

**IN THE MATTER OF** the Resource Management Act 1991  
(**RMA**)

**AND**

**IN THE MATTER OF** 13 publicly notified resource consent  
applications by Te Tūāpapa Kura Kāinga –  
the Ministry of Housing and Urban  
Development (**MHUD**) to the Rotorua  
Lakes Council (**RLC**)

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**STATEMENT OF EVIDENCE OF VINCENT JOHN MURPHY ON BEHALF OF RESTORE  
ROTORUA INCORPORATED**

**PLANNING**

**12 OCTOBER 2022**

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## Introduction

1. My name is Vincent John Murphy. I am employed as a consulting Senior Planner at Momentum Planning and Design Ltd, a planning and development, urban and landscape design consultancy based in Tauranga, Bay of Plenty.
2. I hold the qualifications of a Bachelor of Social Science majoring in Environmental Planning from the University of Waikato, and a Masters of Planning Practice from the University of Auckland.
3. I have worked as a professional planner for over nine years, employed by territorial authorities, as well as private sector consultants, in New Zealand and the United Kingdom. My planning experience includes employment with Auckland and Wellington City Councils, the London Borough of Lewisham, WSP and Bloxam Burnett and Olliver land development consultants, prior to my current role. I returned to New Zealand from the United Kingdom in 2020.
4. I am an intermediate member of the New Zealand Planning Institute and a member of the Resource Management Law Association.
5. My experience has been predominantly undertaking planning assessments in respect of resource consent applications in a wide range of contexts, particularly urban environments. This includes commercial, accommodation, recreational and housing developments, considering their effects and their consistency with provisions of relevant planning instruments.
6. I have been engaged by Restore Rotorua Incorporated (RRI) to give expert planning evidence in the matter of the 13 publicly-notified resource consent applications for Contracted Emergency Housing (CEH) use within established motels in Rotorua.

### **Code of Conduct for Expert Witness**

7. I acknowledge this is a Council-level hearing. However for completeness I have read and agree to comply with the Code of Conduct for Expert Witnesses contained in the Environment Court's Practice Note 2014. I confirm that this evidence is within my area of expertise, except where I state that I am relying upon the specified evidence of another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

### **Scope of evidence**

8. In this statement of evidence, I will address the following matters:
- (a) Overview of the application sites, proposal, activity status, and relevant statutory planning framework pursuant to s104 of the RMA;
  - (b) The environment as it exists currently, and the permitted baseline;
  - (c) Effects of the proposed activities;
  - (d) Alternatives consideration;
  - (e) Performance against relevant objectives and policies;
  - (f) Satisfaction of the 'gateway test' pursuant to s104D of the RMA;
  - (g) Potential conditions pursuant to s108 of the RMA; and
  - (h) Other relevant matters within the scope of s104 of the RMA.
9. In undertaking my assessment, I have had regard to the following documents:
- (a) Statement of Evidence of the following experts:
    - (i) Kevin Counsell (Economics – on behalf of RRI);
    - (ii) Natalie Hampson (Economics – on behalf of RLC);
    - (iii) Nick McNabb (Economics – on behalf of MHUD);
    - (iv) Shamubeel Eaqub (Economics – on behalf of MHUD);

- (v) Sarah Collins (Landscape Architecture – Children’s Play – on behalf of RLC);
  - (vi) Rebecca Foy (Social Impact – on behalf of RLC);
  - (vii) Jo Healy (Social Impact – on behalf of MHUD).
- (b) The s42A overview report prepared by consultant planning expert Craig Batchelar on behalf of RLC, and proposed site-specific and strategic conditions of consent.
- (c) Individual s42A reports specific to each application site prepared by consultant planning experts Bethanie Bennie and Charlotte MacDonald, on behalf of RLC.
- (d) Evidence of, and the 13 original Assessments of Environmental Effects’ (AEE’s) prepared by, consultant planning expert Alice Blackwell on behalf of MHUD.
10. I can confirm a site visit and observation of all 13 application sites and their surrounding contexts was carried out on the 4<sup>th</sup> of October 2022.

### **Executive Summary**

11. The environment as it exists, and upon which the effects must be assessed, includes other Emergency Housing (EH) use of motels in Rotorua not sought as CEH by MHUD. Effects generated by these activities are appropriate to consider and it follows that the same effects must be considered cumulatively or in aggregate i.e. as added to by the proposals. To do otherwise would create an artificial starting point for effects consideration, in my view.
12. A credible adverse economic impact in the order of \$31.4 million a year, or over \$188 million over six years to be effectively consented, would be the result of the 13 CEH applications upon the Rotorua economy. This derives from

lost tourism expenditure, interrelated 'multiplier' effects throughout the economy (i.e. flow on effects to related business'), and increased crime.

13. The above figures represent only 23% of the economic impacts of EH use of motels in Rotorua. Economic effects of 77% of EH have not been quantified owing to being outside of MHUD's scope of application, however can be assumed to follow the trend of reduced expenditure into the economy.
14. Exacerbating the above effects is the complete loss of international tourists for a large proportion of the years of 2020 through to 2022 owing to the Covid-19 pandemic and border closures. International visitors make up at least 20% of Rotorua's tourist visitors<sup>1</sup>.
15. I accept the advice of Mr Counsell accounting for a range of economic effects and considering them cumulatively, whilst having regard to the position of Ms Hampson and by extension Mr Shamubeel with more isolated consideration of CEH economic effects.
16. Mr Counsell advises that the cumulative adverse economic effects, when considering also the effects of the existing EH uses in Rotorua in lieu of tourism accommodation in conjunction with the effects of the same at the CEH sites, are more than minor and significant<sup>2</sup>. The same effects of the CEH's uses alone or in isolation are considered to be more than minor by Mr Counsell.
17. Cumulative adverse economic effects as added to by the proposals are more than minor and significant based on the expert advice received. I further consider there to be more than minor, significant and unacceptable social impacts generated from the proposed CEH sites to regular users, customers and business operators, and persons residing near the Fenton Street corridor,

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<sup>1</sup> 20% suggested at paragraph 230, Evidence of Natalie Hampson dated 5th October 2022; however the Rotorua Long Term Plan suggests based on 2019 data, international overnight visitors made up 35% of total visitors to Rotorua (pg 229).

<sup>2</sup> Paragraph 9, Evidence of Kevin Counsell dated 11<sup>th</sup> October 2022.

based on the magnified and concentrated effects upon safety and way of life, as informed by the assessments of the social impact experts and lay evidence submitted.

18. Significant adverse effects require consideration of alternatives pursuant to Schedule 4 of the RMA, which has not been done in my opinion. A credible alternative to accommodate the same number of persons demanding housing whilst preserving Fenton Street for its planned purposes pursuant to the operative and proposed RLDP has been identified, by considering capacity off Fenton Street. This alternative, combined with reduced durations to better match plan-enabled ability to deliver housing and expected substantial increase in international tourism numbers through to 2024, would reduce the magnitude of adverse effects and inconsistency with relevant objectives and policies.
19. As the applications stand, and based on observations at site, I am of the view the activities in the operative Commercial 4 Zone – City Entranceway Accommodation are Non-Complying in terms of activity status and, with respect to Fenton Street sites, fail to pass either of the limbs of the gateway test at s104D of the RMA. In respect of objectives and policies, this is owing to the direction of specific objectives to support the nationally-significant tourism industry within Rotorua, which the applications at Fenton Street sites do the exact opposite of. The applications are also contrary to Plan Change 9 objectives and policies for high-density residential uses in Commercial zones.
20. I am of the view that there are grounds for refusal of the applications at Fenton Street sites pursuant to the consideration of actual and potential effects, in light of possible alternatives; the consideration of relevant RMA planning documents; and other relevant matters including the direction of other planning documents and strategies, and precedent and plan integrity, pursuant to ss104 and 104D of the RMA.

## Overview of the Application Sites

21. The application sites' locations and zoning under the Operative Rotorua Lakes District Plan (RLDP) are summarised in the s42A Overview report<sup>3</sup>. I agree with this summary and the relevant zones underlying each site.
22. Six of the application motels are accessed from Fenton Street, being a dual-carriageway Urban Primary Arterial Road under the RLDP Urban Road Hierarchy. The other application motels are located on Sala Street and Lake Road (Urban Primary Arterial), Malfroy Street (Urban Secondary Arterial), Ward Avenue (Urban Collector), Meade Street and Tryon Street (unclassified roads).
23. Distinctions I would emphasise in respect of the existing character surrounding certain application sites, referred to later in this evidence, are as follows:
  - (a) Fenton Street has an overwhelming dominance of tourism accommodation, reflective of its underlying Commercial 4 City Entranceways Accommodation zoning. The Lake Motel at 131 Lake Road has the same zoning.
  - (b) The above two locations are observed as being served by high-traffic roads within the Rotorua context.
  - (c) The sites of Apollo Hotel, New Castle Motor Lodge, and Union Victoria Motel, are served by roads distinctly lower in traffic, at or near the interface of residential areas and the Fenton Street accommodation corridor.
  - (d) Ann's Volcanic Motel is located in a distinctly residential environment.

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<sup>3</sup> Table under paragraph 47 of the s.42A overview report dated 22<sup>nd</sup> September 2022.

- (e) The Alpin Motel is located on State Highway 30.
- (f) The Pohutu lodge is located on a short cul-de-sac.
- (g) The Apollo Hotel is located in very close proximity to Whakarewarewa Living Maori Village, a high-profile tourist attraction within Rotorua.

### **Proposed Development**

24. The scope of the proposed development is covered in the evidence of Mr Batchelar and Ms Blackwell. In summary, the motels are sought to be approved for a change of use to CEH purposes, to provide an interim solution for persons in need of EH. I acknowledge the reasons for the applications, being primarily attributable to population growth in Rotorua between 2013 and 2021, with increased demand for housing corresponding to increased purchase and rental price points for housing, as detailed by the expert economists. It is noted however that not all persons being accommodated in CEH sites in Rotorua are from Rotorua<sup>4</sup>.
25. A distinction to be drawn is the intended duration of the proposed uses. Ms Blackwell states that a duration of five years is sought from the date of consents (if granted)<sup>5</sup>. CEH has been operating from 12 of the 13 application sites since July 2021, with the 13<sup>th</sup> site (Emerald Spa) commencing CEH use in July 2022<sup>6</sup>. The actual duration of use for CEH purposes, and duration of corresponding adverse effects, is obviously longer than five years accounting for the time already lapsed whilst in use as CEH without the benefit of resource consent. Actual duration will depend on the timeframe of any granted decision and passing of appeal period.

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<sup>4</sup> Paragraphs 10 and 12, Rotorua Emergency Housing Analysis – Report dated 13 April 2022 from the Ministry of Social Development to the Hon. Carmel Sepuloni, Minister for Social Development and Employment (Attachment 1).

<sup>5</sup> Paragraph 6.5 of the evidence of Alice Blackwell dated 5<sup>th</sup> October 2022.

<sup>6</sup> Page 1 summary of s.42A overview report dated 22<sup>nd</sup> September 2022.



26. There is therefore ambiguity as to the actual duration of the uses if consented, and associated duration of effects of the proposed uses.

### **Activity Status of Applications**

27. It is noted the consultant s.42A planners assert that the activity classification and status of the applications is Restricted Discretionary in the Commercial 4 Zone and are Non-Complying at all other sites. I agree with the rationale for reaching the Non-Complying Activity Status where identified.
28. In respect of the conclusion that the applications within the Commercial 4 Zone have the activity status of Restricted Discretionary, I agree with Ms Blackwell and Mr Batchelar's considerations of the activities against the definitions of 'tourism accommodation' and 'community housing'. I disagree with both insofar that the degree of supplied security and administrative services at some of the facilities as witnessed during recent site visits would be reasonably or legitimately 'subsidiary'<sup>7</sup>. These wrap-around services are discernible and distinct, and I would not consider such services to be 'subsidiary' i.e., naturally or routinely related or accompanying household unit occupation. I further note that 'household units' requiring more intense support services (which characterises the CEH operations in my view) are separately provided for by the RLDP (community housing, rest homes etc.). I therefore ultimately agree with the conclusion reached by Ms Blackwell that these applications should be afforded the activity status of Non-Complying as they are not provided for within the Commercial 4 Zone.

### **Relevant Statutory Planning Framework**

29. The relevant statutory planning framework is governed by s.104(1) of the RMA. Particularly relevant to the consideration of the collective applications are the following:

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<sup>7</sup> See Appendix 2 and paragraph 68 of the s.42A overview report dated 22<sup>nd</sup> September 2022.

- (a) Actual and potential effects, including consideration of alternatives (104(1)(a));
- (b) Proposed mitigation measures (104(1)(ab));
- (c) The provisions of the RLDP, in particular relevant objectives and policies (104(1)(b));
- (d) The provisions of Plan Change 9 to the RLDP (104(1)(b));
- (e) The National Policy Statement on Urban Development 2020 (NPS-UD) (104(1)(b));
- (f) Precedent and Plan integrity (104(1)(c));
- (g) Rotorua Long Term Plan 2021-2031 (104(1)(c));
- (h) Rotorua Destination Management Plan 2021 (104(1)(c)); and
- (i) Rotorua Spatial Plan (104(1)(c)).

30. These matters are assessed in turn below.

### **Environment as it Exists and Permitted Baseline**

31. Prior to assessing the effects of the proposal, it is considered prudent to consider the environment as it currently exists, and the permitted baseline, as they relate to the collective applications. Ms Blackwell captures Mr Batchelar’s consideration of these matters as well as her own at section 8 of her report.

32. I agree with Ms Blackwell that the starting point for the assessment should be the environment as it currently exists, and that *“ignoring the wider social and economic conditions that are being experienced as a result of a shortage of appropriate and affordable housing in Rotorua would be artificial”*<sup>8</sup>.

33. The environment as it exists across Rotorua at large therefore includes the existing EH uses across Rotorua in my view.

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<sup>8</sup> Paragraph 8.4, evidence of Alice Blackwell dated 5<sup>th</sup> October 2022.

34. The permitted baseline, in contrast, is development permitted at a site by the operative RLDP. Section 104(2) provides for the disregarding of effects of activities permitted by the plan.
35. It is noted that Household Units and Community Housing uses are only permitted activities in the operative Commercial 4 Zone – City Entranceway Accommodation where occupying sites at a ratio of one household unit per 450m<sup>2</sup> of net site area. Community Housing by definition is also restricted to an occupancy rate of eight persons across the District.
36. By comparison, there is no density restriction on accommodation units when provided as Tourist Accommodation in the operative Commercial 4 Zone. This speaks to primacy of Tourist Accommodation within the operative zone i.e. less constraints to establishment. This also speaks to the difference in appropriate amenity provision for Tourist Accommodation uses in comparison to permanent residential occupation.
37. The likes of Household Units and Community Housing have been considered by Ms Blackwell in the original site-specific applications, in terms of their comparability to the proposed uses as permitted baselines within the operative Commercial 4 Zone. Tourist Accommodation is permitted by the operative plan to a far more efficient degree than the likes of Household Units and Community Housing uses at the same sites. The credibility and likelihood of conversions to those permitted baselines (as currently permitted) within the Commercial 4 Zone is considered to be inherently questionable and fanciful.
38. On the matter of the permitted baseline, it is therefore firstly my opinion that the likelihood and credibility of street-fronting land to Fenton Street in particular, as well as Lake Road and Sala Street within the operative Commercial 4 – City Entranceways Accommodation Zone being converted to

currently permitted degrees<sup>9</sup> of Community Housing and/or Household Unit uses is low, for the reasons stated above in terms of efficiency of use. I therefore consider the permitted baseline to be fanciful in respect of all Commercial Zone 4 sites.

39. I secondly disagree with the common theme across the original applications that the effects of permitted Community Housing and/or Household Unit uses are similar to the proposed uses, primarily due to the increased intensity associated with using Tourist Accommodation facilities for EH. Adverse social impact, and amenity effects in particular occur as a result of CEH use of the sites, discussed later in this evidence.
40. It is therefore my opinion that no effects from the submitted permitted baselines in the original AEE's should be disregarded with respect to the potential to do so pursuant to s104(2) of the RMA. All effects of the proposed uses in conjunction with the effects occurring within the environment as it exists are relevant to consider in my opinion.

## **Actual and Potential Effects**

### *Cumulative Economic Effects*

41. The cumulative economic effects of the proposed conversions to CEH purposes in conjunction with those within the environment as it currently exists presents itself as an issue of high significance, given 56 of 146 accommodation establishments in Rotorua are being used for EH purposes<sup>10</sup>.

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<sup>9</sup> MDRS Plan Change 9 and associated changes to permitted development at the site are excluded from the benefit of immediate legal effect pursuant to s.86BA, as the proposed rules apply to a zone which is not currently a residential zone, and is thus a new residential zone. Confirmed at <https://letstalk.rotorualakescouncil.nz/housing-for-everyone-plan-change-9/widgets/382878/faqs>

<sup>10</sup> See figures of total establishments - Table 5 of Evidence of Natalie Hampson dated 5<sup>th</sup> October 2022, and Table 1 of Evidence of Kevin Counsell dated 11 October 2022.

42. Mr Counsell calculates that the impact of the 13 application motels being used for CEH purposes is likely to result in a total loss of \$31.4 million per year to the Rotorua economy<sup>11</sup>. This being 12% of direct total domestic tourism expenditure in Rotorua, a material amount. This translates to a total reduction in direct domestic tourism expenditure in the Rotorua economy of over \$188 million (in actual, undiscounted, value) over the duration of six years should all CEH facilities operate for at least that long.
43. I understand that, in broad terms, Mr Counsell's approach to calculating the \$31.4 million was to estimate the average spending per domestic visitor to Rotorua and to multiply this by the number of guests that would be lost from the application motels. Mr Counsell undertakes this calculation first for a single motel (the Pohutu Lodge Motel), and then extrapolates this to the 12 other sites, with necessary adjustments based on room numbers at each accommodation facility. I am advised by Mr Counsell that the occupancy rates utilised in deriving this figure are based on Accommodation Data Programme data collected by the Ministry of Business, Innovation and Employment. I consider the calculation to be credible.
44. These economic effects are attributable to the 13 CEH application sites only, being only 23% of the total of motels in the Rotorua environment which have been altered in use to EH purposes<sup>12</sup>. The total number of EH sites occurring at established accommodation sites is 38.4% of total accommodation options in Rotorua, this proportion being wholly or partly removed from the supply to the tourism market. This is a significant proportion of considerable value to the Rotorua economy (17% of Gross Domestic Product in Rotorua comes from tourism, compared to 6% nationally)<sup>13</sup>.
45. Ms Hampson considers that only a modest share of future guest arrival losses, and associated economic opportunity costs and lost expenditure as a result of

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<sup>11</sup> Paragraph 73 of Evidence of Kevin Counsell dated 11<sup>th</sup> October 2022.

<sup>12</sup> Paragraph 26 of Evidence of Natalie Hampson dated 5<sup>th</sup> October 2022.

<sup>13</sup> Paragraph 22 of Evidence of Kevin Counsell dated 11<sup>th</sup> October 2022.

reduced capacity, is attributable to the CEH proposals, highlighting only a 'minor' loss of 8% of stay units in Rotorua. Mr Counsell disagrees with this, because he finds that not all of the remaining 92% of stay units will be directly substitutable for the lost stay units of the 13 CEH applications.

46. The economic effects of 77% of the accommodation facilities which have been converted to EH use in Rotorua have not been captured, however can be reasonably assumed to follow in-principle the clear trend of reduced expenditure in comparison to tourists. This cannot be understated in my view – the figure of a \$188 million dollar loss to the Rotorua economy over six years is only accounting for the 13 proposed CEH sites. Considering the environment as it currently exists in terms of EH in Rotorua, this must be considered cumulatively and aggregately with a further (minimum) 43 motels also removing rooms from supply to the tourism market. The cumulative adverse economic effects of reduced Tourist Accommodation available for domestic tourism is therefore certainly greater than the aforementioned calculated monetary figures. Mr Counsell considers this to be significant adverse cumulative economic effects upon the economy of Rotorua.
47. It must be appreciated that such effects are occurring at a time of substantial loss of international tourism to Rotorua over two years owing to the Covid pandemic<sup>14</sup> which commenced at the start of 2020. International tourists spend 1.5x more than domestic tourists<sup>15</sup>, and reduced from over 20% of total visitors in Rotorua pre-Covid in January 2020 (monthly count of 120,000) to virtually none from April 2020 through to April 2021, and again from August 2021 to February 2022<sup>16</sup>.
48. I observe that all economic experts are in agreement that moving forward visitor numbers will increase towards pre-Covid levels – the only question between the economists is at what precise pace. As the pace of tourism to

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<sup>14</sup> Paragraph 62 of Evidence of Kevin Counsell dated 11<sup>th</sup> October 2022.

<sup>15</sup> Paragraph 69 of Evidence of Kevin Counsell dated 11<sup>th</sup> October 2022.

<sup>16</sup> See Figures 32A and 32B, Evidence of Natalie Hampson dated 5<sup>th</sup> October 2022.

Rotorua and New Zealand increases, so too does the scale of the opportunity cost of a loss of rooms on the market and higher prices per room of what remains available, which would reasonably influence decisions to travel to Rotorua. As previously cited, Mr Counsell has highlighted the 8% loss of stay units are not directly substitutable as like-for-like replacement standard of tourism accommodation.

49. Fundamentally there is disagreement between Ms Hampson and Mr Counsell in that Ms Hampson considers the effect of removing 8% of accommodation stay units to be minor. Mr Eaqub agrees with Ms Hampson's assessment<sup>17</sup>.
50. Ms Hampson's evidence appears, to my mind, to consider effects of the CEH uses in isolation<sup>18</sup>, on the basis of other EH being unlawful<sup>19</sup>. This is artificial in my view. Conversely, Mr Counsell has clearly considered this loss of tourism stay units collectively and in conjunction with the reduction of international tourism across the sought duration of CEH usage, indirect interrelated 'multiplier' economic effects on other business, and economic costs arising as a result of increased crime, in considering the overall degree of economic effects. Considering this cumulative consideration of all relevant contributing economic effects in my view, I therefore adopt the expert advice of Mr Counsell. Mr Counsell advises that the cumulative adverse economic effects, when considering also the effects of the existing EH uses in Rotorua in lieu of tourism accommodation in conjunction with the effects of the same at the CEH sites, are more than minor and significant<sup>20</sup>. The same effects of the CEH's uses alone or in isolation are considered to be more than minor by Mr Counsell.
51. The above demonstrates that there is a clear and significant adverse economic effect of the cumulative loss of Tourist Accommodation to Rotorua at large, to which the 13 CEH proposals contribute materially.

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<sup>17</sup> Paragraph 8.7, Evidence of Shamubeel Eaqub dated 5<sup>th</sup> October 2022.

<sup>18</sup> Paragraph 42, Evidence of Natalie Hampson dated 5<sup>th</sup> October 2022 – distinguishing/apportionment approach between CEH and other EH, when end cumulative effects are nonetheless relevant in my view.

<sup>19</sup> Paragraph 38, Evidence of Natalie Hampson dated 5<sup>th</sup> October 2022.

<sup>20</sup> Paragraph 9, Evidence of Kevin Counsell dated 11<sup>th</sup> October 2022.

52. For the reasons discussed above, and considering the expert opinion of Mr Counsell, I therefore consider the cumulative and aggregate adverse economic effects upon Rotorua at large to be at least more than minor and significant to the local economy over the minimum six year duration of CEH as sought.

### *Social Effects*

53. I consider particularly pertinent potential social effects to include impacts upon way of life, residential character, fears for safety, and community aspirations, to use the characterisations of Ms Healy.
54. I note a key point of difference between the two social impact experts Ms Healy and Ms Foy is the baseline starting point of assessing social impacts. Of overwhelming importance in my view is the apparent agreement between experts of magnified and more discernible negative social impacts where activity changes occur in concentration (i.e. along Fenton Street most prominently).
55. The evidence of Ms Healy on behalf of MHUD concludes *“CEH would result in some increases in positive outcomes and some increases in negative outcomes, such that overall it would not substantially change the existing social conditions for the wider community”*. Ms Healy does further acknowledge that *“negative impacts identified were assessed as more likely where CEH were clustered within close proximity to other forms of emergency and transitional housing and other contracted housing, due to increased likelihood of incidences and subsequent social impacts for the surrounding neighbourhood”* <sup>21</sup>. This is particularly the case along Fenton Street. Proof has been obtained of increased anti-social incidences (increased alcohol and drug incidents, and hospital admissions) at CEH addresses across 2021 and 2022 which coincides with the

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<sup>21</sup> Paragraphs 7.2 and 7.5, Evidence of Jo Healy dated 5<sup>th</sup> October 2022.



commencement of CEH use<sup>22</sup>. Anti-social and fear-inducing behaviour is also discussed at length in submissions and other evidence<sup>23</sup>.

56. Ms Foy clearly considers the cumulative and aggregate social impacts as added to by the proposed CEH usage of all motel sites, being appropriate in my view, given these are within the existing environment as previously discussed. Paragraphs 32 and 33 of her evidence are particularly insightful to the Fenton Street context, noting the significant concentration of CEH and other EH uses along Fenton Street which is supported by the economists' analysis of accommodation facility usage. Ms Foy posits that in light of the corresponding magnified adverse social impacts in greater concentration, some consents could be granted for certain CEH sites and not others. Declining consent is inferred to be on the basis of unacceptable degree of adverse social effects, where occurring in concentration such as that found in the Fenton Street context.
57. Other evidence submitted, including in respect of the Fenton Street corridor, by persons regularly residing in or Fenton Street, suggest an increased scale of adverse social effects concerning way of life, fears for and actual experiences of compromised safety, and the pre-EH and CEH residential character for the Fenton Street/Glenholme area in particular<sup>24</sup>, than estimated in Ms Healy's evidence. These speak to actual increases in experiences of crime and anti-social behaviour that has occurred alongside the transition of 34.8% of Rotorua's hotels to EH including the subject CEH uses. Actual changes in behaviour by a wide range of persons who represent the persons residing or routinely frequenting Fenton Street in particular, as a result of these social effects, are also documented in the evidence.

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<sup>22</sup> Te Whatu Ora response to LGOIMA request dated 14<sup>th</sup> September 2022 (Attachment 2).

<sup>23</sup> For example, see submissions of Gary Smith; Robert Parry, amongst others.

<sup>24</sup> See, for example, changes to way of life, ambition for the area, and responses to discernible increases in anti-social behaviour coinciding with EH use being increased in Rotorua since 2020, as detailed in submissions of Gary Smith; Trevor Newbrook; Marie Walsh; Richard Sewell; Robert Parry.

58. I infer from Ms Foy's evidence significant and unacceptable cumulative social impacts (as added to by the proposal) in concentration along Fenton Street, which is supported by the evidence of Ms Hampson<sup>25</sup>, lay evidence, and the two highest submission themes – behaviour of tenants and neighbourhood safety. For completeness, I consider cumulative adverse social effects in the same local area to be more than minor.

### *Traffic Effects*

59. There is evidence of disrupted berms and attempts to restrict mounting and parking on berms and footpaths, outside or in close proximity to proposed CEH sites. This is in addition to sighted unanticipated parking on berms. This suggests car parking provision is unable to be appropriately met or managed in the operation of CEH sites to date, with flow on adverse impacts to pedestrian thoroughfare. See **Images 1 and 2** below for illustration of these effects.



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<sup>25</sup> Paragraph 15, Evidence of Natalie Hampson dated 5<sup>th</sup> October 2022, regarding the concentration of EH in the Fenton Corridor having a cumulative effect on crime which has shifted from elsewhere in the District.

**Image 1:** Disturbed berm directly outside of, and placed rocks on opposite side of road to, Ann's Volcanic Motel, Malfroy Road.



**Image 2:** Multiple cars parked on berms behind Ascot on Fenton and Roto Vegas Motels (Toko Street frontage).

60. The street parking available for visitors in the event of overflow/excess visitor parking being demanded is first and foremost Fenton Street for the majority of Fenton Street motels. Accommodating such visitor movements commensurately increases vehicle movements to park and exit interacting with the live lanes of Fenton Street, a busy Urban Primary Arterial Road, creating additional adverse safety effects to the operation of the traffic network along Fenton Street.
61. Even with the on-site parking provided, and the proposed condition requiring a Site Management Plan to manage parking allocation for visitors, occupants and visitors may still choose to park on the berms as an easier short-term parking option than stop to open the security gates which are operating along the street frontages of several CEH sites.

62. In summary, there is also clearly a degree of adverse traffic effects that result from the sought CEH uses. The ability to internalise these effects through management plans proposed by recommended conditions of consent is not considered to be complete.

*Amenity including Health Effects*

63. Aside from the above social impacts to persons proximate to the proposed sites of CEH, which inherently affects the amenity of living in that environment, other adverse residential amenity effects of the proposals would result from the applications being granted. This is in respect of noise and disturbances as a function of the unpermitted higher density of units being occupied as Household Units. This is discernible and greater in comparison to the permitted baseline as previously defined in my evidence.
64. I consider this distinction to the permitted baseline to be the case in comparison to Tourist Accommodation and Community Housing uses for the following reasons:
- (a) The use of Tourist Accommodation is less permanent and frequent in character, or rather more transient. This is because tourism accommodation is typically used as a base and place of rest for tourists, travelling persons etc. in Rotorua to partake in other activities that have drawn them to Rotorua. As distinct from a base and place of residence more routinely and regularly occupied and receiving visitors.
  - (b) Community Housing by definition is restricted to eight persons at a site, whereas occupancies of up to 120 persons in EH accommodation at any one site is provided for in the applications<sup>26</sup>.

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<sup>26</sup> Table at paragraph 33 of s.42A overview report dated 22<sup>nd</sup> September 2022.

65. The assessment of Sarah Collins, Landscape Architect has been considered. This assessment finds that four of the six proposed CEH sites on Fenton Street contain unacceptable quality of play spaces available for children between the ages of 0 and 7, and the nearest play spaces are schools (where use is restricted during school terms). It is appreciated that the duration of occupancy of children in such facilities would be comparatively short in comparison to their overall formative years when play is particularly important, as discussed by Ms Collins. However, this is considered to result in a degree of adverse effects upon the health of younger children occupying the sites. It is appreciated this can be mitigated somewhat through conditions of consent requiring improvements, however this typically comes at the expense of on-site parking which then exacerbates effects on the on-street supply network.
66. The phenomenon of excess on-street parking discussed under traffic effects above generates clutter and an incongruous pattern of occupation within the berms of roads where this occurs (see **Images 1 and 2** above), generating adverse streetscape and character effects.

### *Conclusion – Effects*

67. Based on the assessment above, there is a combination of genuine and material adverse economic and social effects which, when considering the aggregate and cumulative scale of the effects of the CEH and other EH uses within the environment as it currently exists, I consider to be significant upon Rotorua at large (economic effects) and upon property owners, business tenants, and their customers, as well as general passing pedestrian public along the Fenton Street corridor (social effects). There are other adverse traffic, amenity and health effects that accrue from the proposed CEH uses. The positive effects identified by other experts are acknowledged however are not considered to outweigh the negative effects identified particularly upon the constituents of the Fenton Street corridor.

68. I consider the aggregate adverse economic effects, and concentrated adverse social effects, as added to by the proposed CEH use, to be more than minor. I consider the additional and cumulative adverse social effects upon person constituents of the Fenton Street corridor to be unacceptable.

### **Mitigation and Alternatives**

69. I note Ms Blackwell understands alternative consideration is not required<sup>27</sup>, however in expanding refers to 'alternatives' considered by Mr McNabb. I see no evidence of consideration of alternative methods or solutions to housing the persons requiring EH in Rotorua in other locations or by other means (i.e. alternative arrangements or sites with EH providers, special purpose vehicles/legislated routes etc.) in Mr McNabb's evidence.
70. My effects assessment above finds significant adverse cumulative effects exist. Pursuant to s.88 and Schedule 4 (Clause 6(1)(a)) of the RMA, alternatives consideration is required in such instances. This conclusion is reached cognisant of proposed conditions to mitigate effects, such as those concerning duration, landscaping improvements, removal of signage, and management and review of several effects. I therefore disagree with Ms Blackwell that alternatives consideration is not required, and am of the view that alternatives for addressing the reasons for the application should have been considered in accordance with Schedule 4 of the RMA.
71. Given the significant effects identified by various experts and as discussed above in respect of the Fenton Street corridor, and balancing this with the need for EH to be provided, a reasonable alternative in my view is the preservation of the Fenton Street sites for their planned purpose under the operative RLDP (City Entranceway Accommodation). Distribution of the demand requiring accommodation to motels not on Fenton Street and zoned Commercial Zone 4 to the likes of Residential zones is considered to be inherently more

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<sup>27</sup> Paragraph 9.28. Evidence of Alice Blackwell dated 5<sup>th</sup> October 2022.

consistent with relevant provisions of both zones and contexts, considering the dispersal of motels in the Residential zones and general lack of concentration in comparison to Fenton Street.

72. I recognise that emergency housing in-principle must be provided for by the planning system of any society, to appropriately cater to persons in such need. I have previously noted the fact that community housing is provided for to a degree as a permitted activity within the RLDP to meet demand in-principle. I also have previously worked with developers and Kainga Ora directly in my professional planning role to assist in supplying Kainga Ora with housing to meet such needs. I therefore fully appreciate alternative options to accommodate displaced demand must be found.
73. Ms Hampson's evidence discusses the potential for transferability of lost CEH demand elsewhere within Rotorua, considering there to be the potential for meeting and accommodating total demand transfer within Rotorua<sup>28</sup>. The alternative identified concerns only six of the thirteen CEH sites i.e. is not all of the CEH sites as considered by Ms Hampson.
74. Beyond Ms Hampson's evidence, Mr Counsell has specifically considered the ability for existing EH sites not in the Fenton Street corridor to be able to accommodate the demand to be transferred. This is confirmed as feasible in his estimate<sup>29</sup>.
75. I am also of the view that further mitigation of the longevity of identified adverse effects, in the form of specific, certain and shorter durations of consent is warranted. To this end, the general suitability of the sites for temporary CEH purposes have been considered, with a consent duration of one, two or three years from the date of consent recommended. The suitability of the sites and the reasons for the longer and shorter durations is further

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<sup>28</sup> Paragraph 219, Evidence of Natalie Hampson dated 5<sup>th</sup> October 2022.

<sup>29</sup> Paragraph 10, Evidence of Kevin Counsell dated 11<sup>th</sup> October 2022.

illustrated in the distinctions observed at the sites as discussed at paragraph 23 of this evidence.

76. Such an alternative would work as a form of ‘managed retreat’ occurring over several years, so as to coincide with securing more appropriate temporary and permanent housing solutions by MHUD to meet expected demand over a number of years since the issue has arisen.
77. The use of the identified alternative and the recommended mitigation in terms of durations of consent are summarised below:

<b>Resource Consent Number</b>	<b>Motel</b>	<b>Address</b>	<b>Term</b>
RC17647	Lake Rotorua Motel	131 Lake Road, Rotorua	1 year
RC17648	Alpin Motel	16 Sala Street, Rotorua	3 years
RC 17650	New Castle Motor Lodge	18 Ward Street, Rotorua	3 years
<del>RC17662</del>	<del>Malones Spa Motel</del>	<del>321 Fenton Street, Rotorua</del>	N/A decline
RC17661	Pohutu Lodge	3 Meade Street, Rotorua	2 year
RC17673	Union Victoria Motel	26/28 Victoria Street, Rotorua	2 years
<del>RC17887</del>	<del>Ascot on Fenton</del>	<del>247 Fenton Street &amp; 12 Toko Street, Rotorua</del>	N/A decline
<del>RC17889</del>	<del>Roto Vegas Motel</del>	<del>249-251 Fenton Street &amp; 14-16 Toko Street, Rotorua</del>	N/A decline
RC17890	Midway Motel	293 Fenton Street, Rotorua	N/A decline
RC17891	Geneva Motor Lodge	299 Fenton Street, Rotorua	N/A decline
RC17892	Ann’s Volcanic	107 Malfroy Road, Rotorua	3 years
RC17893	Apollo Motel	7 Tryon Street, Rotorua	1 year
<del>RC18244</del>	<del>Emerald Spa Motor Inn</del>	<del>284-286 Fenton Street, Rotorua</del>	N/A decline



78. The durations considered generally correspond to times where predicted increases in international tourists to pre-Covid levels (82-85% by May 2024)<sup>30</sup>, in addition to domestic demand, would likely see material demand for hotel use in the Commercial Zone 4 City Entranceways zone along Fenton Street.
79. The timeframes also provide reasonable time for building dwellings more densely and intensively as now permitted in Residential Zones 1 and 2 in Rotorua by way of Plan Change 9 (giving effect to Medium Density Residential Standards). It is noted that plan-enabled housing capacity has more than tripled in these zones as a result of Plan Change 9<sup>31</sup>. These provisions are expected to enable a more rapid delivery of dwellings in Rotorua to meet the housing needs currently being addressed by EH and CEH.
80. A further alternative to address the issue driving the applications is to consider where demand for CEH should exactly be accommodated. This is observed as the subject of much debate amongst a wide range of stakeholders and interested parties, receiving conspicuous media coverage. Information has been received from the Ministry of Social Development and Employment, suggesting at least 12% (135 persons) placed in CEH in Rotorua have stronger links to and support within other areas of New Zealand<sup>32</sup>.

### **Provisions of Operative Rotorua Lakes District Plan**

81. Considering the significant aggregate economic effects of the uses cumulatively with existing EH in Rotorua upon tourism, and the overlap with significant adverse social effects identified upon the Fenton Street corridor, the relevant provisions of the Commercial 4 Zone – City Entranceways Accommodation applying to that environment are considered in this evidence.

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<sup>30</sup> Tourism Export Council NZ forecasts, as discussed at paragraph 229, Evidence of Natalie Hampson dated 5<sup>th</sup> October 2022.

<sup>31</sup> Paragraph 66, Evidence of Natalie Hampson dated 5<sup>th</sup> October 2022.

<sup>32</sup> Rotorua Emergency Housing Analysis – Report dated 13 April 2022 from the Ministry of Social Development to the Hon. Carmel Sepuloni, Minister for Social Development and Employment.

82. Objectives and policies of relevance are identified below, with an assessment comment as to consistency of the proposals as lodged included directly below each provision.

<b>COMZ-O1</b> (6.3(1))	A hierarchy of vibrant compact commercial and tourism centres that efficiently service and support the needs of the surrounding community and nationally significant tourism sector. <i>Policies COMZ-P1 to COMZ-P5</i>
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83. **Assessment:** Granting the applications within the Commercial 4 Zone would be directly contrary to this objective, diminishing the potential to support the nationally significant tourism sector based in Rotorua, at a most sensitive time for that industry, in a location that is specifically planned for that purpose.

<b>COMZ-O2</b> (6.3(2))	Commercial activities that do not adversely affect the character, safety and efficiency of commercial areas. <i>Policy COMZ-P6</i>
<b>COMZ-O3</b> (6.3(3))	Commercial buildings and activities designed and operated in a manner that avoids adverse effects on the amenity of residential zones. <i>Policy COMZ-P7</i>

84. **Assessment:** The activities are not commercial activities yet are sought to be located in the Commercial 4 Zone. The activities significantly affect the established Tourist Accommodation and ancillary services character of Fenton Street, by way of introducing high-intensity residential accommodation. This being a use considerably different to the specifically-planned use of the sites, with proven adverse safety and social impacts to business owners, customers, guests and the passing public of the Commercial 4 zone. This use is particularly unsafe to accommodate along Fenton Street, in that additional safety risks are generated in terms of accommodating visitor parking and relying on play spaces adjacent to an Urban Arterial Road where children can reasonably easily escape to and come into conflict with, as observed during a recent site visit.
85. The sought use of the proposed sites would not avoid adverse effects on the amenity of residential zones, with adverse social impacts, and effects in

respect of noise and general disturbance (function of intensity of use) and streetscape (function of parking demand) also identified.

<b>COMZ-O4</b> <i>(6.3(4))</i>	Efficient use and development of commercial centres by the establishment of activities consistent with the intended purpose of each zone. <i>Policies COMZ-P8 to COMZ-P9.</i>
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86. **Assessment:** This objective and policy is intended to apply to commercial activities seeking to establish in Non-Commercial zones. However, its substance is entirely relevant to the matter being considered. The activities are clearly not consistent with the intended purpose of the Commercial 4 Zone.

<b>COMZ-O5</b> <i>(1.3.1(i))</i>	Subdivision, use and development that enables the continued efficient operation of existing development and activities. <i>Policy COMZ-P10.</i>
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87. **Assessment:** The residential use would not avoid reverse sensitivity effects, noting that occasional conferences generating noise and coming and going of persons and traffic late into the evenings would be permitted and lawful activities when occurring at tourism accommodation venues in the Commercial 4 Zone. Similarly, restaurants are permitted. Both uses have the potential to be subject to reverse sensitivity hindrances and complaints from intense residential neighbouring or nearby uses.
88. The same conclusion is made in respect of consistency or otherwise with Policy COMZ – P10.

<b>COMZ-P4</b> <i>(6.3(1)(b))</i>	<b>Entranceway Accommodation and Tourism</b> Provide for the development of tourism enterprises and Māori cultural experiences that maintains or enhances the amenity and vibrancy along the northern and southern city entranceways to the inner city, as shown on Planning Map 206.
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89. **Assessment:** It is noted tourism enterprises are not defined in the RLDP. This term is considered to logically extend to tourism-related businesses such as accommodation facilities, being enablers of tourism. The proposal would be contrary with this objective and policy, detracting from and removing the potential for maintenance and development of Tourist Accommodation, with

corresponding adverse effects upon the vibrancy of the southern city entranceway of Fenton Street. This would be further adversely affected by the loss of motel signage and landscaping measures proposed as conditions of consent.

90. Primacy of use in the operative Commercial 4 Zone – City Entranceways Accommodation, as informed by its description, is to provide for Tourist Accommodation. This would not occur, with the loss of facilities for that purpose being directly contradictory to that primary purpose.
91. The proposal would clearly fail to deliver an increase in amenity and safety in the commercial corridor of Fenton Street, and has delivered an increase in crime and damage to date to public property at least, as discussed elsewhere in this evidence. The proposals therefore fail to deliver anticipated environmental results COMZ-AER5 and COMZ-AER6.

#### **Provisions of Rotorua Lakes District Plan – as modified by Plan Change 9**

92. Plan Change 9 enables housing at comparatively higher density to that typical in Rotorua to be delivered in residential and commercial zones. Pursuant to s104(1)(b)(vi), the provisions of the proposed plan are a relevant consideration. Plan Change 9 is at the very start of the plan change process, with the submission period remaining open at the time of completing this evidence. The objectives and policies of the plan change are therefore afforded low weight. Proposed rules do not have legal effect in commercial zones.
93. Plan Change 9 amends the description of the City Entranceways Zone to provide for “*tourism accommodation and high density residential concentrated along city entranceways and arterial routes such as Fenton Street and Lake Road*”. There is an acknowledged shift from sole primacy of Tourist Accommodation to dual primacy of Tourist Accommodation and high density residential.

94. Plan Change 9 does not propose to alter COMZ-01 from its operative wording. Therefore for the reasons stated above in respect to the current provision, I find the proposal to be contrary to this objective.
95. Objectives COMZ-02 and O3 are amended by Plan Change 9, with an additional O3A also inserted, as below:

<b>COMZ-02</b> (6.3(2))	Commercial <u>buildings and</u> activities <del>that do not adversely affect</del> <u>positively contribute to the mixed use</u> character, safety and efficiency, <u>and attractiveness</u> of commercial <del>areas</del> <u>centres and entranceways to Rotorua</u> . <i>Policy COMZ-P68 to COMZ-P9</i>
<b>COMZ-03</b> (6.3(3))	Commercial buildings and activities designed and operated in a manner that <del>avoids</del> <u>mitigates</u> adverse effects on the amenity of residential zones. <i>Policy COMZ-P710 to COMZ-P11</i>
<b>COMZ-03A</b>	<u>Residential development provides healthy, safe, and quality living environments for residents.</u>

96. **Assessment:** For reasons as previously discussed in this evidence, the CEH uses detract from the social wellbeing and experience in the mixed-use character of the motel environments. Increased fears for safety and experiences of anti-social behaviour and unlawful behaviour are occurring. There are increased safety risks to children playing in car parks and in close proximity to busy roads. The proposals, enhanced by the conditions of consent for blended landscaping, certain fencing types, and removal of motel signage, actively detract from the Fenton Street entranceway to Rotorua. I would not agree with a conclusion that the uses are providing healthy, safe and quality living environments, particularly along Fenton Street. Problems accommodating visitor car parking demand and increased risks to the safety of operation of Fenton Street have been identified. Overall it is my opinion the sought CEH residential uses negatively detract from, rather than positively contribute to, the character, safety, efficiency and attractiveness of the commercial area surrounding and accommodating the entranceway of Fenton Street. I therefore find the proposal contrary to these objectives.
97. The policies supporting these new or modified objectives, do not water-down the requirement for healthy, safe and quality living environments. Rather, they

further quantify them by requiring, inter alia, *“to maximise pedestrian amenity and safety”* (COMZ-P12) and *“achieve quality on-site living environments for people by providing private open space...safe and convenient pedestrian access”* (COMZ-P13). The social impacts upon way of life to ordinary pedestrians along Fenton Street, lack of suitable-quality private open space for residents, has been previously documents and in short is not considered to be provided. The sliding gated entrances to many of the sites, at the control of security when accessing from Urban Primary Arterial Roads such as Fenton Street, is not considered to be convenient.

98. In summary, the proposals do not deliver ‘quality’ high-density residential environments, rather the opposite, in my view.

#### **Conclusions – Consistency with Provisions of Operative and Proposed Rotorua Lakes District Plan**

99. I acknowledge that fixed durations to ensure a temporary nature of the CEH uses of the sites is proposed, reducing the permanency of the proposed uses.
100. I note Mr Batchelar concludes that owing to his assessed Restricted Discretionary activity status of the applications within the Commercial 4 – City Entranceway Accommodation Zone, he progresses to find the proposed uses in that zone ‘not contrary’ to the operative objective COMZ-O1, on the understood basis of a degree of expectancy by a plan of Restricted Discretionary activities. I have earlier advised of reasons for disagreeing with that activity status conclusion.
101. Notwithstanding a temporary duration, I am of the view the proposal would be contrary to specific operative objective COMZ-O1 in that the proposals do the exact opposite of what is expected – rather than supporting the nationally-important tourism sector within Rotorua as expected at the zoned sites, the developments would actively remove the potential to do so, at a sensitive time

for tourism industry. The proposal would also be contrary with COMZ-P4 and the direction to provide for safety within commercial areas.

102. The proposed plan provides for dual primacy of Tourist Accommodation and quality, safe high-density residential housing. The requirements for high-density housing as directed by proposed objectives and policies would be directly contravened and inadequately met by the quality delivered at CEH sites along Fenton Street, contrary to COMZ-O2, COMZ-O3A, COMZ-P12 and COMZ-P13.
103. I am therefore of the view that the proposal will be contrary to the objectives and policies of the specific planned purposes of the operative City Entranceway Accommodation and as modified by Plan Change 9, of sufficient importance to the zone and plan overall so as to be contrary to the operative and proposed plans.

#### **NPS – UD**

104. The National Policy Statement for Urban Development (NPS-UD) 2020 sets out the objectives and policies for planning for well-functioning urban environments under the RMA.
105. Objective 1 of the NPS-UD seeks to ensure that New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.
106. Policy 1 of the NPS-UD states that as a minimum, a well-functioning urban environment includes good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport.

107. I agree with the s42A overview report by Mr Batchelar in that provision of EH is a necessary component of meeting the specific housing need at the centre of the applications, but should be implemented in a manner that is not detrimental to other people and communities being able to provide for their social, economic, and cultural wellbeing.
108. I disagree with Mr Batchelar's finding that the Fenton Street corridor provides a location for CEH that has many of the qualities of a well-functioning urban environment.
109. The CEH facilities proposed on Fenton Street concentrates the activity along this important tourism accommodation corridor, detracting from the ability for other people and communities within the industry planned and existing at these sites to provide for their wellbeing, over an important time of recovery post-Covid 19.
110. The clients using CEH are described as "*families and whanau with children, Rangatahi/young people, and disabled people*"<sup>33</sup>. Some of the CEH applications also refer to vulnerable individuals such as kaumatua and kuia. The accessibility for occupants such as young children and vulnerable individuals of the CEH sites on Fenton Street is not safe due to the function, features and character of the corridor.
111. As Fenton Street is a Primary Arterial Road, with a dual carriageway (four lanes in total along much of the carriageway), the volume of traffic is high. During the site visit, children were witnessed exiting one of the application sites on Fenton Street (as the security gate was open) and playing on the road berm. It is generally observed there is relatively ease of access to and escape for curious children to Fenton Street.

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<sup>33</sup> Paragraph 35, s.42A overview report dated 22<sup>nd</sup> September, 2022.



112. No controlled pedestrian crossing facility is available to cross Fenton Street in close proximity from any of the CEH application sites on Fenton Street, with the nearest controlled pedestrian crossing located at the intersection of Fenton Street and Amohau Street to the north. From the southern-most application site on Fenton Street, this is approximately 1.4km away or a 20 minute walk.
113. There is a supermarket and other services on the eastern side of Fenton Street directly opposite the northern-most CEH application site on Fenton Street, (being the closest large supermarket to all of the application sites on Fenton Street) meaning that it is highly likely that occupants of the sites on Fenton Street will choose to attempt to cross Fenton Street directly outside the sites rather than walk to the aforementioned intersection.
114. While Fenton Street has bus services available and stops on both sides, to access many of the southern-bound services requires crossing Fenton Street to the eastern side. Conversely, accessing any northern-bound services would require crossing to the western side of Fenton Street.
115. There is a marked shared cycle/walkway along the eastern side of Fenton Street, but the western side does not appear to have this same facility.
116. I disagree with the s.42A finding that the level of accessibility is a mitigating factor for some of the site constraints, as pertaining to the sites on Fenton Street, for the reasons as stated above in respect of crossing Fenton Street to access public transport.
117. For the reasons stated above, there is inconsistency with the NPS-UD in respect of delivering a well-functioning urban environment. The vulnerability and young age of persons residing at the sites means the proposal arguably reduces this quality along Fenton Street.

**Section 104(1)(c) – Other Matters – Rotorua Spatial Plan**

118. I acknowledge Ms Blackwell’s assessment of this strategic spatial plan sitting alongside RMA plans, and the direction within it for Fenton Street to be transformed in the longer term to housing. This plan has a longer-term horizon of 30+ years<sup>34</sup>. Addressing more contemporary planning requirements is the Long Term Plan (discussed below) and Plan Change 9 to address housing shortages. Plan Change 9 does not preclude the delivery of the Rotorua Spatial Plan across its intended horizon, however does make clear the requirement for any housing is suitably high quality and safe. Such an outcome is not considered to be achieved by the applications. Considering also the applications are sought for five years as stated by the applicant, against the long term horizon this plan is not considered to weigh heavily within the considerations of s104 and determining the consent applications, in my view.

**Section 104(1)(c) – Other Matters – Rotorua Long Term Plan and Rotorua Destination Management Plan**

119. The Rotorua Long Term Plan (LTP) sets the direction of Council expenditure, based on the community outcomes desired, over the course of the next 10 years (notably shorter than the 30+ years of the Rotorua Spatial Plan). The latest plan was produced in 2021, being updated every three years. The plan is key to funding Council-led projects and works, and is an enabling plan formed under the Local Government Act 2002. It sits alongside the development-planning and resource-management focus of District/Regional/Unitary plans prepared under the RMA.

120. The Rotorua LTP acknowledges a place for emergency-use of motels for residential accommodation, but also acknowledges linked concerns with anti-social and criminal behaviour<sup>35</sup>. Its action commitments over the life of the

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<sup>34</sup> Page 11, Rotorua Spatial Plan.

<sup>35</sup> Pages 14-15, Rotorua LTP 2021-2031.

plan focus (in respect of housing shortage) on the delivery of 3000 homes in five years, developing the inner-city and regenerating several areas of the city<sup>36</sup>.

121. In respect of tourism, the LTP seeks re-state and strengthen tourism offerings to position Rotorua as the destination of choice, and overall engage in ‘regenerative’ tourism<sup>37</sup> i.e. respond and grow from the impacts of Covid-19. Granting consents to the concentration of sites zoned with a primacy to facilitate tourism accommodation along Fenton Street would diminish the potential to achieve this at this sensitive time recovering from the impacts of Covid-19, with tourism predicting to increase to over 80% of pre-Covid levels by May 2024.
122. The Rotorua Destination Management Plan is another strategic document to achieving the vision of Rotorua as ‘the most established and recognised tourism destination in Rotorua’. A strategic direction is ‘infrastructure that is important to the functioning of the destination will be in place and working for Rotorua’<sup>38</sup>. Granting consents to the concentration of sites zoned with a primacy to facilitate tourism accommodation along Fenton Street would diminish the potential to ensure this component of the strategy is in place.

### **Section 104(1)(c) – Other Matters – Precedent and Plan Integrity**

123. A decision to grant consent in the Commercial 4 Zone – City Entranceways Zone in a manner such as that proposed does not support tourism and delivers a low-quality inadequate housing product, being contrary to the specific and very relevant objectives of the operative Commercial 4 Zone – City Entranceway Accommodation, and as modified by Plan Change 9. This being in the face of an alternative to address the capacity of CEH required, without generating this outcome contrary to the direction of the RLDP. Granting the

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<sup>36</sup> Pages 14, Rotorua LTP 2021-2031.

<sup>37</sup> Page 16, Rotorua LTP 2021-2031.

<sup>38</sup> Strategic directions, page 4, Rotorua Destination Management Plan.

decisions along Fenton Street therefore would erode the integrity and strength of these objectives and policies, set a precedent for further diminishing of the effectiveness of the objectives and policies and overall public faith in the District Plan.

124. For the same reasons, there would be impacts upon the integrity of, and public faith in delivery on (to varying degrees), the Rotorua LTP and Destination Management Plan.
125. It similarly would 'open the door' for arguments as to acceptable quality of future high-density residential developments as envisioned by the notified Plan Change 9.
126. The integrity of the District Plan and Long Term Plan would likely come into question or disrepute if the adverse cumulative economic effects upon Rotorua at large as a result of a reduction in tourism, being one of strategic and high importance to the economic and social well-being of the District, is effectively considered acceptable by way of granting all recommended consents, in my view.

## **Part 2 Assessment**

127. Part 2 of the RMA contains the purpose and principles of the RMA. Considerations for decisions by consent authorities pursuant to s104 are had subject to Part 2. Part 2 is made up of sections 5-8.
128. I am of the same understanding as Ms Blackwell as summarised at paragraph 15.2 of her evidence in respect of further assessment against Part 2. I agree with Mr Batchelar that the RLDP is "*clear in its intention to permit only small-scale community housing activities without resource consent*".

129. I do not agree with Mr Batchelar that the RLDP is *incoherent* in its consideration of emergency housing; the permitted amounts are just smaller than what is currently being demanded<sup>39</sup>. By extension, I do not agree with notion suggested by Ms Blackwell that the plan does not provide direction about where and at what scale emergency housing may be appropriate<sup>40</sup> – rather, the plan is clear that community housing (which incorporates EH) is permitted and therefore anticipated in Residential and Commercial zones, just to far less of a degree and intensity of use than what is being sought by the applications. I do not consider there to be a ‘gap’ in the RLDP in terms of provision for emergency housing, as implied by Ms Blackwell at section 11.5 of her evidence.

130. For completeness, I directly consider the requirements of Part 2 of the RMA below.

131. Section 5 reads as follows:

*The purpose of this Act is to promote the sustainable management of natural and physical resources.*

*In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while—*

*(a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*

*(b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*

*(c) avoiding, remedying, or mitigating any adverse effects of activities on the environment.*

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<sup>39</sup> See paragraph 99 of s.42A overview report dated 22<sup>nd</sup> September 2022.

<sup>40</sup> See paragraph 15.3 of Evidence of Alice Blackwell dated 5<sup>th</sup> October 2022.

132. **Assessment:** An alternative method has been identified which enables provision for the social, economic and health and safety of persons requiring EH, whilst also sustaining the potential of physical resources (tourism infrastructure along Fenton Street) so as to be available for the planned purpose of that resource. The alternative would have the simultaneous improved outcome in terms of the health and social wellbeing for the residents of Glenholme and businesses trading on Fenton Street. Given such alternatives do not appear to have been considered, I am not of the view that the purpose of the RMA is clearly and satisfactorily addressed by the applications.
133. I agree with the identification by Ms Blackwell and Mr Batchelor of relevant matters within sections 6 (matters of national importance), 7 (other matters) and 8 (Te Tiriti o Waitangi).
134. In respect of the relationship of Maori and their culture and traditions (s6(e)) including the exercise of kaitiakitanga and rangatiratanga (s.7(a) and s(8) – noting Te Tiriti o Waitangi principles include rangatiratanga to mana whenua, and the principle of partnership with, and active protection by, the Crown), I see no reasons why these traditions, cultural values and treaty principles could not be similarly exercised in accommodating persons demanding EH through the alternative suggested.
135. Both Ms Blackwell and Mr Batchelar identify the provisions at sections 7(c) (the maintenance and enhancement of amenity values), and 7(f) (maintenance and enhancement of the quality of the environment) as relevant. I agree. Both rely on conditions to mitigate adverse effects. Given alternatives have not firstly been considered in avoiding or reducing the significant adverse effects which detract from the amenity and the quality of the environment, as opposed to maintaining or enhancing as directed, I do not agree that these ‘other matters’ have been appropriately addressed.

136. I therefore am of the view that in the absence of alternatives consideration in relation to the significant adverse economic effects (upon Rotorua) and significant and unacceptable social effects (upon Fenton Street) to be generated which conflict with relevant requirements of Part 2, the proposal does not conclusively align with and achieve the purpose and principles of the RMA.

### **Sections 104 and 104D Conclusions**

137. Mr Counsell has advised of his expert opinion that the cumulative adverse economic effects of the proposed CEH uses alone are more than minor<sup>41</sup>. He has further advised that the cumulative adverse economic effects of the CEH uses in conjunction with EH elsewhere in Rotorua are significant<sup>42</sup>. I have previously stated the reasons for adopting Mr Counsell's expert advice whilst having regard to other expert economists' advice. The proposals fail to pass the first limb of the gateway test under s104D of the RMA, in my view (when considering any one application's economic effects in conjunction with the other simultaneously-sought applications and existing EH).

138. It is my professional opinion that adverse cumulative economic and social effects of the proposals in addition to the EH uses within the environment as it currently exists are significant, with social impacts upon the Fenton Street corridor being unacceptable. Other adverse effects result in respect of traffic, amenity, and health and safety also are generated. I acknowledge the positive effects identified by others however I am of the view the overall resulting effects are unacceptable in the Fenton Street corridor, as relevant to s104(1)(a) of the RMA.

139. I am of the view that the proposal is contrary to specifically relevant objectives and policies COMZ-O1 (operative and Plan Change 9) and COMZ-O2, COMZ-

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<sup>41</sup> Paragraph 103, Evidence of Kevin Counsell dated 11<sup>th</sup> October 2022.

<sup>42</sup> Paragraph 9, Evidence of Kevin Counsell dated 11<sup>th</sup> October 2022

O3A, COMZ-P12 and COMZ-P13 (Plan Change 9) applying to the Fenton Street sites. The Fenton Street proposals are therefore contrary to relevant objectives and policies of the plan and proposed plan in my view, and do not pass the second limb of the gateway test at s.104D of the RMA.

140. For completeness, it is my assessment and opinion that the applications pertaining to Fenton Street sites do not pass the gateway test at s.104D of the RMA, and therefore should be refused/would not be able to be granted.
141. I am also of the view that there is inconsistency with the NPS-UD. These degrees of inconsistency being relevant to s104(1)(b) of the RMA.
142. A precedent for clear and poorly justified departures from planned outcomes, with respect to a lack of alternatives being considered where required, and consequential questioning of the integrity of multiple planning documents, could result from granting of all consents (noting the recommendation that two are deferred pending further information) as recommended by the s.42A overview assessment. These being relevant matters in respect of s.104(1)(c) of the RMA.
143. For the above reasons, I do not agree with the conclusions reached by Mr Batchelar and Mrs Blackwell that the consents should be granted. To the contrary, for the same reasons I am of the view that there are grounds for the resource consent applications for the Fenton Street Commercial 4 Zone – City Entranceway Accommodation sites to be declined pursuant to considerations under ss104 and 104D of the RMA.

## **Conclusions**

144. I am of the view that the effects to be considered are those within the environment as it currently exists. This includes the existing EH alongside the



proposed CEH occurring in Rotorua city, with any adverse effects having to be considered cumulatively.

145. I consider there to be more than minor and significant adverse economic and social effects, with significant adverse economic effects to Rotorua city at large, and significant adverse and unacceptable social effects to the Fenton Street corridor, as a result of the proposals. I have drawn on the expert advice of economists and social impact specialists in coming to this conclusion.
146. Significant adverse effects require consideration of alternatives pursuant to Schedule 4 of the RMA, which has not been done. A credible alternative to accommodate the same number of persons demanding housing whilst preserving Fenton Street for its planned purposes pursuant to the operative and proposed RLDP has been identified. This alternative, combined with revised and shortened durations of CEH uses, would reduce the magnitude of adverse effects and inconsistency with relevant objectives and policies.
147. As the applications stand, and based on observations at site, I am of the view the activities in the operative Commercial 4 Zone – City Entranceway Accommodation are Non-Complying and, with respect to Fenton Street sites, fail to pass both limbs of the gateway test at s104D of the RMA.
148. I am of the view that there are grounds for refusal of the applications at Fenton Street sites pursuant to the consideration of actual and potential effects, in light of possible alternatives; the consideration of relevant RMA planning documents; and other relevant matters including other planning documents and strategies, pursuant to s104 of the RMA.



Vincent John Murphy

12 October 2022



# Report

**Date:** 13 April 2022

**Security Level:** IN CONFIDENCE

**To:** Hon Carmel Sepuloni, Minister for Social Development and Employment

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## Rotorua Emergency Housing Analysis

### Purpose of the report

- 1 This report introduces the analysis "Rotorua Emergency Housing Demand" and highlights the key insights from that analysis.

### Recommended actions

It is recommended that you:

- 1 **note** the contents of this report and the attached analysis "Rotorua Emergency Housing Demand" which describes context and drivers for Emergency Housing demand in the Rotorua District
- 2 **agree** to forward this report to the Minister of Housing

**Agree/Disagree**

PP

Viv Rickard  
Deputy Chief Executive  
Service Delivery

13/04/2022

Date

Hon Carmel Sepuloni  
Minister for Social Development and  
Employment

16/4/22

Date

## Background

- 2 Rotorua is a focus area for the Government because of its high level of housing need. Agencies have been working actively in Rotorua for some time. In late 2019 a place-based partnership was agreed between Rotorua Lakes Council (RLC), Te Arawa Iwi and government agencies.
- 3 The Rotorua Housing Taskforce was then established in late March 2021, made up of Rotorua Lakes Council, Te Arawa Iwi and officials from Te Tūāpapa Kura Kāinga– Ministry of Housing and Urban Development (HUD), MSD, Kāinga Ora and Te Puni Kōkiri. Police Officials and the Lakes District Health Board have also participated in some of the discussions.
- 4 On 13 May 2021, Ministers announced a range of immediate responses to the homelessness and emergency housing situation in Rotorua. This included:
  - HUD contracting specific motels to provide emergency accommodation and contracting additional wrap around support services to meet the needs of 200 families and whānau with children. Contracted Emergency Housing was established on 1 July 2021 in Rotorua to provide better support and outcomes for people living in Emergency Housing motels, particularly families and whānau with children. Currently 13 motels in Rotorua have been contracted by HUD and are housing around 250 households.
  - Implementation of Te Pokapū – a Rotorua Housing Hub to strengthen assessment and placement processes for clients and co-locate relevant services. Te Pokapū provides a single access point connecting people with the right contracted accommodation and providing advice on suitable commercial accommodation for those eligible for an EHSNG and support services in Rotorua. Agencies, Iwi and local providers are co-located with defined roles and responsibilities.
- 5 The Council remain interested in MSD data around who is staying in emergency housing in Rotorua. For example, there has been a persistent narrative over the last few years that the growing number of clients living in Emergency Housing in Rotorua has been driven by people from other parts of New Zealand moving to Rotorua.

## Key insights

- 6 The Rotorua District has experienced continued population growth since 2014, increasing house prices and rental prices, which combined with low levels of residential building consents, low incomes and high rates of benefit dependency have led to a high level of housing need in Rotorua.
- 7 While the Rotorua population is estimated to be 1.5% of the total New Zealand population, applications on the Public Housing Register from the Rotorua District account for 3.3% of all applications.
- 8 While the Public Housing Register in Rotorua has increased by almost 950 applications since October 2016, the number of active Public Housing tenancies has only increased by 161 (26%) tenancies, with 142 of these being provided by Community Housing Providers.
- 9 Around 250 families and whānau with children were prioritised to move from SNG funded Emergency Housing in to Contracted Emergency Housing. However there has been another increase in EH SNG use in Rotorua, with around 400 households being supported by Emergency Housing SNGs each month since September 2021.
- 10 There were 1,121 clients who entered Emergency Housing in Rotorua in 2021. We looked at their addresses one month before entering Emergency Housing and combined that data with manual investigation into client circumstances to determine that:

- 778 clients (69%) were already living in the Rotorua District TLA one month before entering Emergency Housing or had previously lived in the Rotorua District
  - A further 208 clients (19%) were living in one of the Neighbouring TLAs one month before entering Emergency Housing, where often supply of Emergency Housing is limited
  - The final 135 clients (12%) came from other TLA's across New Zealand or had an unknown address one month before their stay in Emergency Housing began.
- 11 This analysis shows that the vast majority of emergency housing special needs grant recipients in Rotorua are for clients from the Rotorua District or the surrounding areas. Of those who are not, around half were in Rotorua for family and whānau support. A lack of Emergency Housing Supply in neighbouring TLAs has also contributed to clients requiring Emergency Housing in Rotorua.
- 12 Of the 135 clients with an address from outside the Rotorua District TLA or a Neighbouring TLA one month before they entered Emergency Housing in Rotorua, case note investigation found that:
- 64 clients had family and whānau in Rotorua that they moved to be close to, many living temporarily with them before requiring Emergency Housing
  - 13 clients had returned home to nearby regions where their local Emergency Housing supply was unable to accommodate them and then moved to Rotorua
  - 10 moved to Rotorua for work opportunities, 8 clients were passing through and impacted by lockdowns, 9 had left prison or rehab and 2 clients had grants made in error
  - 9 clients had friends in Rotorua that they moved to be close to, again, with many temporarily living with these friends before requiring Emergency Housing
  - For 20 clients we were unable to establish a link to Rotorua during our investigations. However, this is not to say there is no link to Rotorua for these clients, it may just not have been recorded in client files.

## Next steps

- 13 MSD and other agencies remain closely engaged with Council and the Rotorua Housing Task Force in our efforts to implement a strengthened emergency housing approach. While Council is a key partner in the pilot's success it also has its regulatory position to consider.
- 14 RLC is currently considering options to ensure that motel use within its boundaries comply with the terms of the Resource Management Act, District Plan and other applicable regulation. It is possible that MSD or another agency may be named as a party to any proceeding.
- 15 MSD officials are available to discuss the content of this report should you require.

## Appendix

Rotorua Emergency Housing Demand – an analysis

REP/22/4/326

Author: <sup>s9(2)(a)</sup> [REDACTED], Principal Analyst, System Performance

Responsible manager: Fleur McLaren, General Manager System Performance, Strategy and Insights



# Rotorua Emergency Housing Demand – an analysis

## *Purpose*

The purpose of this analysis is to attempt to understand the drivers contributing to the demand for Emergency Housing in Rotorua. We also look at where clients staying in Emergency Housing in the Rotorua District have come from, and if they have not recently been living in Rotorua, what their connections are to the area.

## *Background*

Rotorua is a focus area for the Government because of its high level of housing need. Government has been working actively in Rotorua for some time. In late 2019 a place-based partnership was agreed between Rotorua Lakes Council, Te Arawa Iwi and government agencies. The Rotorua Housing Taskforce was then established in late March 2021, made up of Rotorua Lakes Council, Te Arawa Iwi and officials from Te Tūāpapa Kura Kāinga–Ministry of Housing and Urban Development (HUD), MSD, Kāinga Ora and Te Puni Kōkiri. Police Officials and the Lakes District Health Board have also participated in some of the discussions.

On 13 May 2021, Ministers announced a range of immediate responses to the homelessness and emergency housing situation in Rotorua. This included:

- HUD contracting specific motels to provide emergency accommodation and contracting additional wrap around support services to meet the needs of 200 families and whānau with children. Contracted Emergency Housing was established on 1 July 2021 in Rotorua to provide better support and outcomes for people living in Emergency Housing motels, particularly families and whānau with children. Currently 13 motels in Rotorua have been contracted by HUD and are housing around 250 households.
- Implementation of Te Pokapū – a Rotorua Housing Hub to strengthen assessment and placement processes for clients and co-locate relevant services. Te Pokapū provides a single access point connecting people with the right contracted accommodation and providing advice on suitable commercial accommodation for those eligible for an EHSNG and support services in Rotorua. Agencies, Iwi and local providers are co-located with defined roles and responsibilities.

MSD and HUD are continuing to engage with Rotorua Lakes Council. Some of the specific concerns from the Council include:



- compliance of motels (contracted and non-contracted) with the Resource Management Act 1991 and Building Act 2004. The Council are planning to take regulatory action over 2022
- suitability and safety issues with many of the backpackers and motels being used for emergency accommodation. For example, many have outdated fire systems and are not suitable for longer term stays
- mixed use of motels for tourists and EHSNG clients is seen to impact on both security and certainty for EHSNG clients
- concentration of motels along key streets.

The Council remain interested in MSD data around who is staying in emergency housing in Rotorua. For example, there has been a persistent narrative over the last few years that the growing number of clients living in Emergency Housing in Rotorua has been driven by people from other parts of New Zealand moving to Rotorua.

## Key Findings

### Drivers and Context

While the Rotorua population is estimated to be 1.5% of the total New Zealand population, the Rotorua District Territorial Local Authority (TLA) has higher levels of benefit dependency and Emergency Housing use and accounts for 3.3% of applications on the Public Housing Register, indicating higher levels of housing need in Rotorua.

The introduction of Contracted Emergency Housing in Rotorua temporarily decreased demand for Emergency Housing SNGs, but overall demand has remained high, with 9% of all Emergency Housing clients being situated in Rotorua.

Reasons for high demand for Emergency Housing in Rotorua are:

- Rotorua median rents growing at a faster rate than national rents
- House prices in Rotorua growing at a faster rate than national rates
- Higher levels of benefit dependency and of unemployment than the overall population
- Earnings at less than the national median
- Low levels of residential building consents
- Faster growth in applications on the Public Housing Register than national averages

Public Housing in Rotorua has increased by 161 tenancies in the last 5 years, primarily driven by Community Housing Providers, while the Public Housing Register has had an additional 950 applications in the same period.



## Where people are coming from

This analysis shows that the vast majority of emergency housing special needs grant recipients in Rotorua are for clients from the Rotorua District TLA or the surrounding areas. Of those who are not, around half were in Rotorua for family and whānau support.

There were 1,121 clients who entered Emergency Housing in Rotorua in 2021. We looked at their addresses one month before entering Emergency Housing and combined that data with manual investigation into client circumstances to determine that:

- 778 clients (69%) were already living in the Rotorua District TLA one month before entering Emergency Housing or had previously lived in the Rotorua District
- A further 208 clients (19%) were living in one of the Neighbouring TLAs one month before entering Emergency Housing, where often supply of Emergency Housing is limited
- The final 135 clients (12%) came from other TLA's across New Zealand or had an unknown address one month before their stay in Emergency Housing began.

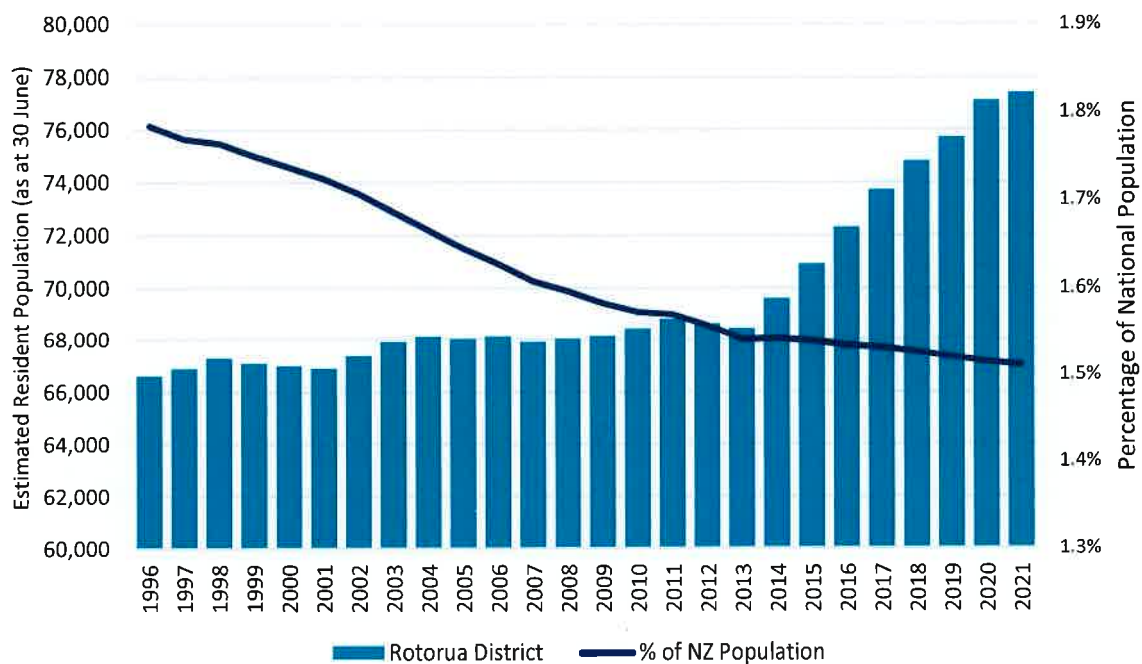
Of the 135 clients with an address from outside the Rotorua District TLA or a Neighbouring TLA one month before they entered Emergency Housing in Rotorua, case note investigation found that:

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- For 20 clients we were unable to establish a link to Rotorua during our investigations. However, this is not to say there is no link to Rotorua for these clients, it may just not have been recorded in client files.

## Rotorua Population and income demographics

The Rotorua estimated resident population has increased 7% between June 2016 and June 2021, after a long period of stability between 2003 and 2013. Rotorua growth has been slower than the total New Zealand population, as the percentage of the estimated New Zealand population in Rotorua has been decreasing. As at June 2021, it is estimated by Statistics New Zealand that the Rotorua population is 1.51% of the New Zealand total estimated resident population, down from 1.78% in June 1996.

**Figure 1: Estimated Resident Population for Rotorua District and the percentage of the total New Zealand population this is by year (30 June)<sup>1</sup>**



### Income and Employment

The average unemployment rate in the Rotorua District was 6.1% in December 2021. This was higher than the New Zealand Average of 3.8% and the total Bay of Plenty Region with a rate of 4.5%<sup>2</sup>.

MBIE estimates the mean annual household income in Rotorua for 2019 to be \$98,000 down 1.4% from \$99,400 in 2018. This is lower than the National mean household income of \$106,600 which had increased 2.1% in the same period, up from \$104,400 in 2018.

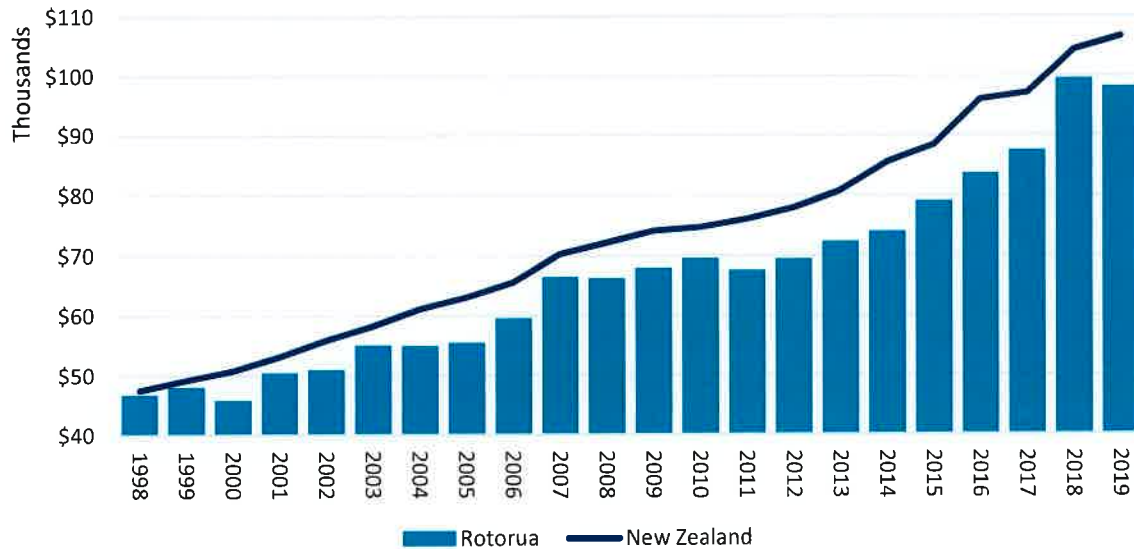
<sup>1</sup> Estimated Resident Population sourced from [Home | Stats NZ](#) March 2022

<sup>2</sup> [Quarterly Economic Monitor | Rotorua District | Unemployment rate \(infometrics.co.nz\)](#) March 2022



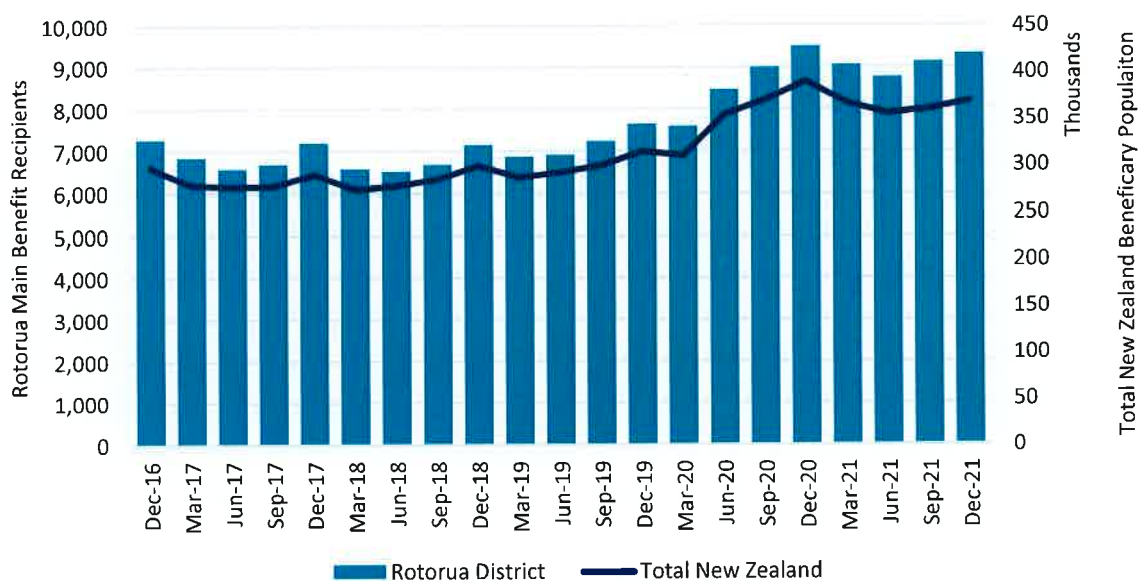


**Figure 2: Rotorua District and Total New Zealand mean annual household income<sup>3</sup>**



As at the end of December 2021, there were 9,303 benefit recipients in Rotorua. This accounts for 2.5% of the National Benefit population, meaning that Rotorua has higher levels of beneficiary assistance than proportionally is expected with 1.5% of the New Zealand population. This number included 5,313 recipients receiving Jobseeker Support, 2,208 receiving Sole Parent Support and 1,590 receiving Supported Living Payments.

**Figure 3: Rotorua District and Total New Zealand Main Benefit population<sup>4</sup>**



<sup>3</sup> Mean Annual Household Income sourced from [Regional economic activity report \(mbie.govt.nz\)](https://www.mbie.govt.nz) March 2022

<sup>4</sup> MSD benefit factsheets [Benefit Fact Sheets - Ministry of Social Development \(msd.govt.nz\)](https://www.msd.govt.nz)



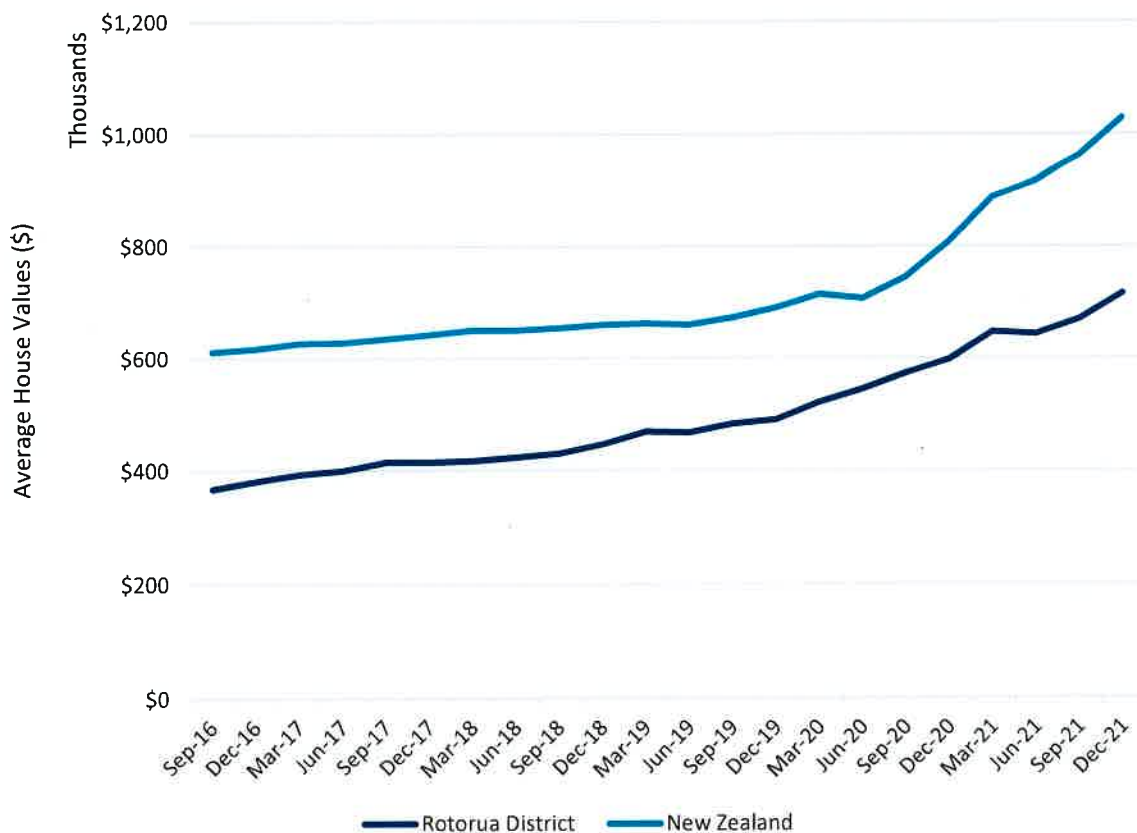
## Rotorua Housing and Rental Market

The 2018 New Zealand Census estimated there were 28,562 private dwellings in Rotorua, with an additional 99 under construction. It estimated that 25,236 (88%) of these dwellings were occupied<sup>5</sup>.

### House Values

While Rotorua house values have increased, as at the end of 2021 they are on average \$300,000 less than the National House price. Rotorua house prices have increased at a higher rate with Rotorua house prices sitting around 60% of National values at the end of 2016. This has increased with Rotorua houses now being valued at around 70% of the National house price.

**Figure 4: Average House Value by month, Nationally and for Rotorua District<sup>6</sup>**



<sup>5</sup> Statistics NZ [Place Summaries | Rotorua District | Stats NZ](#)

<sup>6</sup> Average House Value sourced from [www.infometrics.co.nz](http://www.infometrics.co.nz) March 2022

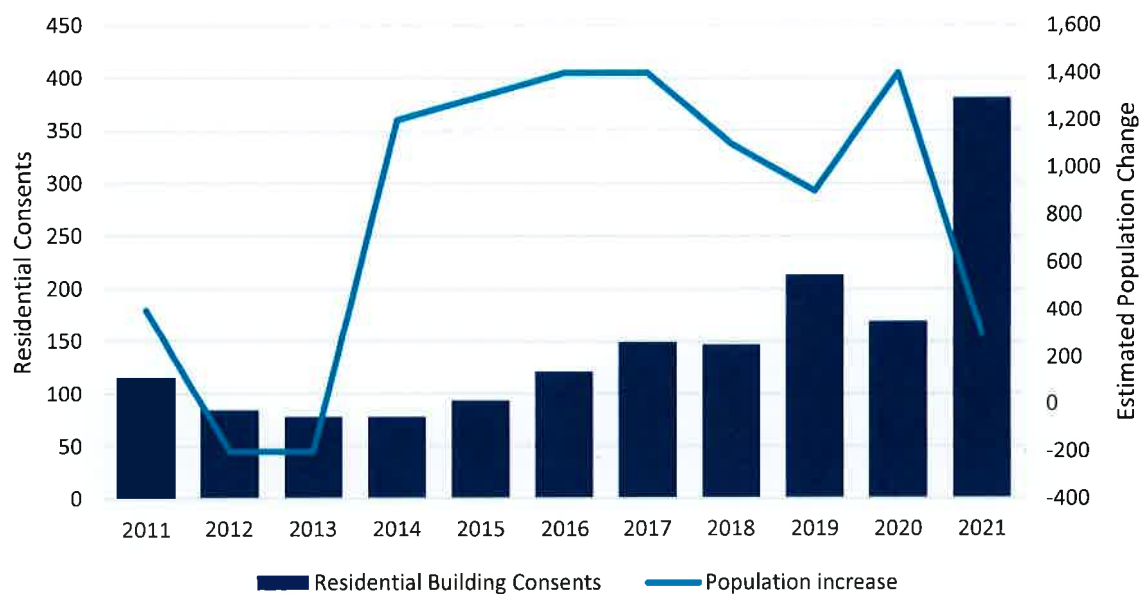


## Building Consents

It is estimated that Rotorua's population grew by 5,100 people in the last 5 years, while only 1,179 residential consents were issued in Rotorua District, with a large proportion of these consents being issued in the last 12 months.

There was a period of sustained population growth between 2014 and 2020 where Residential consents were low and did not increase at the expected rate to support the increases in population.

**Figure 5: Number of Residential Consents for Rotorua District and the Estimated Population Change<sup>7</sup>**



In 2021, there were a total of 48,899 residential consents granted across New Zealand, with only 381 (0.8%) being in the Rotorua District. While Rotorua consents increased in 2021, between 2016 and 2020 they only accounted for between 0.40 and 0.57% of total New Zealand residential consents.

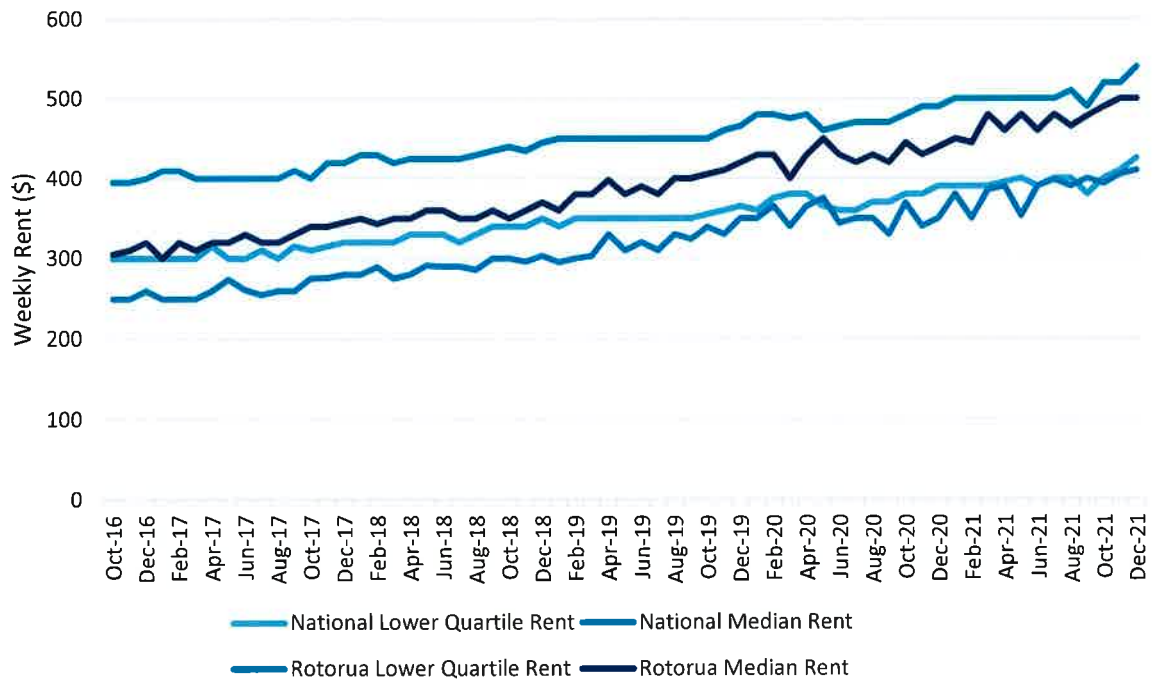
## Rental Market

Median and lower quartile rents in the Rotorua District have grown at a faster rate than National rents have for the last few years. This is shown in Figure 6, where the distance between the dark blue line and the dark teal line has narrowed as Rotorua rents have moved closer to the National rents. In 2016 Rotorua median rents were around \$100 less than the National median; this difference had reduced to between \$20 and \$40 for most of 2021.

<sup>7</sup> Residential Consents sources from Statistics NZ [Building consents issued: December 2021 | Stats NZ](#) March 2022



**Figure 6: Median and Lower Quartile Rent by month, Nationally and for Rotorua District<sup>8</sup>**



### Accommodation Supplement

Currently 2.4% of all Accommodation Supplement (AS) recipients are living in Rotorua. This equates to around 8,700 recipients in Rotorua, who on average are receiving almost \$78 a week towards their accommodation costs.

The increase in the weekly rates in 2018 was due to the changes to Accommodation Supplement as part of the Families Package. While the Rotorua District AS Area did not change (remaining at area 3), the maximum amount of Accommodation Supplement available to people in Rotorua did increase.

Between October 2016 and December 2021, the average weekly costs claimed by Rotorua clients for accommodation increased \$81 from \$221 to \$302. The increase in the maximum Accommodation Supplement rate means that the Accommodation supplement is still covering around 26% of clients' accommodation costs each week in Rotorua.

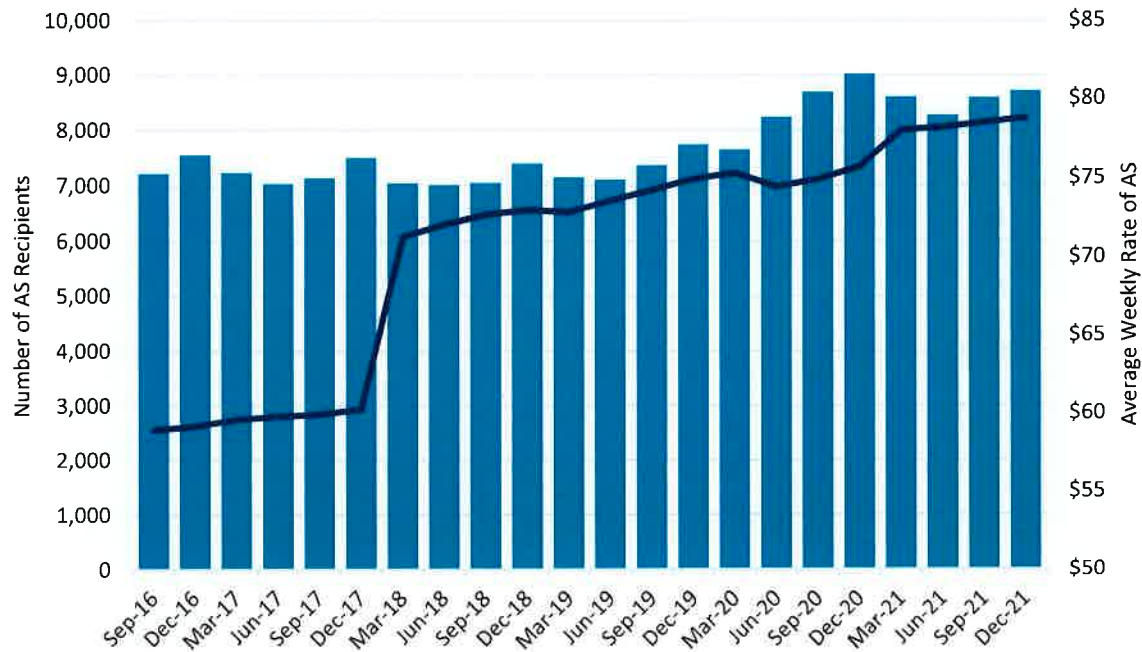
The quarterly trends in Accommodation Supplement recipients for the Rotorua District are very similar to the National trends, with both peaking at the end of December 2020. Rates of Accommodation Supplement always increase in December due to the increase in students receiving this assistance over the summer break, however the December

<sup>8</sup> Rental Data sourced from MBIE <https://www.tenancy.govt.nz/about-tenancy-services/data-and-statistics/rental-bond-data/> March 2022



2020 peak was much higher than expected due to the impacts of COVID-19 and the economy.

**Figure 7: Number of Accommodation Supplement Recipients and average weekly rate for Rotorua District**



## Public Housing Register, Tenancies and Numbers being Housed

### The Public Housing Register

The number of applications on the Public Housing Register in Rotorua has increased significantly. Between October 2016 and February 2022, the number of applications increased from 85 to 1,064 applications, a 1152% increase. Nationally in the same period the Public Housing Register increased from just over 6,000 applications to 31,654, an increase of 421%.

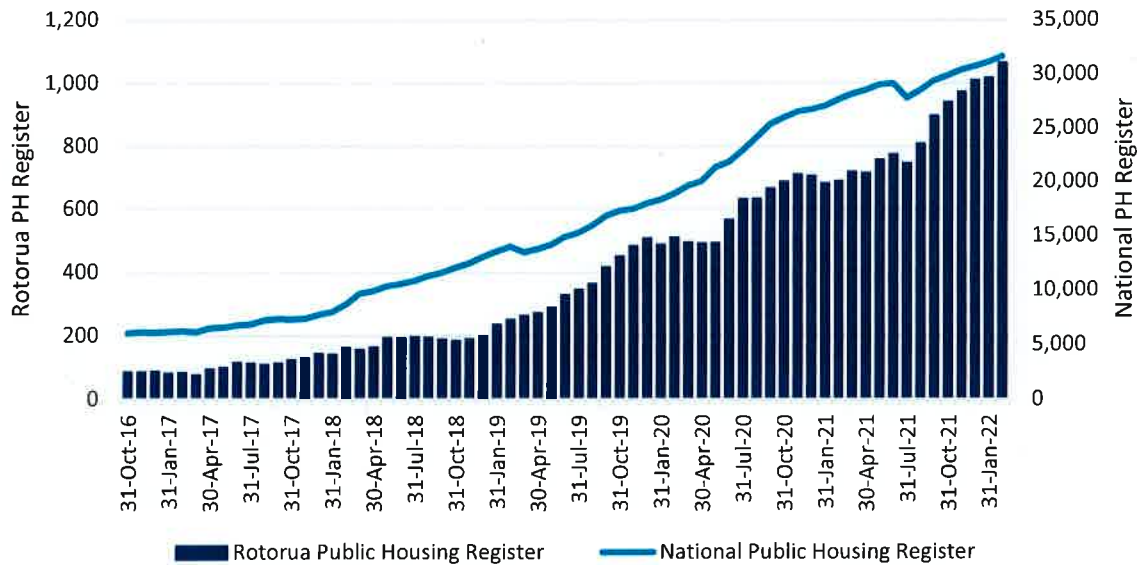
In Rotorua, 96% of applications on the Public Housing Register are on the Housing Register, with only 4% on the Transfer Register. Nationally 17% of the Public Housing Register are on the Transfer Register.

While Rotorua accounts for an estimated 1.5% of the New Zealand population, Rotorua based applications made up 3.3% of the Public Housing Register at the end of 2021.

In general, the level of need in Rotorua is higher than the national level with 69.4% of applications in Rotorua, as at 28 February 2022, having a priority rating of A20-A15, compared to the national level with 52.3% of applications being priority A20-A15. There are very few applications in Rotorua with a B priority, only accounting for 1.6% of applications, compared to the national level of 8.2% of applications.



**Figure 8: Number of Applications on the Public Housing Register Nationally and for Rotorua by month**

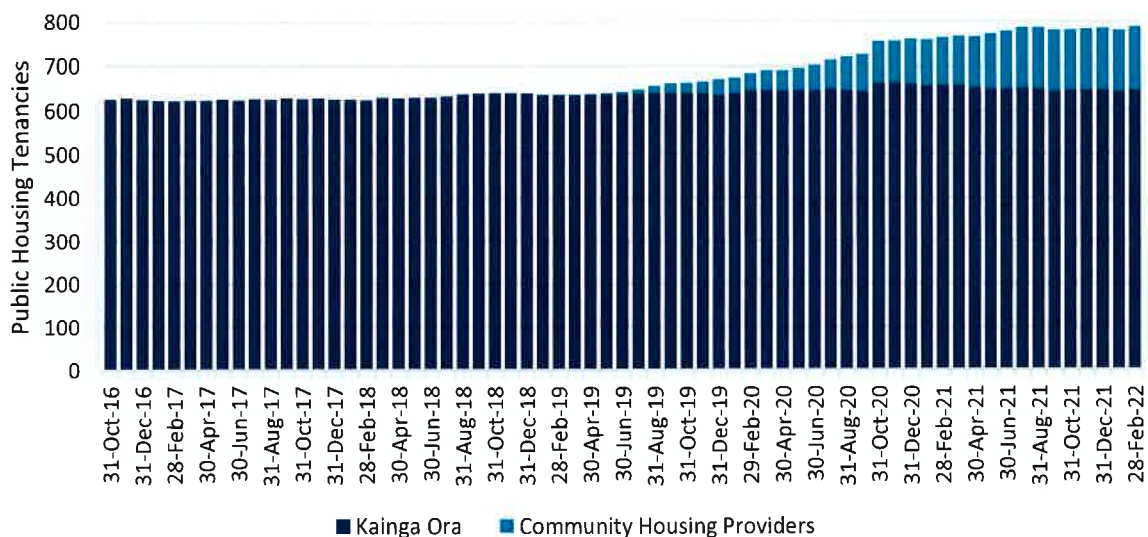


### Public Housing Tenancies

Currently 1.1% of Public Housing Tenancies are in the Rotorua District TLA, while, as stated above, 3.3% of the Public Housing Register applications are for applicants living in Rotorua. This increases to 3.9% when only considering those on the Housing Register and not those applicants on the Transfer Register.

While the Public Housing Register in Rotorua has increased by almost 950 applications since October 2016, the number of active Public Housing tenancies has only increased by 161 (26%) tenancies, with 142 of these being provided by Community Housing Providers.

**Figure 9: Number of Public Housing Tenancies in Rotorua by month and provider**





The number of applicants housed in Public Housing from the Register in Rotorua is proportionally lower than the number of applications in Rotorua on the Register. In 2021, 87 (1.4%) of new Public Housing Tenancies were in the Rotorua District, while at the end of 2021, 3.3% of the Public Housing Register applications were for applicants living in Rotorua, up from 2.5% of applicants in January 2021.

The increase in the number of applications housed in Rotorua in 2020 was due to applications being housed by Community Housing Providers. From the start of 2020 to the end of 2020 Community Housing providers increased the number of tenancies in Rotorua from 36 to 98.

**Table 1: Number of Applications housed in Public Housing each year in Rotorua and Nationally**

Year	Rotorua Number Housed	National Number Housed	Percentage in Rotorua
2016	61	6,597	0.9%
2017	59	7,075	0.8%
2018	58	6,588	0.9%
2019	80	7,267	1.1%
2020	152	7,067	2.2%
2021	87	6,116	1.4%

## ***Demand for Emergency Housing in Rotorua***

The number of households accessing Emergency Housing in Rotorua has increased significantly since 2016 in line with National trends.

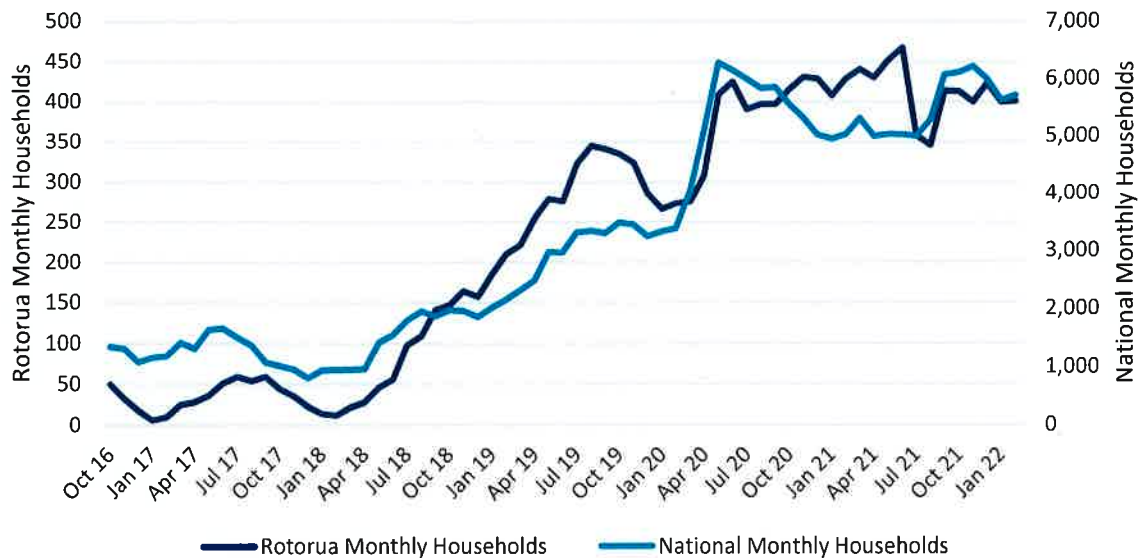
Rotorua appears to have had higher proportions of households in Emergency Housing in 2019 (with around 10% of all Emergency Housing households being in Rotorua) and again at the start of 2021 where Rotorua households accounted for around 9% of all households. Noting, it is estimated that only around 1.5% of the National population is in Rotorua.

The number of households requiring Emergency Housing in Rotorua increased significantly in early-mid 2020 due to the National COVID-19 level four lockdown. This increase was in line with National trends as clients were unable to stay with family and friends or in other shared accommodation due to the bubble concept which was implemented to reduce the spread of COVID-19.

The monthly number of households in Rotorua accessing Emergency Housing Special Needs Grants (SNGs) dropped in mid-2021 with the introduction of Contracted Emergency Housing. Around 250 families and whānau with children were prioritised to move from SNG funded Emergency Housing in to Contracted Emergency Housing. However there has been another increase in EH SNG use in Rotorua, with around 400 households being supported by Emergency Housing SNGs each month since September 2021.



**Figure 10: National and Rotorua Households in Emergency Housing, funded by EH SNGs across each month<sup>9</sup>**



## Transitional and Contracted Emergency Housing in Rotorua

### Contracted Emergency Housing

Contracted Emergency Housing was established on 1 July 2021 in Rotorua to provide better support and outcomes for people living in emergency housing motels, particularly families and whānau with children.

The key changes agreed to by Cabinet as part of the Rotorua pilot were:

- HUD contracting specific motels to provide emergency accommodation, with an initial focus on the approximately 200 families and whānau with children in EH-SNG motels.
- Providing better supports through HUD, who contract for additional wraparound support services to meet the needs of the families in those contracted motels, and MSD improving supports available for those remaining in the current EH-SNG funded places.
- The implementation of Te Pokapū – a Rotorua Housing Hub to strengthen assessment and placement processes for emergency housing clients and co-locate relevant services, including MSD.

<sup>9</sup> Due to suppliers of Emergency Housing not being geocoded in MSD systems, this data is based on EH SNGs where the clients address at the time of the grant is in the Rotorua Territorial Local Authority (TLA). Rotorua may not be the location of their Emergency Housing. Similarly, clients in Rotorua Emergency Housing with addresses outside of the Rotorua TLA will not be included in this analysis. This methodology is consistent with previously released data for OIAs and PQS, but does differ from the analysis in the second half of this paper.





Currently 13 motels in Rotorua have been contracted by HUD and are housing around 250 households. Contracted wraparound support services are provided to these households. Operational reporting obtained from HUD indicates an additional 250 households have been through this Contracted model since July 2021.

Additional support has also been made available to those remaining in non-contracted motels which are funded via EH SNGs.

### Transitional Housing

The most recent data available on HUD’s website states there are 111 Transitional Housing places in the Rotorua District as at 30 September 2021. Data from HUD’s monthly factsheets indicates there were less than 15 Transitional Housing places in Rotorua in October 2016.

The number of Transitional Housing places nationally has increased 319% from 1,123 in June 2017 to 4,710 places in September 2021. The number of Transitional Housing places in Rotorua has increased 594% from 16 places to 111 places.

The number of Transitional Housing places in Rotorua dropped in mid-2020 to 68 places, due to the closure of the Night Shelter in Rotorua that was being managed by Visions of a Helping Hand. The majority of clients displaced from the Night Shelter were placed into COVID Motels (contracted by HUD), which continue to operate in Rotorua with Visions of a Helping Hand providing wraparound support to clients.

As at the end of September 2021, 2.4% of the Transitional Housing places were in Rotorua, while 6.8% of Emergency Housing households were in Rotorua that month, with an additional 250 households also being accommodated in Contracted Emergency Housing.

**Figure 11: National and Rotorua Transitional Housing places by quarter<sup>10</sup>**



<sup>10</sup> Data Sourced from the Ministry of Housing and Urban Development [The Government Housing Dashboard | Te Tūāpapa Kura Kāinga - Ministry of Housing and Urban Development \(hud.govt.nz\)](https://www.hud.govt.nz/the-government-housing-dashboard/) March 2022



## ***Where are Rotorua Emergency Housing clients coming from?***

### **Approach**

For the following analysis, we looked at all of the clients who entered Emergency Housing in 2021 (i.e. a new spell began in Emergency Housing<sup>11</sup>). This population was then reduced to only include clients who had spent time in 2021 in Rotorua Emergency Housing<sup>12</sup>. There were 1,121 clients who began 1,213 spells in Emergency Housing in 2021 and spent part of that spell in Rotorua during 2021.

The following analysis uses this 1,121 as our base population<sup>13</sup>. The first spell a client began in 2021 is the spell retained for this analysis.

A Client's recorded address<sup>14</sup> one month before the beginning of their Emergency Housing stay was used to determine where clients were coming from before entering Emergency Housing in Rotorua in 2021. Clients were then classified into four groups based on this previous address information, at the Territorial Local Authority (TLA) level. The following 4 categories were used:

- Clients with an address in Rotorua a month before entering Emergency Housing (Blue on Figure 12 below)
- Clients with an address in Neighbouring TLA's a month before entering Emergency Housing (Teal on Figure 12 below). This includes the following TLAs: Western Bay of Plenty, Kawerau District, Whakatāne District, Tauranga City, Ōpōtiki District, Waipa District, Taupō District and South Waikato District (Blue on Figure 12 below)
- Clients with an address in another part of New Zealand a month before entering Emergency Housing
- Clients with an unknown address one month before entering Emergency Housing.

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<sup>11</sup> This analysis is based on spells in Emergency Housing. A spell is defined as an almost continuous period in Emergency Housing which is ended after an absence period of 4 weeks or more. If the client returns to Emergency Housing with more than 4 weeks between their last check out date and next check in date, this is considered to be the beginning of a new spell in Emergency Housing.

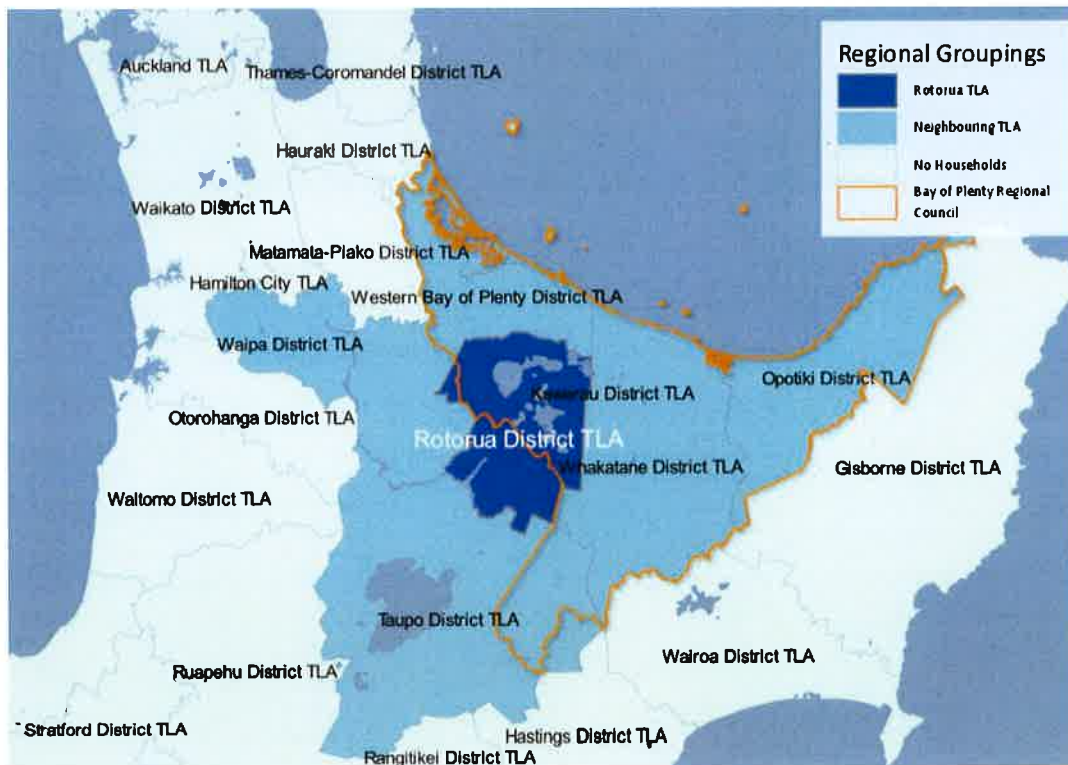
There were 84 clients included in this analysis who had more than one spell begin in Emergency Housing in Rotorua in 2021 (16 clients had 3 spells begin and 76 clients had 2 spells begin in 2021). To simplify the analysis these spells are referred to individually as if the clients were not re-entering Emergency Housing and were in fact new clients and are labelled as such in this analysis.

<sup>12</sup> This analysis uses experimental geocoding tools and processes to estimate regions for Emergency Housing Suppliers. Due to the nature of this new and unofficial analysis method, previously published data and analysis will differ as different logic is used to determine the region of suppliers.

<sup>13</sup> This analysis does not include clients who were already in Emergency Housing prior to 1 January 2021. This analysis does not take into account previous spells a client may have had in Emergency Housing.

<sup>14</sup> The computational analysis carried out of addresses one month prior to a client entering Emergency Housing only looked at recorded residential addresses. The subsequent manual analysis looked at all recorded addresses on a client's file which provides a fuller picture of a client's location. A number of clients may not have previous address information recorded in MSD systems as they may not have been MSD clients prior to entering Emergency Housing.

**Figure 12: Map of TLAs, Regional Council and classifications used for analysis**



### **Where did clients live before they entered Emergency Housing?**

Our initial approach to the question of where clients were living before entering Emergency Housing was to use the approach outlined above. We were looking only at the clients address data exactly one month prior to entering Emergency Housing.

This preliminary analysis determined that, of the 1,121 clients that entered Emergency Housing in 2021 and stayed in Emergency Housing in Rotorua:

- 668 (60%) were already living in the Rotorua District one month before entering Emergency Housing
- A further 208 (19%) clients were living in one of the Neighbouring TLAs
- Another 171 (15%) came from other regions across New Zealand, including Auckland and Tauranga City
- The remaining 74 clients (7%) had an unknown address one month before their stay in Emergency Housing began

In total, 79% of clients were confirmed through previous address data as living in Rotorua or a neighbouring TLA in the month before entering Emergency Housing using MSD address data.

This analysis is extended upon in the following section where case notes and individual client circumstances are used to supplement this analysis.



**Figure 13: Initial analysis of Address of clients one month prior to entering Emergency Housing in Rotorua in 2021**

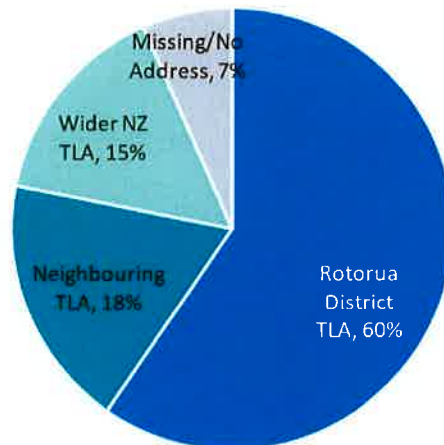


Figure 14 below shows that the Whakatane District contributed the highest number of clients, with 58 clients (5%) in Emergency Housing in Rotorua coming from the Whakatane District based on client addresses one month prior.

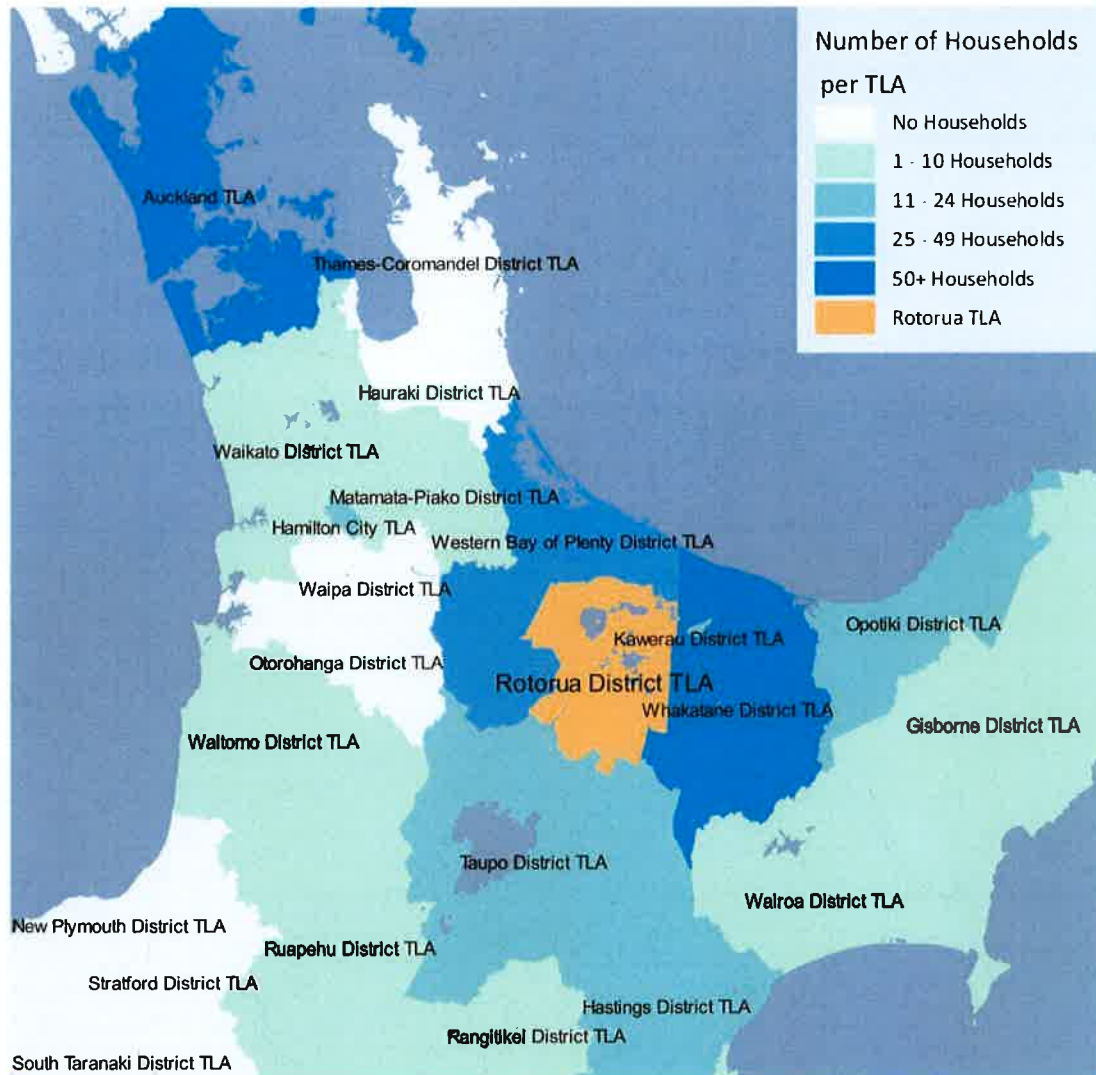
Another 59 clients (5%) had addresses in the Auckland City TLA one month before entering Emergency Housing and staying in Rotorua at some point.

Tauranga City (36) and South Waikato District (29) TLAs each represented 3% of clients based on their previous addresses, with small numbers having addresses in other TLAs across of New Zealand.

There are 9 clients (1%) with addresses in the South Island one month before entering Emergency housing in 2021 which included a stay in Rotorua Emergency Housing at some stage in 2021. These clients had addresses in Christchurch City (4), Nelson City (1), Tasman District (1), Dunedin City (1) and Clutha District (2).



**Figure 14: Location of clients with a non-Rotorua District address one month prior to entering Emergency Housing 2021 by Territorial Local Authority (TLA)**



### **An in-depth look at clients with addresses in other regions**

For the analysis above, we were looking at the data to find an address exactly one month before the client entered Emergency Housing. Due to gaps in recorded addresses in MSD's Client Management System (CMS) this sometimes did not pick up that the client was already living, or previously had been living, in Rotorua.

We closely examined the client files, address history and case notes of the 245 (21.8%) clients who had an address outside of Rotorua or the neighbouring TLAs one month before they entered Emergency Housing.

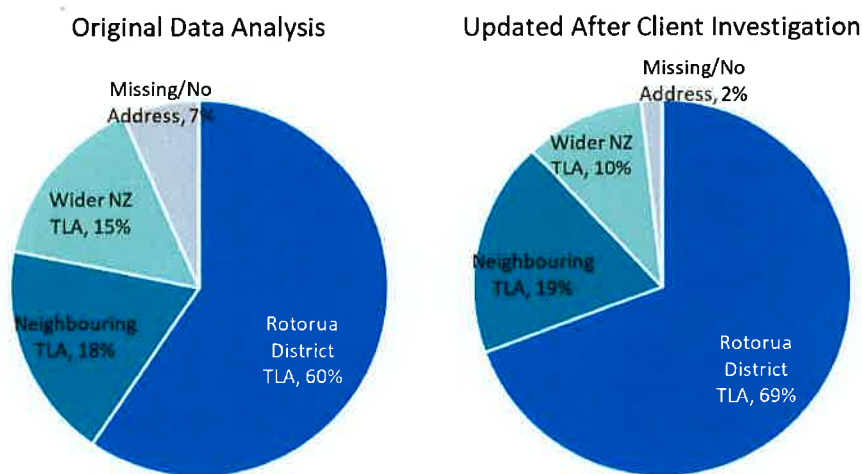
The available address history for these 245 clients showed that 56 (33%) of the clients from the wider TLAs of New Zealand and 54 (73%) of the clients with an unknown address were from or had previously lived in Rotorua. This means that a total of 110

(45%) of the 245 clients who had appeared to come from outside the Rotorua region, had previously lived in the Region. Many had address records that showed these clients were from Rotorua or had lived in Rotorua for a number of years before requiring Emergency Housing.

Investigation showed that missing addresses were common while clients were sleeping in cars or staying temporarily with family or friends prior to requiring Emergency Housing.

Updating the pie graph above in figure 13 to account for this new information, we can now see that 70% of the clients who entered Emergency Housing in Rotorua in 2021 were from Rotorua or had previously been living in Rotorua.

**Figure 15: Location of applicants one month prior to entering Emergency Housing in Rotorua for 2021 – updated to include those from the Rotorua region who were originally classified as coming from outside the wider Bay of Plenty**

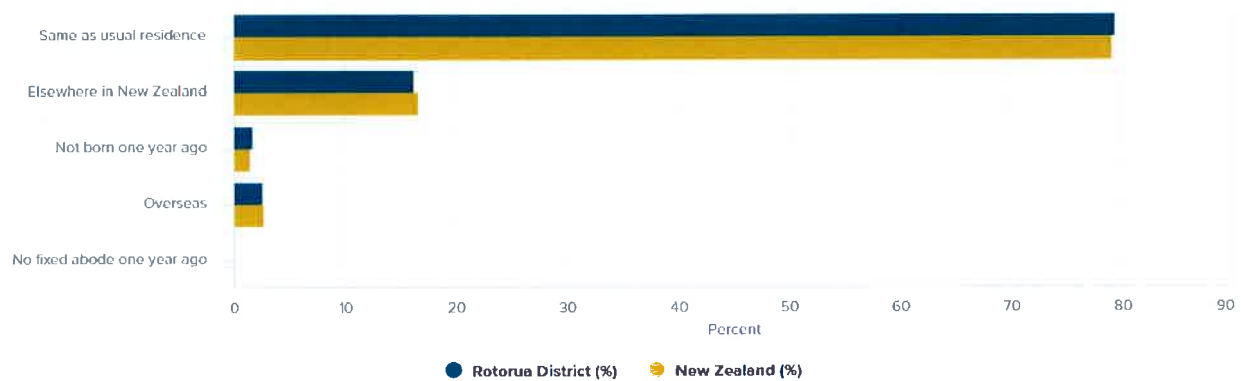


This analysis aligns with information produced by Statistics New Zealand as part of the 2018 New Zealand Census. This found that in 2018, 16.3% of those living in the Rotorua District had been living outside the Rotorua District a year earlier<sup>15</sup>.

<sup>15</sup> Usual Residence one year ago Sourced from Statistics New Zealand [Place Summaries | Rotorua District | Stats NZ](#) March 2022



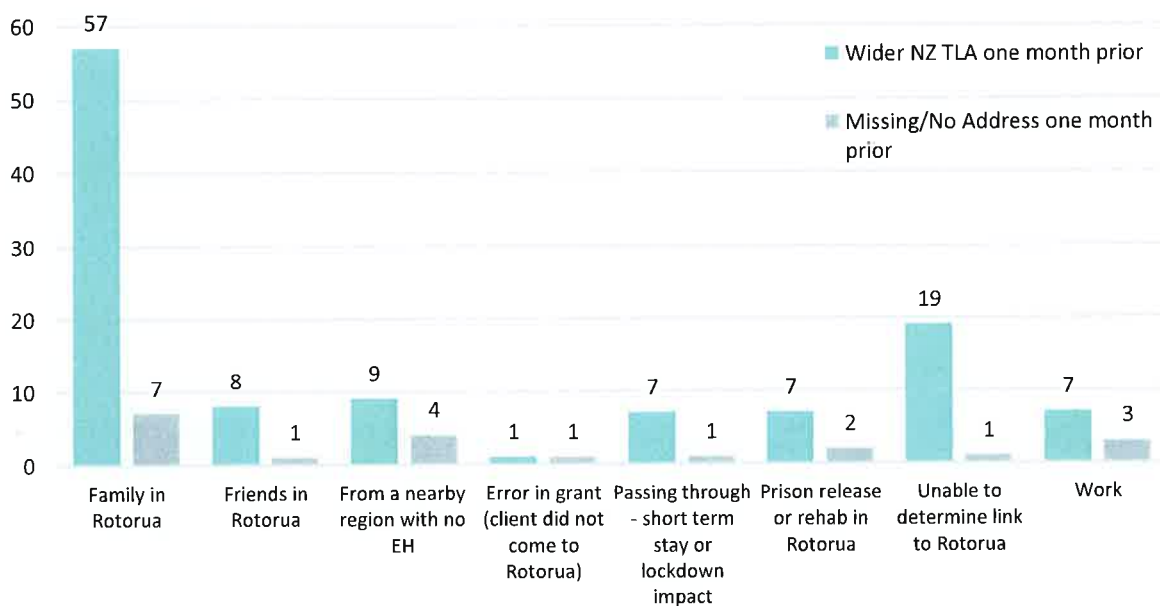
**Figure 16: Usual residence one year ago for people in Rotorua District and New Zealand, 2018 Census<sup>16</sup>**



### Why are clients coming to Rotorua?

For those who did not previously have an address in Rotorua, or after searching address history did not appear to have a history that indicated they were from Rotorua, we sought to establish the reason for their Emergency Housing need in Rotorua. This was done by looking at individual client case notes and the comments attached to their Emergency Housing SNG applications. The results of this analysis are displayed in figure 16 below.

**Figure 16: Clients with an address in wider NZ TLAs or unknown/missing one month prior to entering Emergency Housing (who were determined not to have been from Rotorua) by reason for requiring Emergency Housing in Rotorua**



<sup>16</sup> Statistics New Zealand have advised that this data needs to be treated with caution as there are high rates of missing data for the Māori population and usual residence one year ago variable is rated as poor quality



Of these 135 clients in Emergency Housing in Rotorua who did not have a previous address link to the district, 64 (47%) had family in Rotorua and an additional 9 (7%) had friends in Rotorua. Many of these clients had previously been living with their family or friends in alternative accommodation in Rotorua before requiring Emergency Housing for themselves. Others had come to assist with the care of family members, for example children or relatives.

13 (10%) of these clients who were in Rotorua Emergency Housing had returned to their hometowns in nearby regions and been unable to obtain Emergency Housing locally in these regions due to the limited supply available. This included clients seeking Emergency Housing in their hometowns of Kawerau, Taumarunui, Tokoroa and the Whakatāne District.

The rehabilitation services provided by Lifewise in Rotorua brought a small number of clients to Rotorua who required Emergency Housing pre- or post-rehabilitation. Likewise, there seemed to be a small number of clients recently released from prison who made their way to Rotorua to make a fresh start.

There were 8 clients (6%) who required Emergency Housing in Rotorua for short periods of time as they were passing through Rotorua on their way to another destination. In the case of 6 of these clients, the August 2021 lockdown impacted their need for and duration of Emergency Housing in Rotorua.

10 clients (7%) had relocated to Rotorua for work (including seasonal work) or for work opportunities without accommodation secured resulting in the need for Emergency Housing.

For the remaining 20 clients we were unable to establish a link from their case notes to Rotorua. This could be from a lack of information in the notes, or limited previous interactions with MSD. It is important to note that this does not mean that these clients did not have a link to Rotorua.

### **Characteristics of these clients**

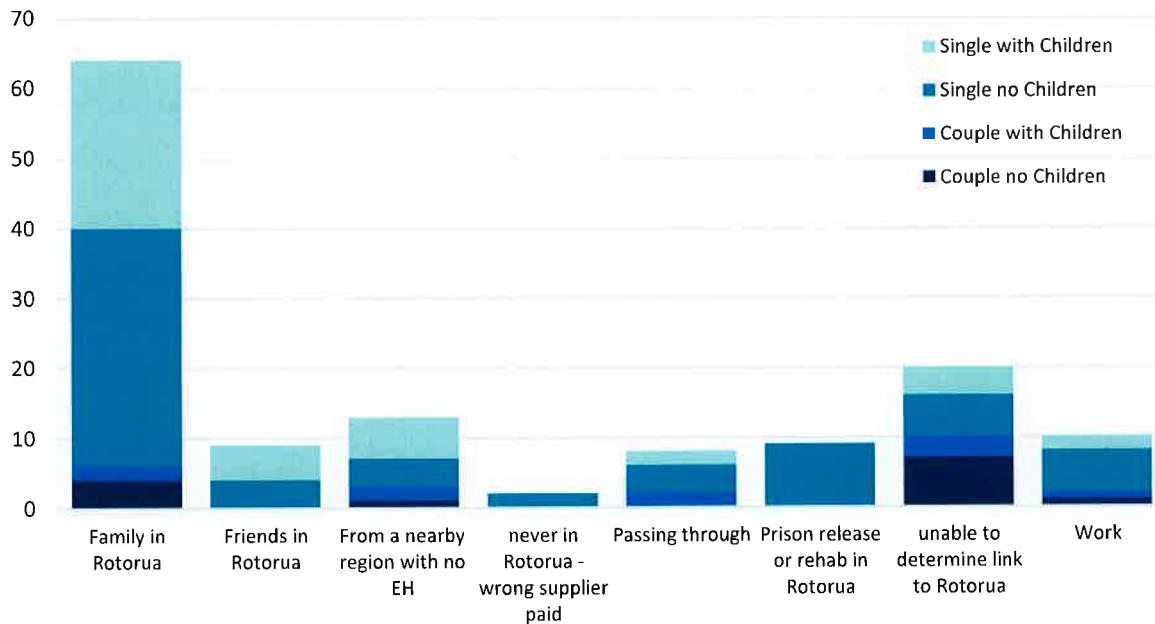
Of the 135 clients who entered Emergency Housing in Rotorua without a previous address link to Rotorua, 47 (35%) were aged under 25, 60 (44%) were aged between 26 and 39, 25 (18%) were aged 40-64 and 3 (2%) were over 65.

When looking at the household type for these clients, 43 (32%) were single adult households with children staying in the Emergency Housing with them. 69 (51%) were single with no children. Only 23 (17%) were couples.





**Figure 17: Clients with an address in wider NZ TLAs or unknown/missing one month prior to entering Emergency Housing (who were determined not to have been from Rotorua) by reason for requiring Emergency Housing in Rotorua and household type**



Almost all these clients (86%) were on a benefit at the time of entering Emergency Housing, with 77 (57%) receiving Job Seeker Support, and 25 (18%) receiving Sole Parent Support. There were small numbers of clients receiving NZ Super, Supported Living Payment, Youth Payment or Young Parent Payments. An additional 5% of clients were receiving ongoing financial support from MSD in the form of supplementary assistance (Accommodation Supplement, Temporary Additional Support or Disability Allowance).

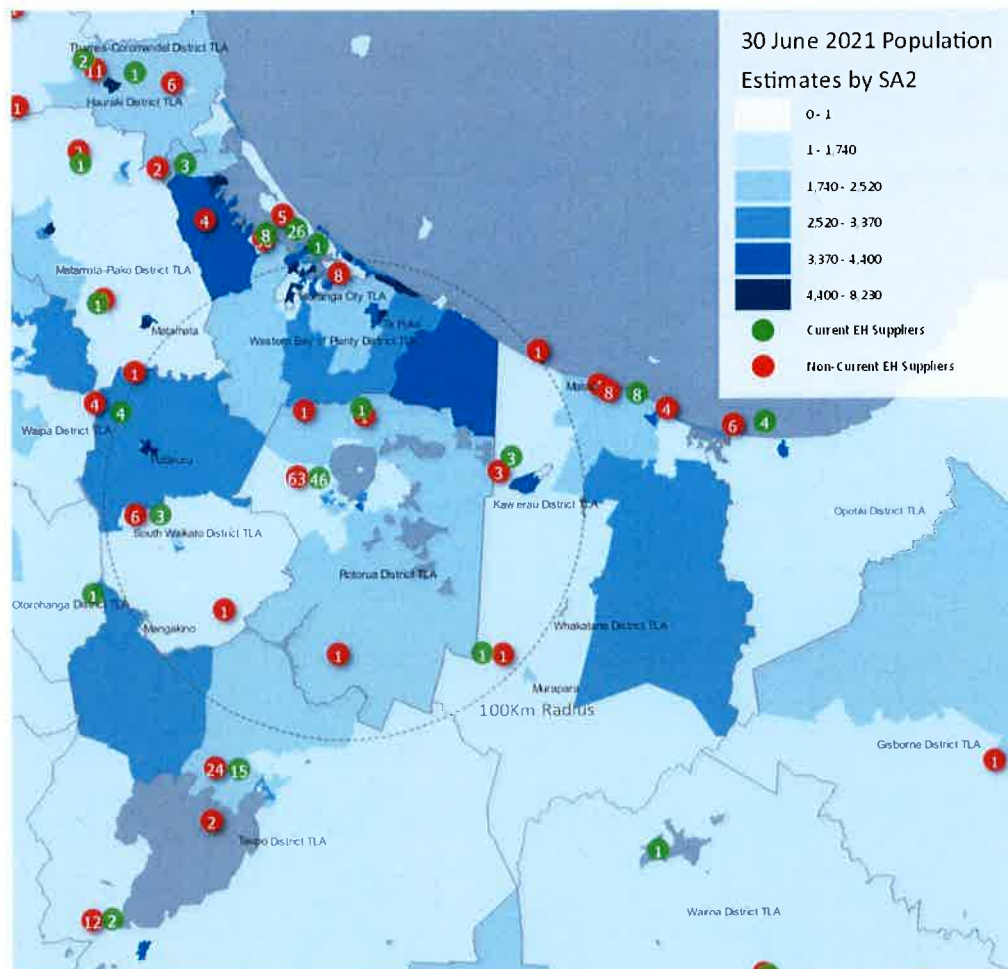
**Regional distribution of registered Emergency Housing Suppliers.**

By incorporating Emergency Housing supplier information, we can gain insight into the availability and utilisation of Accommodation suppliers in the region. The lack of Emergency Housing suppliers in nearby TLAs is a contributing factor to the numbers of clients from nearby TLAs seeking accommodation in Rotorua.

Figure 18 below displays the number of current Emergency Housing suppliers (green circles) that have been used for Emergency Housing in the quarter ending December 2021. Non-Current suppliers (red circles) have been used previously for Emergency Housing but have not been in use in the quarter ending December 2021.

The number of suppliers within nearby TLAs has decreased, with only small numbers of Emergency Housing suppliers in use in nearby regions. Rotorua has the highest concentration of current Emergency Housing suppliers, with an additional 13 Contracted Emergency Housing providers, followed by Tauranga City and Taupō.

**Figure 18: Number of current and non-current Emergency Housing suppliers by location**



Population estimates sourced from StatHz: <https://www.stats.govt.nz/information-releases/subnational-population-estimates-at-30-june-2021-provisional>

### Clients who began their Emergency Housing stay outside of Rotorua

30 (2.7%) of the 1,121 clients in our population started their Emergency Housing stay in a region other than Rotorua, before relocating to Emergency Housing in Rotorua at some stage.

- 7 (23%) of these clients had an address in the Rotorua District one month before entering Emergency Housing in another TLA
- 10 (33%) of these clients had an address in one of the neighbouring TLAs one month before entering Emergency Housing outside of Rotorua
- 7 of these clients began their Emergency Housing stay in Auckland, 6 in Tauranga, 4 in Hamilton City and 4 in the Taupō District. The remaining clients began their spells in Hastings District (2), Ōpōtiki District (2), with one client beginning a spell in each of Nelson City, Kawerau District, Whakatāne District, Matamata-Piako District and Napier City

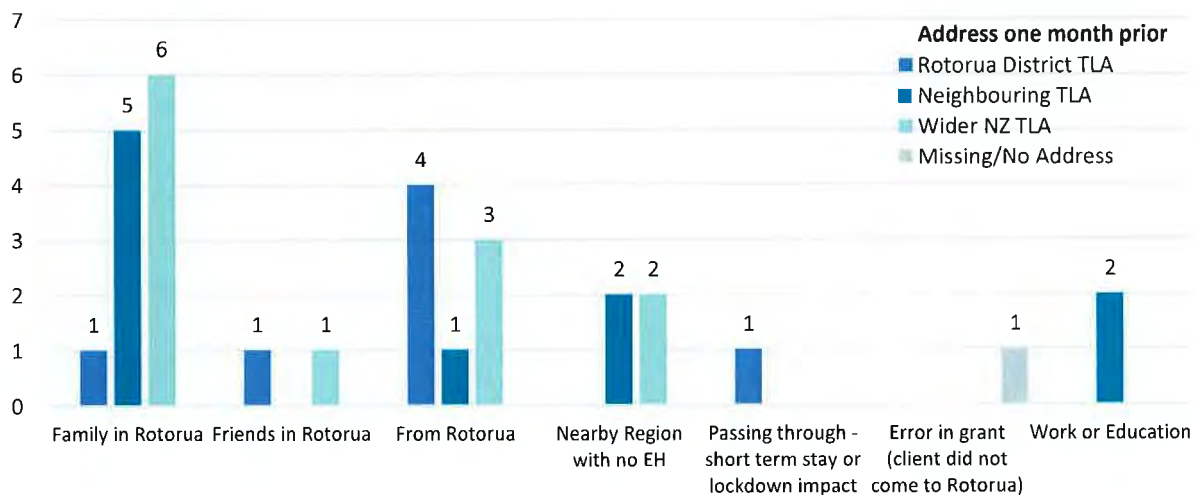


- 10 (33%) had relocated to Emergency Housing in Rotorua within the first month of their Emergency Housing stay

An investigation into these 30 clients' records to determine why they had moved from Emergency Housing in another region to Emergency Housing in Rotorua found that:

- 12 (40%) had family in Rotorua
- 8 (27%) were from Rotorua and had lived there previously
- 4 (17%) were in nearby regions where local Emergency Housing suppliers were unable to accommodate the client long term and had only offered short-term accommodation initially (Kawerau and Whakatane).
- 2 (7%) had moved to Rotorua for job opportunities or youth education
- 2 (7%) moved to Rotorua to be supported by friends
- 1 (2%) was passing through Rotorua and affected by the August lockdown
- 1 (2%) was for a client who was never in Rotorua as the grant was made in error.

**Figure 19: Clients who began their Emergency Housing spell outside of Rotorua before requiring Emergency Housing in Rotorua by Reason for moving to Rotorua and their address one month prior to entering Emergency Housing**



Report prepared by <sup>s9(2)(a)</sup> [redacted] and <sup>s9(2)(a)</sup> [redacted]

Housing Insights, System Performance

Ministry of Social Development

April 2022

Rautaki me Matawhānui



14 September 2022

Kari Wratten-Lowe  
Solicitor  
Holland Beckett Law  
Tauranga

kari.wratten-low@hobec.co.nz

**Re: Official Information Act Request HN200003063**

Thank you for your request for information under the Official Information Act received on 17 August 2022 seeking the following information from Te Whatu Ora Lakes.

(a) Confirmation of the number of individuals under special care of compulsory mental health orders residing or registered that are or have been residing at the addresses outlined at [2] broken down by year across the last six years;

(b) Confirmation of the number of drug overdoses or drug related incidents reported in relation to individuals who are or have been residing or registered as residing at the addresses outlined at [2] broken down by year across the last six years;

(c) Confirmation of the number of alcohol related incidents reported in relation to individuals who are or have been residing or registered as residing at the addresses outlined at [2] broken down by year across the last six years;

(d) Confirmation of the number of hospital admittances reported in relation to individuals who are or have been residing or registered as residing at the addresses outlined at [2] broken down by year across the last six years; and

(e) Any reports, documentation or correspondence regarding additional resources or proposals for additional resources to Rotorua Hospital relating to the increase in emergency housing facilities in Rotorua

The addresses are as follows:

- (a) 293 Fenton Street, Rotorua;
- (b) 299 Fenton Street, Rotorua;
- (c) 321 Fenton Street, Rotorua;
- (d) 247 Fenton Street & 12 Toko Street, Rotorua;
- (e) 249-251 Fenton Street & 14-16 Toko Street, Rotorua;
- (f) 131 Lake Road, Rotorua;
- (g) 16 Sala Street, Rotorua;
- (h) 18 Ward Street, Rotorua;
- (i) 3 Meade Street, Rotorua;

- (j) 26/28 Victoria Street, Rotorua;
- (k) 107 Malfroy Road, Rotorua;
- (l) 7 Tryon Street, Rotorua;
- (m) 273 Fenton Street, Rotorua; and
- (n) 284-286 Fenton Street, Rotorua.

In response to your request, we are able to provide the following information:

Please note, that for numbers less than five we have withheld these under section 9(2)(a) of the Official Information Act, to protect the privacy of a natural person. In doing so we have considered the public interest considerations, which do not outweigh the need to protect the privacy of the individuals.

**(a) Confirmation of the number of individuals under special care of compulsory mental health orders residing or registered that are or have been residing at the addresses outlined at [2] broken down by year across the last six years;**

2016 <5  
2017 <5  
2018 <5  
2019 <5  
2020 8  
2021 10  
2022 6

**(b) Confirmation of the number of drug overdoses or drug related incidents reported in relation to individuals who are or have been residing or registered as residing at the addresses outlined at [2] broken down by year across the last six years;**

According to our records we have not had any drug overdoses or drug related incidents in relation to individuals at the listed addresses from 2016 through to 2020.

2021 <5  
2022 <5

**(c) Confirmation of the number of alcohol related incidents reported in relation to individuals who are or have been residing or registered as residing at the addresses outlined at [2] broken down by year across the last six years;**

According to our records we have not had any drug alcohol related incidents in relation to individuals at the listed addresses from 2016 through to 2019.

2020 <5  
2021 5  
2022 8

**(d) Confirmation of the number of hospital admittances reported in relation to individuals who are or have been residing or registered as residing at the addresses outlined at [2] broken down by year across the last six years;**

2016 <5

2017 10  
2018 11  
2019 13  
2020 10  
2021 59  
2022 89

**(e) Any reports, documentation or correspondence regarding additional resources or proposals for additional resources to Rotorua Hospital relating to the increase in emergency housing facilities in Rotorua.**

Lakes appointed a Clinical Nurse Specialist – Ministry of Social Development Liaison full time 1.0 FTE and is responsible for providing specialist nursing care and expertise both in consulting, advising, direct care delivery and provision of health expertise and guidance to all staff within the MSD contracted Housing Hub and associated housing providers.

As a member of the interagency team (MSD and Public Health) the Clinical Nurse Specialist has a key resource role in supporting and enhancing timely, and effective triaging, assessment and care interventions to all people presenting to the Housing Hub and in other designated accommodation facilities in Rotorua.

**How to get in contact**

If you have any questions, you can contact us at [shan.tapsell@lakesdhb.govt.nz](mailto:shan.tapsell@lakesdhb.govt.nz)

If you are not happy with this response, you have the right to make a complaint to the Ombudsman. Information about how to do this is available at [www.ombudsman.parliament.nz](http://www.ombudsman.parliament.nz) or by phoning 0800 802 602.

Nāku iti noa, nā



**Nick Saville-Wood. Interim District Director**  
**Lakes/ Te Manawa Taki**