accommodation⁴’ in the future (which will likely include reinstatement of motel signage).

Commercial Zone Objectives and Policies

- 6.8 **COMZ-O1** and supporting policy **COMZ-P3** provide a framework for neighbourhood centres that provide for the day to day needs of the surrounding residential area. I acknowledge that the use of the site for CEH does not support the day to day needs of the surrounding residential area in the context of convenience based commercial services, however the same applies in the context of site accommodating a well-established consented tourist facility.
- 6.9 While the CEH activity does not provide a convenience-based commercial service to the community, the Proposal provides for an alternative form of need in the community – by providing temporary supported accommodation for members of the community during a period in which there is an acute need for housing. The context has clearly changed in the last 5-10 years and as a result “housing is one of the biggest issues facing the Rotorua community⁵”.
- 6.10 Furthermore, the Motel Operator advises that CEH has enabled a long-established tourism business to survive in the unique and challenge context of operating under the impact of COVID-19.
- 6.11 Ultimately, when reconciling alignment with these provisions, I consider that the use of the site for CEH purposes is acceptable, particularly when considered against the backdrop of the site having accommodated a long-standing similar land use activity, which also did not provide day-to-day services to the surrounding residential catchment. I also note and agree with Ms Bennie’s observation that it is unclear why the site is actually zoned COMZ3, when the onsite activities have not accorded with the direction of the zone for over 40 years (and pre-date the ODP zone framework). I therefore conclude that while there are inconsistencies with these

⁴ ODP definition of ‘Tourist accommodation’ (page 35 Part 1 of ODP).

⁵ See RLC Submission on the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill, page 2.

provisions, this is not a determinative factor in my overall assessment or conclusions as to the appropriateness of the activity operating from the site.

6.12 **Objectives COMZ-O2 and COMZ-O3** address design and appearance of buildings. Relevant supporting policies are **COMZ-P6** and **COMZ-P7**. I generally agree with the assessment undertaken by Ms Bennie in regard to these objectives and policies.

6.13 In particular, I agree with Ms Bennie that maintaining the existing landscaping and fencing together with the removal of motel signage and site upkeep will contribute to an attractive streetscape.

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

6.15 *District Wide Objectives and Policies*

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

- (a) Noise: NOISE-O1 and NOISE-P4
- (b) Infrastructure: EIT-O3 and EIT-P14
- (c) Transport: EIT-O7, EIT-P18 and EIT-P22
- (d) Reverse Sensitivity: EIT-P23

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

Objectives and policies conclusion

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

7 Response to s42A Report's Recommended Conditions of Consent

7.1 Appendix 1 of the site specific s42A Report for 7 Tryon Street contains draft conditions of consent recommended by Ms Bennie. There is broad agreement around the majority of proposed conditions. The discussion below focuses more specifically upon conditions where I suggest changes

or explicitly disagree with those recommended in the s42A report. The Strategic Conditions in the overview s42A report have been discussed in my Primary Evidence.

- 7.2 An updated set of proposed consent conditions will be provided at the commencement of the hearing, and it is anticipated that these will develop over the course of the hearing. In the meantime, I provide the following overall comments on the recommended consent conditions attached to the Council's s42A site specific report.
- 7.3 **Conditions 2 and 3** identify the consent holder as the Operator and MHUD and restrict the consent from being transferred to and held by any other person. I do not agree with this restriction and have addressed this in my Primary Evidence.
- 7.4 **Condition 7** restricts site occupancy to a maximum of 89 persons (excluding children under six months of age). For the reasons outlined in Section 5 above it is my opinion that the maximum occupancy sought by the Applicant (98 persons) is acceptable. Ultimately, I consider that the Service Provider is best placed to determine which rooms are most suitable for occupants, and they consider a variety of factors including family dynamics.
- 7.5 **Conditions 8-10** limit the placement of children (in the case of Condition 8, restrict the accommodation of young children under the age of 7 from any second-floor unit in entirety) and specify maximum occupancy levels (excluding children under six months of age). I do not support the placement of these conditions and recommend their deletion.
- 7.6 **Condition 10** provides clarification that the occupancy levels do not limit the length of stay for residents accommodated in the units, and also does not limit the number of people residing in Manager's Accommodation. I recommend that this is instead reframed as an Advice Note under the condition controlling the maximum site occupancy (condition 7). Further to this, if the panel is of the mind to grant consent and impose the maximum number of occupants as stated in the s42A report, it is requested that the options presented in paragraph 92 of the s42A report also be imposed. This will ensure that those currently occupying the site are able to retain their place of accommodation until a suitable long-term option is found.

- 7.7 **Conditions 13 to 17** relate to retention/enhancement of landscaping, and improvements to open space areas throughout the site. I agree with the placement of these conditions.
- 7.8 **Condition 18** requires that physical motel signage be removed for the duration of the consent. I agree that this is reasonable.
- 7.9 **Condition 19** requires that all online advertising and websites that promote tourist accommodation and other services be removed. The implementation of this condition is difficult due to the nature of online advertising. Notwithstanding this, it is reasonable to require the Motel Operator to amend their website and booking websites to show no room availability and on this basis I agree that a condition to this effect is reasonable.
- 7.10 **Conditions 25 to 28** require compliance with the permitted activity performance standards for noise and light emissions from the site. I do not consider placement of conditions, that simply replicate permitted activity standards, to be in accordance with good practice, and nor do I consider their placement necessary. I recommend deletion of these conditions.
- 7.11 **Conditions 31 to 35** relate to the taking of a bond. This matter has been discussed within my Primary Evidence, where I dispute the need for a bond, and also the value of the individual bond. I recommend deletion of these conditions.

8 Section 104D Gateway Test and Part 2 Analysis

- 8.1 As discussed in my Primary Evidence, it is my opinion that the effects of the Proposal are no more than minor and the Proposal is not contrary to the objectives and policies of the Rotorua District Plan or Plan Change 9.
- 8.2 As detailed in my Primary Evidence, the Proposal aligns with Part 2 of the Act.

Date: 5 October 2022

AJ Blackwell

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Alice Blackwell