

Submission Summary

Contracted Emergency Housing

Lake Rotorua Hotel - RC17647
Alpin Motel - RC17648
New Castle Motor Lodge - RC17650
Pohutu Lodge Motel - RC17661
Malones Motel - RC17662
Union Victoria Motel - RC17673
Ascot on Fenton - RC17887
RotoVegas Motel - RC17889
Midway Motel - RC17890
Geneva Motor Lodge - RC17891
Ann's Volcanic Rotorua Motel - RC17892
Apollo Hotel - RC17893
Emerald Spa – RC18244

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1.0 Overview

The purpose of this report is to provide submitters and other relevant parties with an overview of the issues raised in submissions across all 13 resource consent applications for contracted emergency housing (the applications).

The Ministry of Housing and Urban Development (MHUD) requested that 12 of the applications be publicly notified on the 11th May 2022. These applications were publicly notified on 11th June 2022. Following this, a thirteenth application for contracted emergency housing (Emerald Spa) was submitted to Rotorua Lakes Council (Council) on the 22nd July 2022. This application was notified on the 6th August 2022. Due to Emerald Spa being notified at a separate date, it received fewer submissions than the remaining 12 applications.

In overview:

- Council received **3841** submissions from **350** submitters.
- Across all 13 applications there were **279** submitters opposing, **4** submitters opposing in part, and **69** submitters supporting¹.
- **140** submitters wish to be heard at the hearings.
- **302** submitters submitted on at least 12 applications and **25** submitters submitted on just one application.
- **88** submissions were received on Emerald Spa.
- **21** submitters outlined conditions or changes they would like to see if the applications were granted consent.
- There were **64** late submissions. These late submissions have been accepted by the Independent Hearings Panel².

As the submissions raised similar issues, a collective approach to the submission analysis has been undertaken. Collective analysis of the submissions provides an understanding of the key themes raised. Quotes from individual submissions are included in the report to assist in understanding the theme or issue.

For submitters who submitted on a specific application, an analysis of their submissions is provided in the s42a report for that application.

The five themes most frequently raised in submissions were:

- Behaviour of emergency housing tenants
- Neighbourhood safety
- Crime
- Adverse effects on the tourism sector, and
- Adverse effects on the amenity/reputation of Rotorua.

¹ Two submitters opposed some of the applications but supported others.

² Resource Management Act 1991, Minute #9 – Various, Independent Hearing Panel. 5th August 2022.

It was apparent through the submissions that many submitters do not distinguish between the 13 contracted emergency housing providers and other motels being used for emergency housing by MSD clients. A number of submitters also referred to MSD motels in their submission.

Throughout this report the term 'emergency housing' includes both emergency housing (motels accepting MSD clients with no wrap-around support services) and contracted emergency housing (CEH).

1.1 Methodology of analysis

A spreadsheet was prepared to analysis the data from the submissions. The spreadsheet has captured the following information:

- Submitter identification
- Motel identification
- Derived location
- Themes/issues
- Relief sought
- MSD motel
- Key words and quotes

Derived Location

Several submitters are landlords or agents submitting on behalf of an organisation or group. The address for service associated with these submissions is sometimes not the property or properties affected by the applications. It is acknowledged that anyone can submit on a publicly notified submission, regardless of the location however, it was useful to be able to map the location of the submitters in comparison to the application sites and against certain themes to better identify spatial relationships.

The 'derived location' is, a location identified by the submitter as being affected by an application site(s), if not their usual place of residence.

Themes

The analysis table has forty themes. These themes are grouped into broader categories such as 'Social', Economic', and 'Character and Amenity'. When identifying themes and the broader categories, consistency with the language used in the Rotorua District Plan issues, objectives and policies was used where possible. Some of the themes are interrelated and, in some cases, overlap, for example, the 'behaviour of tenants', the 'appearance of motels' and 'adverse external amenity effects' often contribute to 'adverse effects on the amenity/reputation of Rotorua'.

Relief Sought

The purpose of this group of categories was to capture any secondary relief sought by submitters. Some submitters opposing the applications offered preferred conditions of consent or modifications to the proposals if consent were to be granted. The submitters primary relief was identified, then any secondary relief also identified.

MSD Motel

Some submissions refer to issues with motels that are not contracted by MHUD. This data has been captured in the table through this category.

Key Words and Quotes

These categories were set up to capture patterns in the submissions and the language of submitters. Many submitters used similar language when describing their experiences, so key words have been recorded. Quotes have been captured to be used in reporting.

Frequency of submission themes

The below graph displays the fifteen most frequently raised submission themes from the submitter spreadsheet. From this graph it is clear that social effects from emergency housing (behaviour, crime and safety) are the predominant concern for most submitters.

Restore Rotorua Incorporated (RRI) submissions

A number of individuals (part of RRI) filed statements in December 2021 requesting Council to publicly notify the six applications that had been lodged. After the submissions were publicly notified, legal counsel for RRI confirmed some of these individuals wished for their evidence to be considered as a submission on all 13 applications. Those individuals who did not wish for their submission to be considered have been “greyed out” within the submission table. A number of these individuals did make a separate formal submission.

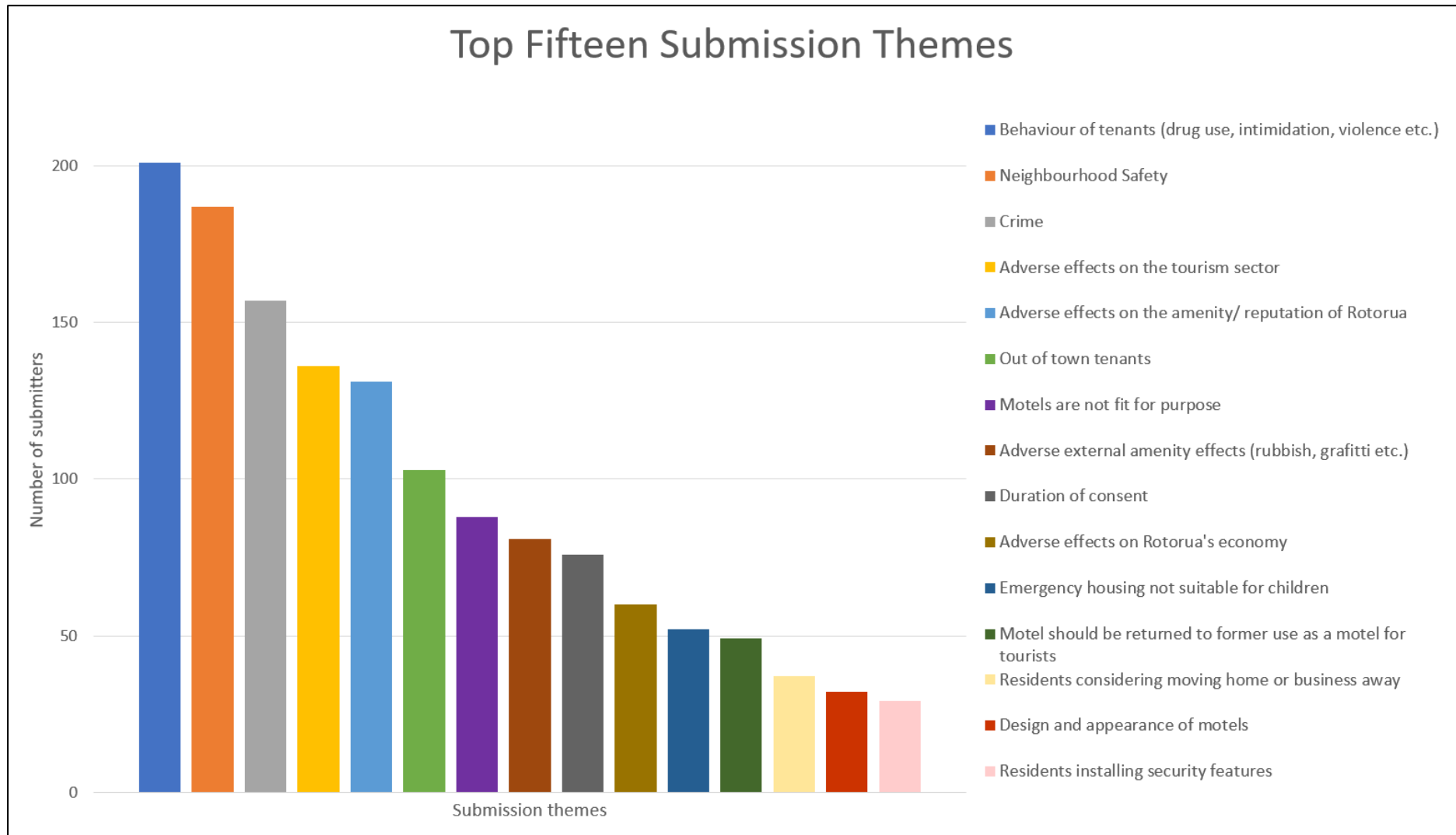


Figure 1: Summary graph showing the number of submitters who made a submission on the top 15 themes.

2.0 Social Effects

2.1 Behaviour of tenants, safety and crime

The main issues that arose from the submissions was the negative behaviour that was observed from emergency housing tenants (201 submitters), neighbourhood safety (187 submitters) and the increase in crime as a result of the emergency housing (157 submitters).

Most submitters recounted personal incidents of witnessing drug dealing, alcohol and/or drug use, begging in the streets, vandalism, trespassing, intimidation, loitering, late night parties, gang disputes, violence, and/or verbal abuse. These submitters stated that they had not experienced these incidents within the neighbourhood prior to emergency housing establishing (or at least very few occurrences). One submitter who owns several restaurants in Rotorua stated:

“The steps our restaurant took to adapt and cope with the unprecedented change in our neighbourhood in order to keep patrons and our staff safe highlights that this is a serious issue specific to the central Rotorua neighbourhood.”³

Submitters reported numerous incidents of break-ins and theft occurring at their business or within their home. As a result, many have installed additional security measures (discussed further in Section 4.5) or changed the way their business is managed. For example, some submitters stated that they now had to lock their front door during business hours, only to let in genuine customers. Data from New Zealand Police was referenced and showed there had been an increase in crime in the neighbourhood, and that Rotorua had one of the highest crime rates in the country. It was also stated there had been a noticeable increase in police / security presence and police sirens with the area.

Due to the occurrences outlined above, submitters were concerned for their safety within the neighbourhood (both within their homes or businesses and on the streets). This was particularly the case for residents who may be more vulnerable (eg. Elderly residents, or those with children, or disabilities).

It appears from the submissions that Glenholme (and adjacent areas) house a large proportion of residents that are elderly and retired. One submitter stated there is pensioner housing owned by Council in Glenholme and Fenton Park. Several submitters stated they lived within the area to be close to St Chad’s Charitable Trust (an organisation that works with disabled individuals), as they had children with disabilities. These submitters stated they no longer felt safe walking or biking within the neighbourhood, which they had previously enjoyed doing. For example:

“I made a decision in retirement to purchase a unit in Glenholme to be close to town and the Redwoods so I could continue to walk and bike instead of using a car and unfortunately I no longer feel safe in this area and I have had to resort to locking my yard and fencing myself in.”⁴

³ Submitter 15

⁴ Submitter 91

“The impact and subsequent disruption to our family has been significant in terms of Carl’s safety and ability to move about the area freely as he used to and his ability to continue living independently.”⁵

“My life has become extremely uncomfortable and nerve wracking my area is not a pleasant place to live and walk. I now have deadlocks on my doors.”⁶

Other submitters explained that the increase in crime in the neighbourhood was affecting their wellbeing. For example:

“My elderly mother has spent days crying at the stress of worrying about what the future holds with the motel next door We don’t want to move but don’t want to be in fear of our safety also.”⁷

“My home was my sanctuary, the one place in this world I felt safe. To have this stolen away from me is the worst feeling in the world, I want to move houses but it is not that simple”.⁸

There was also some fear among residents that if they spoke out to the emergency housing tenants or laid complaints to the motel managers that there would be retaliation from the tenants. One submitter recalled an incident of laying a complaint to a motel and woke up the next morning to find her fence covered in graffiti.

2.2 Out of town tenants

103 submitters expressed concern that not all emergency housing tenants were from Rotorua. Comments such as *“industrialised homelessness”⁹*, *“homeless hub”¹⁰*, or *“New Zealand’s homeless destination”¹¹* expressed views that MHUD and/or MSD are actively providing emergency housing for people who are not from Rotorua.

Submitters have commented that there is marked difference in the number of people requiring emergency housing in Rotorua prior to Covid-19 compared to the current situation; comparing the number of people living in Kuirau Park who were housed in Covid-19 emergency housing during the first lockdown compared to the current situation.

Submitters referred to newspaper articles, government reports, and advertising on social media platforms that suggest some emergency housing tenants are coming to Rotorua from around the country due to the availability of emergency housing.¹²

⁵ Submitter 168

⁶ Submitter 101

⁷ Submitter 106

⁸ Submitter 113

⁹ Submitter 48

¹⁰ Submitter 223, Submitter 146

¹¹ Submitter 178

¹² Submitter 18, Submitter 103

One submitter commented that at a public meeting *“one young man who spoke said he was in motel emergency accommodation and was from Wellington, not from Rotorua.”*¹³ Another submitter provided research on a document sourced from MSD and commented:

*“The only logical explanation is that Rotorua’s plethora of available motel space has been an easy solution for other cities to use as a dumping ground for their own homeless problems. Auckland, Hamilton, and Tauranga motel addresses feature prominently as the last known addresses, but motels from Invercargill to Whangarei and many towns in between, feature as well.”*¹⁴

Another submitter commented:

*“... it is abundantly clear the word emergency housing Rotorua has circulated and people are coming from wide and far. Prior to 2020, and as a Police officer working in the city there was only a handful of homeless people through the summer months and no homeless during the winter months.”*¹⁵

Submitters opposing the applications have felt Rotorua has been unreasonably “burdened” with emergency housing with one submitter commenting:

*“Rotorua should not be burdened to provide emergency housing for other regions. This responsibility should not fall on the Rotorua community’s shoulders and other regions need to step up and provide emergency housing solutions.”*¹⁶

Submitters also noted that for emergency housing tenants who are not from Rotorua *“anti-social behaviour... is likely to increase”*¹⁷ because they may not care about the area.

There were no comments from submitters in support of the applications in relation to “out of town” tenants.

2.3 Motels not ‘fit for purpose’

88 submitters have stated that they do not think motel accommodation is suitable for contracted emergency housing.

Concerns raised by these submitters centred on the suitability of motels for children, occupancy rates, the proposed length of stay and subsequent lack of facilities for that length of stay. Many submitters stated that motels were not appropriate for long-term accommodation without going into further detail. The issues raised by submitters in relation to motels not being fit for purpose often lead onto concerns of poor health and wellbeing outcomes for emergency housing tenants, particularly for children.

¹³ Submitter 60

¹⁴ Submitter 69

¹⁵ Submitter 74

¹⁶ Submitter 102

¹⁷ Submitter 142

Regarding the suitability of motels for children, submitters raised concerns around children's exposure to anti-social behaviours of other tenants, the lack of safe on-site play space, and the long-term effects on children, for example:

*"...the use of motels for emergency housing robs children of the environment needed to learn and play. Even if for short durations, placing a child in a motel environment can have long term effects on their learning, behaviour, and wellbeing."*¹⁸

*"Children should not be raised in cramped, close quarters, without access to a garden or area to play. These forms of housing will be detrimental to the development, mental health, and physical health of children living in them."*¹⁹

*"I observe that cars frequently move in and out of the car parks, which is the only space available at these motels for the children to play. I consider this a huge health and safety risk for the children."*²⁰

Submitters stated that the proposed number of people to a room is inappropriate. Concerns were raised around overcrowding, for example:

*"...The intention is to have three to four persons... per one bedroom, which, as we might all agree will highly likely be children and young people. This breaches measures used by Statistics NZ...to assess the bedroom requirements of a household and can be defined as over-crowding."*²¹

Submitters were concerned about the adequacy of motel facilities to cater for long-term tenants. A lack of ventilation, inadequate or shared cooking areas and laundry facilities, lack of outdoor space, and small room configurations were all cited as reasons motels should not be used for long-term emergency housing. For example:

*"The facilities are not sufficient, therefore is not enough space in the room to stay long term; there is not enough space to exercise, to cook healthy meals, to wash/dry clothes."*²²

*"The Motel style complex does not offer safe, suitable, compliant indoor spaces. We respectfully contend that the units would fail Healthy homes compliance testing in terms of insulation, ventilation, and access to kitchen and laundry facilities."*²³

2.4 Residents considering moving home or business away

37 submitters stated they were considering moving their home or business away, or had already moved away, due to the negative effects of emergency housing within the area. For example:

¹⁸ Submitter 21

¹⁹ Submitter 70

²⁰ Submitter 21

²¹ Submitter 367

²² Submitter 142

²³ Submitter 173

“After carefully considering our situation, the options we had and the responses from those in authority, in December 2021 we decided that our only viable option was to sell our disabled sons house in Glenholme and our property in Lynmore and leave Rotorua. This was a very difficult decision to make, but by now we had lost hope that Glenholme and Rotorua would be safe enough in the future for our son to continue living semi independently in Grey Street.”²⁴

Some submitters stated there is currently a shortage of essential workers in Rotorua and the fact that people are looking to move away will only exacerbate this problem.

2.5 Need for contracted emergency housing

There was some alignment between a number of submitters opposing the applications and submitters supporting the applications on the need for emergency housing. Population growth, a historic housing shortage, and lack of affordable housing options are reasons listed by submitters for the growing demand for emergency housing. One submitter states:

“It is widely recognised that there is a housing crisis in New Zealand and that it is being experienced most acutely by particular groups, including Māori, Pacific peoples and other minorities, people with disabilities, single parents (particularly single mothers), young people and children, and those living in poverty.”²⁵

This submitter goes on to say:

“Rotorua Lakes Council’s support of the resource consent applications ensures the fundamental right of people who are experiencing homelessness to safe and decent housing, albeit in this case emergency short term housing.”²⁶

Another submitter states:

“No one thinks living in motels is a desirable long-term solution for homelessness, however it is better than less desirable options, such as living in garages, overcrowded houses and cars, or sleeping rough.”²⁷

For many submitters supporting the applications, emergency housing provides more security and comfort than previous living conditions. This submitter states:

“I think emergency housing should continue as some families in reality cannot afford the expenses that come with being in a home. It’s a really good opportunity for families who are in hardship and need help with resources that WERA provide. How are families over 5+ going to survive, where will we live, in a car?”²⁸

²⁴ Submitter 168

²⁵ Submitter 206

²⁶ Submitter 206

²⁷ Submitter 247

²⁸ Submitter 289

Other submitters also referred to the support provided for tenants through contracted emergency housing (as opposed to traditional emergency housing) as being beneficial for tenants' health and wellbeing, security, and for providing opportunities to learn skills associated with renting or owning a home.

For some submitters opposing the applications, emergency housing was seen as appropriate if it was for people 'genuinely' from Rotorua, if the number of providers decreased and were distributed over a wider geographical area, and if there were better controls and/or methods put in place to lessen adverse impacts on the surrounding community, for example:

*"Emergency Housing and wrap around services are needed but they must be delivered in such a way as to cause limited impact on surrounding neighbourhoods and communities."*²⁹

2.6 On-site management / support services

26 submitters stated that the current on-site management / wrap around services were inadequate. It was unclear whether these submitters were referring to the subject sites specifically or MSD sites (which do not provide any on-site management). Many submitters stated that the motels have been operating for over a year now and have not worked to resolve these issues.

The main comments related to the lack of social workers and security staff present at the sites. For example:

*"Tenants I have talked to have made claims that while they were supposed to be visited by a social worker weekly, they hadn't seen one in 6 weeks. Another tenant said they had been in the accommodation for 6 months without seeing a social worker. They have also made claims around intimidation by those associated with the Managed motel charity staff, intimidation by the security staff employed by these charities and by gang members. Most were too scared to make formal complaints for fear of reprisals."*³⁰

On the other hand, several submitters stated that even though there is on-site management, most of the problems are occurring on the streets when the tenants are not on site.

It was also stated that Rotorua in general does not have sufficient wrap around services to cope with the increase in homelessness. This is linked back to submitters stating that a large majority of emergency tenants were being brought in from out of town. The services mentioned that are currently under pressure include police, hospitals, doctors and nurses, mental health providers, and social workers. Some submitters claimed that due to the lack of availability of police staff in Rotorua, police often cannot respond to incidents in a timely manner.

3.0 Character and Amenity Effects

3.1 Reputation of Rotorua

131 submitters commented that emergency housing was causing an adverse effect on the amenity and/or reputation of Rotorua. This relates to the local and international 'brand' of Rotorua, visitors'

²⁹ Submitter 345

³⁰ Submitter 48

opinions of Rotorua, and locals' opinions of Rotorua. The majority of submitters raising this issue related it to the clustering of emergency housing motels along Fenton Street.

'Reputation' was a commonly used word in submissions. Submitters described the reputation of Rotorua prior to Covid-19 as "*vibrant*", "*beautiful*", and "*attractive*". Visitors to Rotorua were described as staying for multiple days at a time, staying in motels along Fenton Street, and enjoying the inner-city. Submitters stated that with the influx of emergency housing and subsequent factors of anti-social behaviour, crime, the degraded appearance of motels, and increased litter, the 'reputation' of Rotorua has now changed for both locals and visitors. For example:

"The high concentration of these motels has completely changed the character of Rotorua due to the disproportionate increase in crime, a significant presence of police at motels that accommodate emergency housing occupants, and a noticeable decline in the aesthetics of our city centre.

...clustering emergency housing creates a slum..."³¹

Several terms are also used to describe what submitters understand to be Rotorua's current reputation, particularly along Fenton Street, these phrases include "*ghetto*", "*homeless hub*", "*emergency housing hub*", "*MSD Mile*", "*dumping ground*". For example, one submitter writes:

"Rotorua was once referred to as "Rotovegas" as a compliment. Unfortunately that no longer applies. Rather we hear reference to Slum City, Rotohomeless, and Rotoslum, and Fenton St, once the Golden Mile now referred to as MSD Mile."³²

Other comments from submitters include:

"We know from people outside of Rotorua including family and friends who now have concerns and are reluctant to visit Rotorua because of the crime and disorderly behaviour, Particularly around the city and Fenton street. This has had a huge impact on the city, especially when people from as far away as Northland and Queenstown are talking negatively about Rotorua."³³

"We have watched Fenton Street, the main southern route into the heart of our town, deteriorate from an attractive street, lined with tourist accommodation, into what is in essence a slum."³⁴

"Our City has been radically transformed from one of the leading Visitor Destinations in Aotearoa, known for its warm welcome, beautiful gardens and safe streets into a "shabby, unsafe and unwelcoming" town."³⁵

Some submitters referenced newspaper articles or news outlets commenting on the deterioration of Rotorua because of emergency housing.

³¹ Submitter 234

³² Submitter 53

³³ Submitter 370

³⁴ Submitter 245

³⁵ Submitter 114

3.2 External amenity effects

External amenity effects relate to the off-site effects of emergency housing. 81 submitters described an increase in rubbish, graffiti, and shopping trolleys in neighbourhoods surrounding emergency housing providers.

This theme also captures what submitters have observed as a cumulative effect of locating emergency housing providers together, particularly along Fenton Street, leading to a change in the character and amenity of an area. Many submitters from the Glenholme area have described their suburb as previously being quiet, safe, friendly, and tidy, whereas it is now littered with rubbish and graffiti. For example:

“These motels being used for social housing has placed a dark cloud over this community and I find myself while walking or cycling into the CBD running a gauntlet of high security fencing, orange cones, illegally parked cars on now destroyed berms, shopping trollies, broken glass, littered rubbish and graffiti. Many of the social housing motels are now shabby in appearance and poorly managed. The area surrounding the intersection of Sumner and Fenton Streets has developed into a no-go area for many residents while out walking.”³⁶

“Since November 2020 the surrounding area around my store has become marked with considerable graffiti. Prior to this, neither graffiti or vandalism near my store were issues in this neighbourhood.”³⁷

3.3 Design and appearance of motels

32 submitters describe emergency motels as having fallen into a state of disrepair since their use as emergency housing. Broken windows, temporary fencing, rubbish, graffiti, abandoned shopping trolleys, and unkempt landscaping, are common descriptors. One submitter noted:

“There has... been a large quantity of temporary fencing put up around the motels and certain entrances have been blocked off with road cones, which looks very untidy and unwelcoming. For example, the Malones Motel at 321 Fenton Street has its Sumner Street entrance blocked off with temporary Fencing made of 4 different materials. The Fenton Street entrance is partly blocked with road works cones.”³⁸

Some of the reasons given for this state of disrepair are the behaviour of tenants and the lack of incentive on behalf of the motel operators to maintain the properties as they are no longer competing for tourists, for example:

“The commercial incentive of maintaining the aesthetic of the motels in order to attract guests no longer effects motel owners who are being paid directly by the Ministry of Social Development.”³⁹

³⁶ Submitter 354

³⁷ Submitter 5

³⁸ Submitter 18

³⁹ Submitter 18

“A number of the suppliers of Emergency Housing have let their properties go into disrepair. There seems to be no accountability or requirement for operators to maintain verges, remove graffiti and maintain their motels.”⁴⁰

Length of stay and occupancy rate is also given as a reason for the current “state” of emergency housing motels, like the ‘Motels not fit for purpose’ theme, and that the motels are not designed for a high level of occupancy by the same tenants for long periods of time. As a result, the appearance of the motels suffers. For example:

“Motels cannot cater for people living in effect in “overcrowded” circumstances (3 to 4 persons per single room). This will lead to tenants spilling into and around the surrounding area of the motels. The normal effects of people in permanent residency begin to spill into the surrounding areas (rubbish, cars, children’s toys, and effects, people’s personal effects, pets, facades become filled with people smoking and loitering etc.).”⁴¹

3.4 Noise

18 submitters commented on adverse noise effects from emergency housing, whether it be related to noise from the providers or noise changes in the neighbourhood over the last few years. A common thread was the increase in emergency vehicle sirens, particularly police sirens. Some of the submissions relating to noise came from submitters living adjacent to or near to emergency housing providers. Comments in relation to adverse noise effects included:

“With the sound of constant sirens blasting, screeching brakes, burnout’s or the speed that they travel straight through the Stop sign on our corner at, (ie failing to stop) waiting for the crash to happen with some innocent person involved, or due to just being very noisy rowdy cars, it has all, taken a toll on me.”⁴²

“At its very worst, the daily noise pollution of disgraceful language, violence, parties, visitors revving cars, brawls, dogs barking from what use to be spa pool areas, and Police sirens has been of the scale of any acceptable standard for a safe, stable and liveable community.”⁴³

3.5 Clustering of motels / number of motels

Many submitters are concerned with the number of motels being used for emergency housing and their proximity to one another, particularly along Fenton Street. The number of motels being used for emergency housing is referred to where submitters refer to social effects, character and amenity effects, and economic effects.

Some submitters have indicated that they would be okay with less emergency housing providers, and for these providers to be spread out across the city. One submitter opposed all applications for emergency housing along Fenton Street but supported the remaining seven applications. This submitter stated:

⁴⁰ Submitter 345

⁴¹ Submitter 46

⁴² Submitter 182

⁴³ Submitter 187

“...I SUPPORT all other applications where the motel is situated off Fenton Street (total of 7 motels) as I believe there is a desperate need to house people since and/or during the covid pandemic. These “side street” premises seem to have management under control, more so than the Fenton Street premises and they are not an “eye sore” to our visitors with Fenton Street being the Golden Mile.”⁴⁴

4.0 Economic Effects

4.1 Tourism sector

136 submitters stated that the applications would have an adverse effect on the tourism sector of Rotorua.

The main issue raised, was that the use of the motels for emergency housing meant there was a lack of affordable accommodation options in central Rotorua. The lack of accommodation meant that visitors were either reducing their length of stay, just visiting for the day, or choosing to stay in other cities.

Restore Rotorua Incorporated engaged an economist⁴⁵ to prepare expert evidence (described further in Section 4.2 below), which stated that in November 2021, 60%⁴⁶ of the available accommodation options in Rotorua were being used for emergency or transitional housing (which includes sites not part of these applications). The reduction in tourists is expected to have a flow on effect on Rotorua’s economy, as discussed below.

“Rotorua in particular needs assistance as the recovery of the Rotorua Tourist Industry is now further handicapped by the use of motels and motel rooms for Emergency Housing. This significantly reduces the accommodation rooms available within the city for tourism purposes. And although the owners of those motels used for Emergency Housing have benefited, there are so many other tourist related businesses in Rotorua that have suffered, will continue to suffer and be unable to fully recover because these motels are no longer available for the Tourist Industry and for their customers, both National and International.”⁴⁷

“The tourists that remain interested in visiting Rotorua are finding it hard to book accommodation in our city. They report that the few accommodation options left in Rotorua (which do not accommodate emergency housing occupants) tend to be less affordable, five-star accommodation.”⁴⁸

The second issue raised was that as a result of emergency housing, and the negative reputation Rotorua had been receiving (through word of mouth, within the media, and on Tripadvisor etc.), many people were now choosing to avoid staying in Rotorua. Many submitters noted that people

⁴⁴ Submitter 143

⁴⁵ Refer to expert evidence of Kevin Counsell (attachment to Restore Rotorua submissions). This evidence was prepared in December 2021 and relates to the six applications for resource consent received at that time.

⁴⁶ 54 of the 90 establishments

⁴⁷ Submitter 184

⁴⁸ Submitter 13

were coming to Rotorua to visit during the day but choosing to stay in nearby cities such as Tauranga or Taupo.

It was stated that there had been significant investment in Rotorua's tourism sector (including \$1.5m from the Government) and these applications were undermining these investments.

4.2 Rotorua's economy

60 submitters stated that the applications would have an adverse effect on Rotorua's economy. In particular, it was stated that many businesses had been struggling due to Covid-19 restrictions and the continuation of emergency housing would make things worse.

Several submitters stated there had been no assessment undertaken by the applicant to understand the effects on the economy of Rotorua. As mentioned above, Restore Rotorua Incorporated engaged an economist to prepare expert evidence⁴⁹, which many of the submitters referred to. Some issues from this evidence are:

- Tourism accounts for around 17% of Rotorua's Gross Domestic Product (GDP) compared to a 6% share of GDP nationally.
- The number of hotels and motels available for tourists has decreased in Rotorua by 30%, compared with only 5-6% in other tourist regions such as Taupo and Queenstown. The reduction in tourist accommodation will flow through to a reduction in tourist expenditure at businesses in Rotorua.
- To use Pohutu Lodge Motel as an example, the use of the motel for emergency housing is likely to result in a loss of, on average, approximately \$110,000 per month in domestic tourism expenditure in Rotorua. Over a one-year period, the loss in expenditure is approximately \$1.3m (or an annual loss of \$90,000 per motel unit).
- Economic analysis shows that crime can impose a range of economic costs on society, including medical costs, property losses, loss of income and increased security costs.
- There may be some positive economic effects arising from the use of the motels in emergency housing, specifically in respect of motel owners who profit from the sale or contracting of their motels to the government. However, when considering these positive effects against the direct loss of tourism profits to the motels there is likely to be only a marginal gain.

4.3 Installation of security measures

29 submitters stated that as a result of the increase in crime from emergency housing, they had to install security measures at their place of residence or business, which was a significant cost. This included security fencing, alarms, security lights, doors, cameras, or increased presence of security guards. Other submitters stated they would like to install additional security measures, however, were unable to afford these. Several submitters stated that they had never worried about security before, and they shouldn't have to live in fear. For example:

⁴⁹ Refer to expert evidence of Kevin Counsell (attachment to Restore Rotorua submissions).

“After an antisocial outburst in our street the police advised one of the retired couples in our street to install a security gate on their property. We do not want to live behind high fences and gates in our retirement.”⁵⁰

4.4 Effects on surrounding businesses

26 submitters stated that the emergency housing has been affecting surrounding businesses. Specifically, a number of submitters owned or operated businesses in the vicinity of the motels relating to hospitality, accommodation, tourism, retail, commercial, and childcare. The main concerns included:

- Difficulty in attracting customers and tourists. It was noted by some tourism operators that the direct business that had come from motels has significantly reduced, and therefore they are looking at advertising in other places (Airbnb for example). Submitters stated that they were regularly asked about the emergency housing situation in Rotorua, and visitors would often avoid these areas.
- Concerns over safety for staff. Some business owners have had to implement new security measures to keep staff safe. For example, locking the front doors during business hours.
- Impacts on the recovery of the business post Covid-19. Many business owners were concerned that their business would not be able to recover considering the emergency housing situation on top of the Covid-19 restrictions.
- One submission was received from the owner of two childcare facilities which are located near Alpin and Apollo motels. The submitter was concerned for the welfare of the children being so close to the problems occurring on the streets.

4.5 Property values

25 submitters stated that the applications would have an adverse effect on the value of their property or business. For example:

“I am too fearful to get our business revalued as I have reached my limit feeling a sense of loss and frustration at the decline in safety and in the economy of our city.”⁵¹

5.0 Traffic Effects

5.1 Traffic safety

14 submitters raised concerns around the safety of children from emergency housing playing behind cars or on roads. This theme is closely linked to the social theme of emergency housing motels not being ‘fit for purpose’. Five of these submitters submitted on 7 or less applications, suggesting they were observing behaviour specific to contracted emergency housing providers. The following are comments from submitters:

“...children from the Apollo site have been observed crossing the road and playing/riding their bikes in the Property carpark. This gives rise to a significant health and safety risks.”⁵²

⁵⁰ Submitter 118

⁵¹ Submitter 13

⁵² Submitter 295

“Toddlers behind parked motel vehicles are particularly at risk from through traffic.”⁵³

5.2 Carparking

7 submitters raised concerns about the existing availability of carparking on the streets surrounding emergency housing providers and the capacity to cater for vehicles from emergency housing tenants and staff. For example:

“There are already issues with vehicles parking on the verge and on 14 Sala Street. Further occupation density will exacerbate this and is caused by staff and visitors not having room or direct access into the site, partly due to density and partly due to the barrier arm in place.”⁵⁴

All except one of these submitters are referring to a specific contracted emergency housing provider.

6.0 Planning Matters

6.1 Duration of consent

76 submitters stated that the duration of consent sought for the applications was too long, particularly considering the motels had already been operating for some time. As stated in Section 7.2 below, many submitters recommended that if the consent was granted, that it should be for a shorter duration.

6.2 District Plan / RMA matters

63 supporting submitters stated the applications were consistent with the objectives and policies of the District Plan, although did not provide a reason as to why they were consistent.

23 submitters stated the applications were inconsistent or contrary to the District Plan or the RMA. The most common reasoning was:

- A number of the motels are located within the “City Entranceway” under the District Plan. The current appearance of Fenton Street goes against the vision for these areas.
- The application states that the effects of the activity would be similar to the existing tourism accommodation activity. However, submitters consider that the effects would be different due to the longer-term occupancy, the occupancy rate, and the type of occupants. Submitters consider that the adverse effects of the activity on the environment would therefore be more than minor.
- All of the applications exceed the District Plan density standards.

Due to the reasons as outlined above, many submitters claimed the application(s) would not pass the gateway test for non-complying activities as set out under Section 104D of the RMA, and would not give effect to Part 2 of the RMA.

⁵³ Submitter 195

⁵⁴ Submitter 319

6.3 Other matters

A number of submitters expressed their frustrations at other matters, including:

- Concerns around the lack of consultation with the community.
- Two submissions were received from the owner of Alpin Motel and Emerald Spa Motel who claimed that the use of the motel for emergency housing is not compliant with the existing lease agreements.
- Some submitters consider that the proposal does not comply with local government bylaws.
- There were some concerns around the notification process and the complexity of the submission requirements.
- Concerns that the motel owners / managers are making large profits from emergency housing. One submitter stated:

“Emergency housing has been incentivised for both tenant and landlord, it is now an industry in itself, to the detriment of community and industry.”⁵⁵

Some submitters also noted that the motels are now advertising rooms on Facebook Marketplace for emergency housing tenants.

7.0 Relief Sought

7.1 Primary relief

274 submitters sought that the consent was declined, and 69 submitters sought that the consent was granted. 8 submitters did not state or only provided secondary relief (see Section 7.2 below).

7.2 Secondary relief

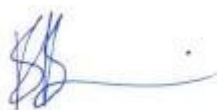
Of those who recommended that the consent was declined, a number of submitters put forward secondary relief if the consent was granted. The most common recommendations included:

- That the term of resource consent be reduced (generally one to two years).
- That a review clause is implemented within 12 months of the grant of consent to deal with any adverse effects (including on amenity, traffic, security and health and safety) and at that point consider whether any amendments to the consent are required.
- That there is no right of renewal on the resource consent.
- Removal of the motel signage so that tourists do not associate emergency housing with the motels (including its presence on online booking websites).
- Removal of temporary fencing (including road cones) and installation of more permanent, attractive features.
- Installation and maintenance of landscaping, including maintenance of front berms and gardens.
- Provide an on-site dedicated play area for children, and/or measures to inform and encourage residents use of local parks.
- Additional police staffing / security presence.

⁵⁵ Submitter 164

- Traffic and parking management measures.
- Limiting occupants of the motels to Rotorua residents and not for those who are from out of town.
- Council should implement a “sinking lid policy” so that once all of the current tenants are relocated, the motels can return to their former use as tourist accommodation.
- Zero tolerance clause for the use of illegal drugs and criminal behaviour.
- Require consultation and engagement with neighbours, including:
 - Providing an 0800 number so that neighbours / residents can raise issues.
 - Have regular community meetings / establish an accord with Council, police and business owners.
 - Providing opportunity for input into the Site Management Plan.

Prepared by:



Bethany Bennie
Planner
BOFFA MISKELL LTD



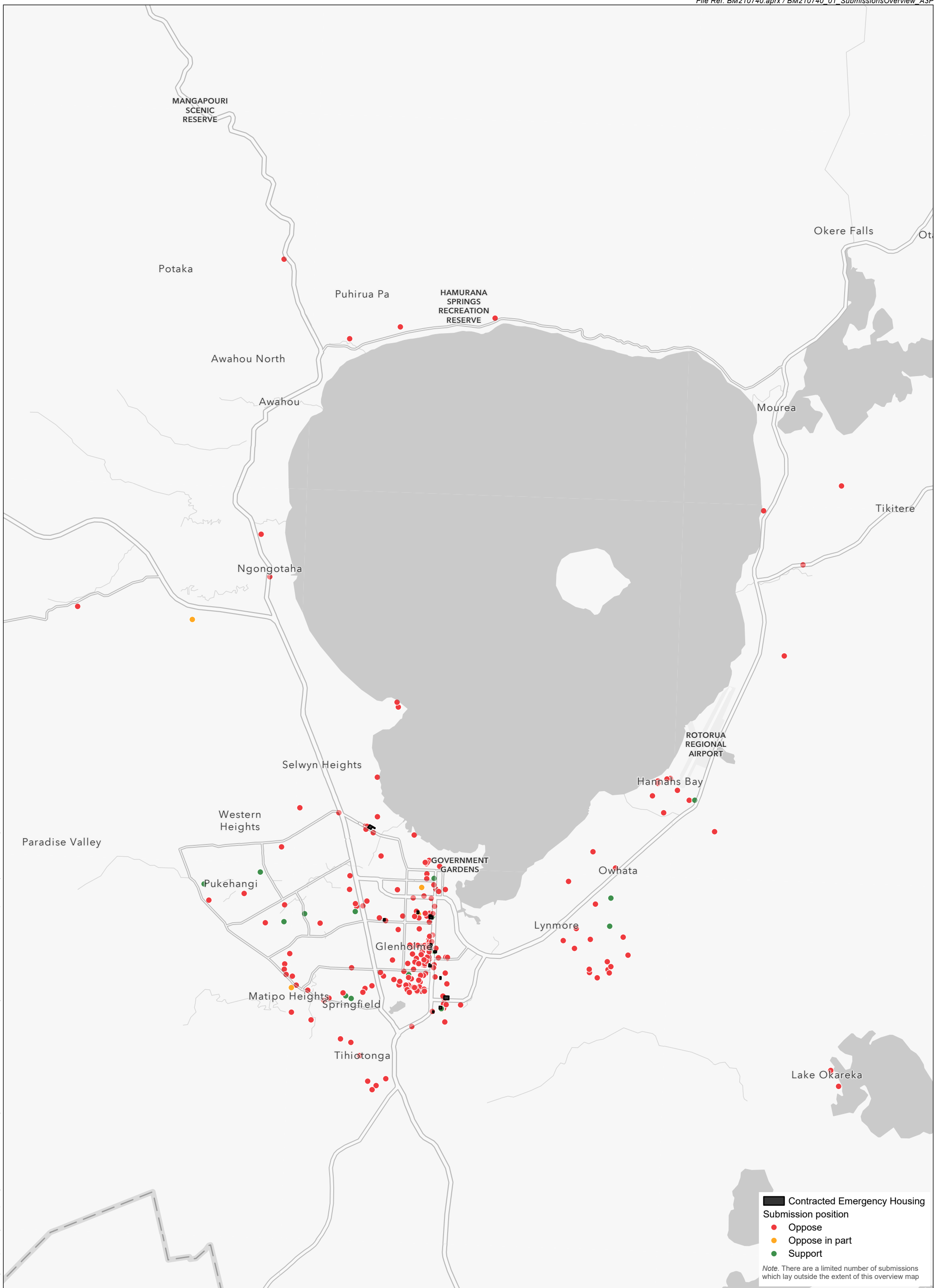
Charlotte MacDonald
Planner
BOFFA MISKELL LTD

Reviewed by:

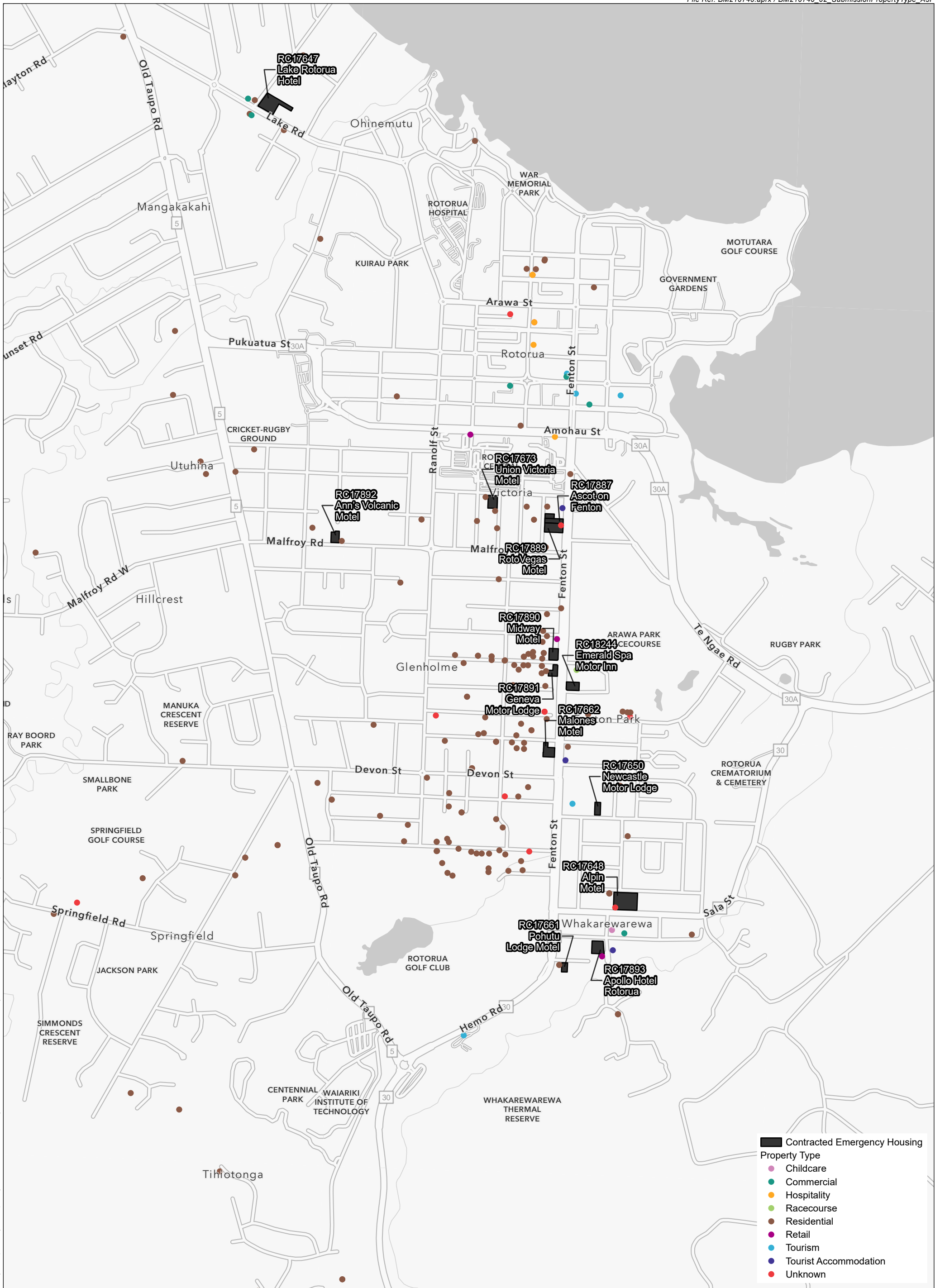


Craig Batchelar
Director - Planner
Cogito Planning

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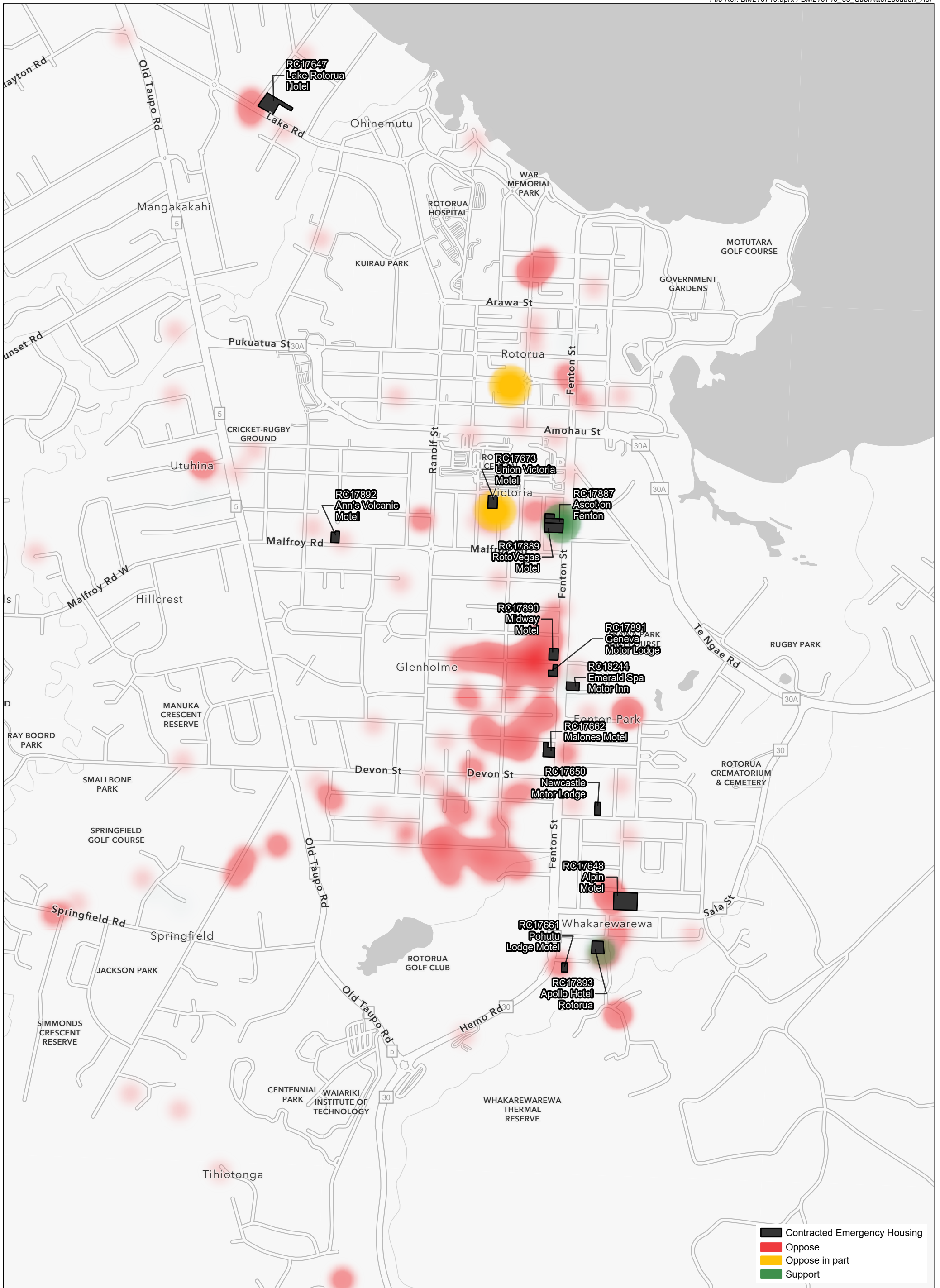


Contracted Emergency Housing

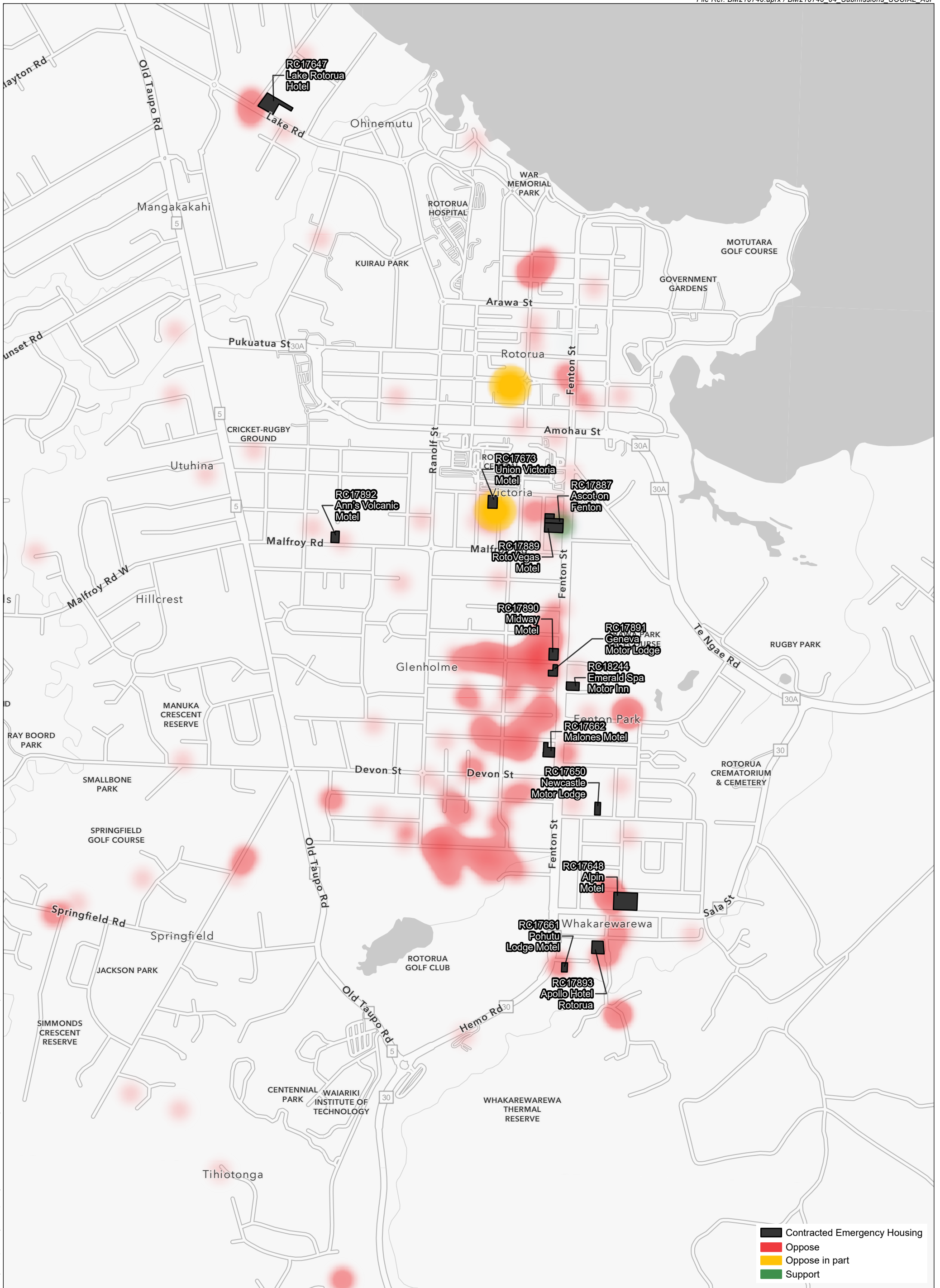
Property Type

- Childcare
- Commercial
- Hospitality
- Racecourse
- Residential
- Retail
- Tourism
- Tourist Accommodation
- Unknown

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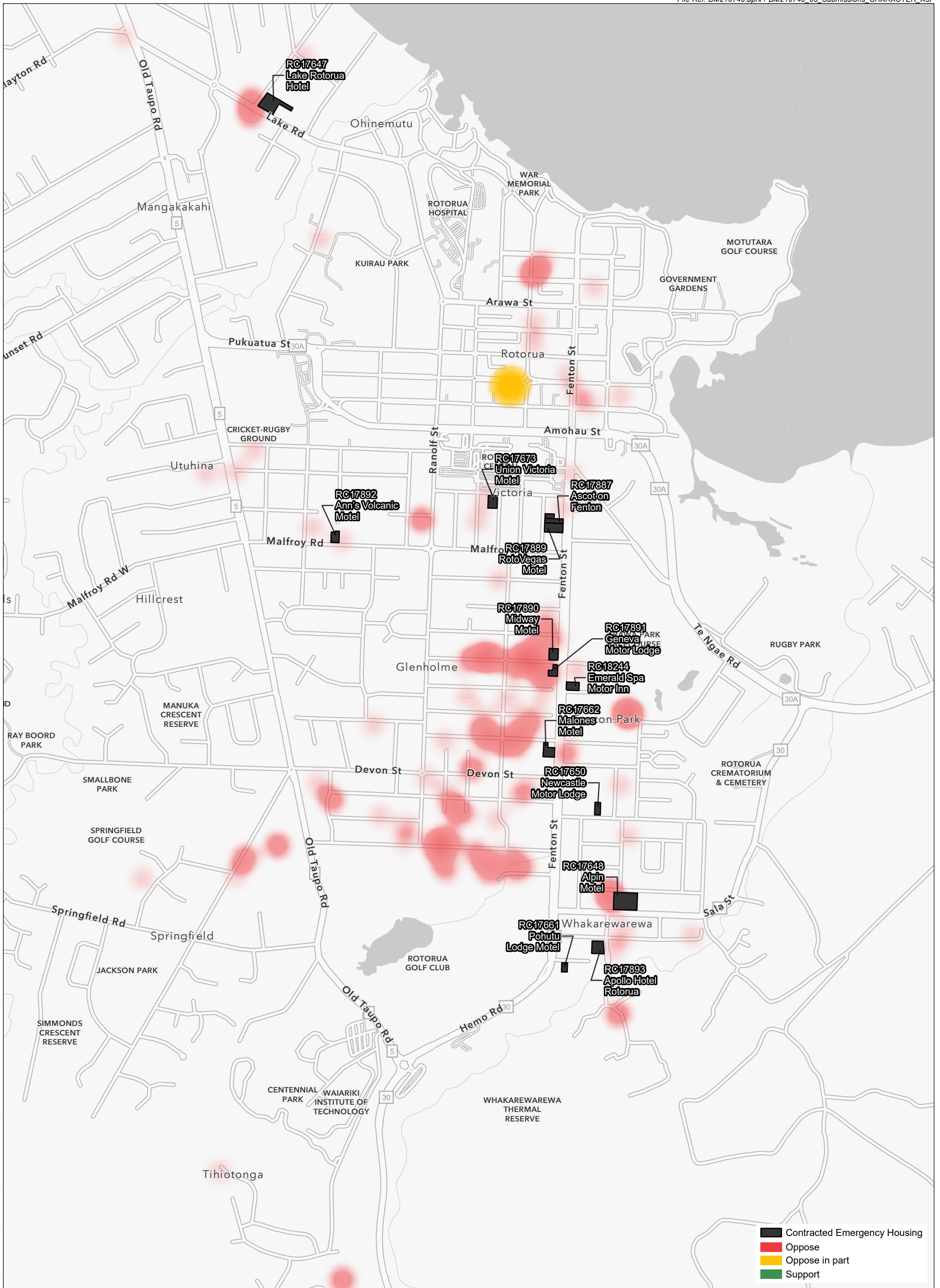


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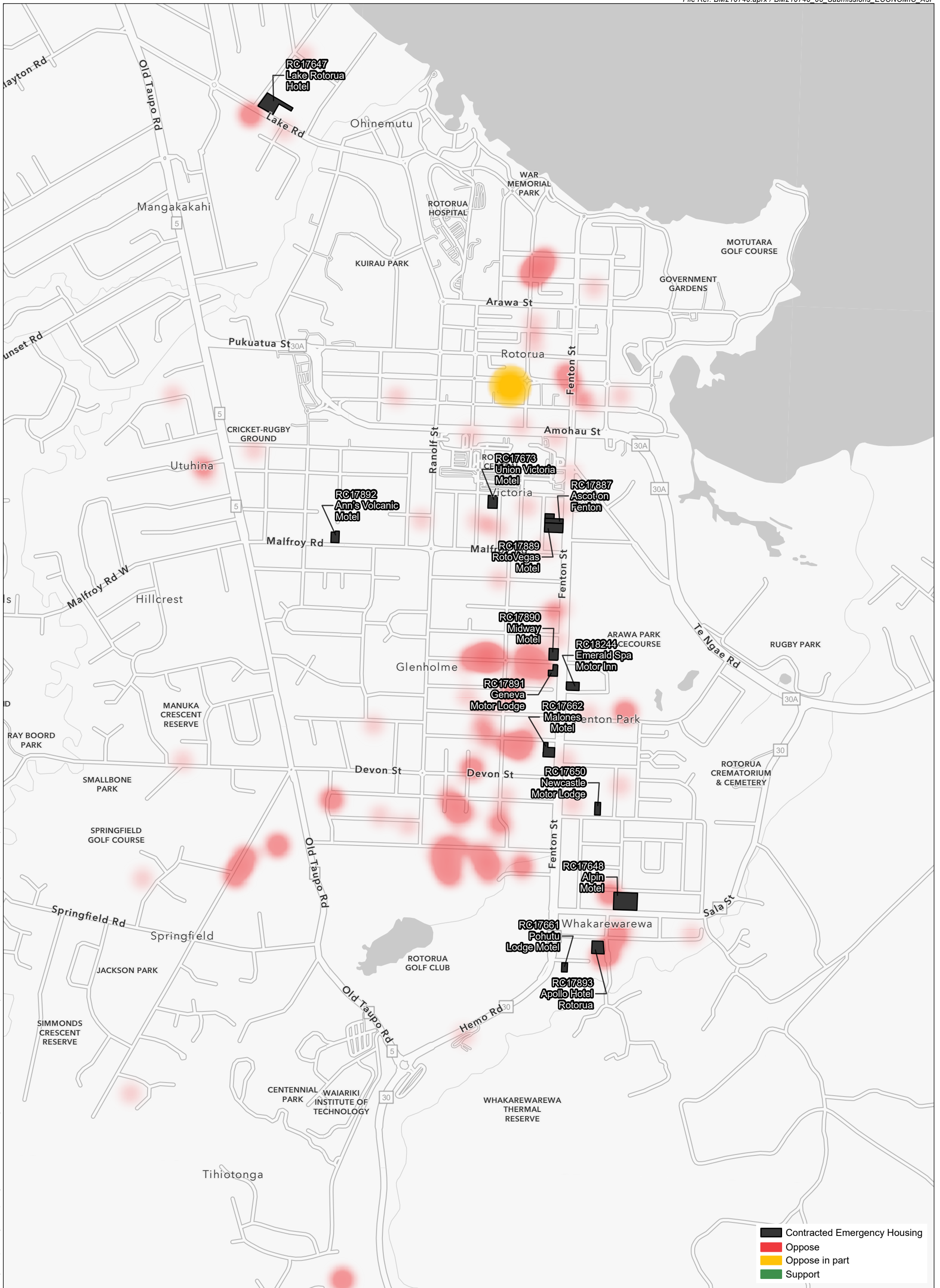


- Contracted Emergency Housing
- Oppose
- Oppose in part
- Support

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- Contracted Emergency Housing
- Oppose
- Oppose in part
- Support

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- Contracted Emergency Housing
- Oppose
- Oppose in part
- Support