

Before an Independent Hearings Panel
at Christchurch

under: the Resource Management Act 1991

in the matter of: Proposed Plan Change 4 to the Christchurch District
Plan

and: **Airbnb Australia Pty Limited**
Submitter 112 / Further Submitter 4

Legal submissions on behalf of Airbnb Australia Pty Ltd

Dated: 8 October 2021

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OPENING LEGAL SUBMISSIONS ON BEHALF OF AIRBNB AUSTRALIA PTY LIMITED

INTRODUCTION

- 1 These legal submissions are provided on behalf of Airbnb Australia Pty Limited (*Airbnb*), submitter number S112 and further submitter number FS4, on Proposed Plan Change 4 to the Christchurch District Plan (*PC4*).
- 2 Airbnb has lodged written briefs of evidence from the following witnesses:
 - 2.1 Mr Derek Nolan (company evidence);
 - 2.2 Ms Natalie Hampson (economic evidence);
 - 2.3 Mr Matt Bonis (planning evidence) (including a supplementary brief in response to the s42A Addendum report and Council economics evidence).
- 3 At the time of preparing these legal submissions, the economics Joint Witness Statement was available to submitters, but the planning Joint Witness Statement was not. Counsel will address any matters arising from the planning Joint Witness Statement verbally at the hearing.

AIRBNB'S POSITION AT DATE OF HEARING

- 4 Airbnb maintains the position it has held throughout this plan change process – PC4 is not the most appropriate way to give effect to the purpose of the Resource Management Act 1991 (*RMA*).
- 5 Home-sharing (also sometimes called “short term rental accommodation”) enhances the economic, social and cultural wellbeing of the district. As discussed by Ms Hampson and Mr Nolan – it helps build resilient communities and robust economies by increased visitation and spending by Airbnb guests, often in areas that do not traditionally benefit from the tourist dollar.
- 6 At the outset, it is crucial to bear in mind that the situation in Christchurch is not comparable to places like Queenstown-Lakes or MacKenzie districts (the other districts in New Zealand where more stringent regulation of home-sharing is proposed). Christchurch is not a resort town, and there is no evidence that home-sharing in Christchurch has an impact on housing availability or affordability – or that it even affects a significant proportion of the housing stock.¹
- 7 PC4 proposes an unjustifiably burdensome regime that is confusing, complex, and costly for hosts. It appears to be based on the

¹ Evidence in Chief of Natalie Hampson, 7 May 2021, at [92].

premise that home-sharing activities are commercial in nature, a notion that Airbnb fundamentally opposes. Home-sharing is inherently residential in nature and this has been accepted by the Environment Court in the Christchurch context.²

- 8 The sole basis which the Council now relies on to justify this plan change is the potential for localised amenity and residential character effects. This concern is based on a small number of surveys and stakeholder discussions which are of limited assistance in demonstrating any concrete evidence of effects to a level of significance that warrants the provisions proposed through PC4.³ The Council has not called any witness who can assist to interpret those surveys and the anecdotal evidence collected. In the absence of such analysis, there is no sound justification for the level of regulation proposed in PC4.
- 9 In fact, the evidence points strongly towards a “light touch” planning regime for home-sharing in Christchurch.
- 10 Airbnb does accept that for the approach to home-sharing regulation in Christchurch would benefit from reform. As it stands, the planning framework is unclear as to how home-sharing activities should be treated.
- 11 Airbnb seeks that PC4 as notified be rejected and that clear, simple provisions are inserted into the Christchurch District Plan which enable visitor accommodation and recognise the importance of Airbnb and other similar accommodation types to the economy and community of Christchurch.

ARCHIBALD V CCC

- 12 This plan change largely appears to be a response to the 2019 Environment Court decision in *Archibald v Christchurch City Council*.⁴
- 13 While *Archibald* related to a specific property, the case is highly relevant to the broader context and to the stated rationale for PC4:
 - 13.1 In *Archibald* the applicant sought consent to continue renting out a large dwelling in a residential zone (on Creyke Rd), on an “un-hosted” basis, for six months of the year, to accommodate up to 12 guests at any one time through Airbnb. This would attract discretionary activity status according to the proposed drafting for PC4 put forward in the s42A Addendum;

² *Archibald v Christchurch City Council* [2019] NZEnvC 207 at [42] and [44].

³ Evidence in Chief of Natalie Hampson, 7 May 2021, at [71] – [74].

⁴ [2019] NZEnvC 207.

- 13.2 The Council declined the application. The Environment Court overturned the Council's decision, holding that consent should be granted;
- 13.3 The effects of this un-hosted home-sharing activity on residential character and amenity were found to be "insignificant";⁵
- 13.4 The Court rejected the argument that un-hosted home-sharing is commercial in nature and therefore should not be provided for in residential zones.⁶ The Court found that:⁷
"Having regard to the ordinary usage of the term "residential", in substance the activity is residential in nature albeit that the proposal is for transient accommodation. The occupation of a residential dwelling by fee paying guests is no different in substance to bed and breakfast, farm stays or boarding houses."
- 13.5 The Court commented that:⁸ *"It is not particularly insightful to say because the appellant is carrying on a business supplying guest accommodation at a tariff therefore the activity is commercial in nature. The same can be said for bed and breakfast, farm stays and boarding houses and yet these activities are defined in the District Plan as "residential activities" and permitted within zone."*
- 13.6 The Court overturned the Council's decision to decline consent for use of the property for home-sharing, stating:⁹ *"A precedent upon which others would seek to rely may well be created based on the court's interpretation. The issue for the City Council, however, is not that a precedent is created but that the use of existing dwellings for guest accommodation, including accommodation marketed through Airbnb, was not identified in the proposed plan as being a significant resource issue for the district. Consequently, the plan provisions may not adequately respond to the demand for this activity. Rather than applying a strained application of the plan's provisions, the City Council may consider front-footing the issue meeting the demand through initiating a plan change that responds directly to any issue created by the same."*
- 14 PC4 does not appear to reflect the findings made in *Archibald*. The Environment Court held that home-sharing in a residential zone which was un-hosted, done for six months of the year, and for up to 12 guests had insignificant effects on residential character and

⁵ At [44].

⁶ At [41] to [44].

⁷ At [42].

⁸ At [37].

⁹ At [51].

amenity and was residential in nature. PC4 does not respond appropriately to those findings, nor to the Court's ultimate decision in *Archibald*.

EFFECTS ON THE ENVIRONMENT

15 When considering whether PC4 meets the statutory tests in the RMA it is important to consider:

15.1 the effects of home-sharing activities; and

15.2 the effectiveness and efficiency of the proposed plan change.

Effects of home-sharing activities

16 There is no evidence demonstrating that home-sharing activities generate effects on the environment which require regulation of the sort proposed. This activity takes place in just 2.9% of the housing stock across the entire district.¹⁰

17 As is clear from the economic evidence (and as confirmed by the economics Joint Witness Statement), home-sharing activities do not have any adverse effects on housing affordability or availability, nor on the viability of centres.¹¹ The experts are agreed that there is no compelling economic rationale for PC4, or for the full implementation / enforcement of the operative district plan rules in respect of home sharing.

18 In fact, the economic evidence and the evidence of Mr Nolan demonstrates that home-sharing generates a range of social and economic benefits.¹² Those benefits would be reduced if PC4 prevents hosts from continuing with home-sharing activity.

19 Any amenity or "residential character" effects arising from home-sharing are highly localised and have not been clearly identified. This type of effect is insignificant on a district level, and the gravity of asserted amenity or character effects, even at an individual level, is not clearly established. However, as this is the core reason put forward by the Council to support PC4, it is discussed further below.

¹⁰ Evidence in Chief of Natalie Hampson, 7 May 2021, at [122].

¹¹ See also the s42A Report at [2.2.11]: "*Through research that Council has undertaken, there has not been found to be significant negative impacts of home-sharing accommodation in a Christchurch context on housing supply and affordability, rural character and amenity nor the regeneration of the Central City that would otherwise provide a basis for such a restrictive approach to small-scale, part-time listings by permanent residents of the unit or rural holiday homes listed when not in use by the owner(s).*"

¹² See also Economics Joint Witness Statement at [2.14].

Effects on residential character and amenity values

- 20 The Council has not assessed the extent to which short-term accommodation results in localised adverse effects on the character and amenity of residential zones.
- 21 The Council relies on a small collection of surveys and stakeholder engagement discussed in the Section 32 Report, and on pre-notification consultation undertaken by the Council regarding preferred options for PC4.¹³ Public feedback of this kind is not a complete nor appropriate source of information upon which to base an effects assessment. The Council has not called any witnesses to provide an analysis or discussion of the data presented in the Section 32 Report.
- 22 As Ms Hampson's evidence discusses, the presentation of the community surveys and feedback received in the Council's Section 32 Report is inaccurate and potentially misleading.¹⁴ In fact, the data suggests that only a very small portion of respondents were aware of home-sharing and considered that home-sharing accommodation has a negative impact on them. Conversely a significant number of respondents either were not aware (suggesting no effects were experienced over and above normal residential activity) or felt that home-sharing had a neutral or positive impact.
- 23 The Section 32 Report itself confirms that the "*Council received relatively few complaints that are directly attributable to home sharing accommodation activities.*"¹⁵
- 24 The Section 32 Report asserts that character and amenity effects have been identified as a result of home-sharing (including effects on noise, traffic, litter, late-night activity and reduced privacy) over and above what might be expected from a long-term residential use. To what extent that is the case is unclear.¹⁶ Yet the Section 32 Report then goes on to state that "*it is not anticipated that the changes will result in a significant change to the character or amenity of local communities.*"¹⁷
- 25 The proposed PC4 regulations for 'un-hosted' accommodation in particular (which the Council asserts are more problematic in terms of adverse effects) will manage the effects of a very small number of residential units. The restrictions sought in PC4 are completely disproportionate to the extent of adverse effects alleged by the Council.

¹³ At [2.6.5].

¹⁴ Evidence in Chief of Natalie Hampson, 7 May 2021, at [72].

¹⁵ At [2.2.48].

¹⁶ At [2.2.71].

¹⁷ At [3.2.2].

26 As Ms Hampson notes, if the scale of un-hosted activity qualifying for a controlled consent translates to just 0.3% of total dwellings in the district (and listings qualifying for a discretionary consent and non-complying consent across all zones is just 0.5% and 0.2% of total dwellings respectively), the current 'issue' of amenity effects on neighbours of un-hosted activity in the district that needs to be managed applies to only a tiny fraction of total dwellings in the district.¹⁸

27 Finally, the Council's stated rationale (protecting character and amenity of residential zones) does not match the level of regulation proposed in PC4, which includes restrictions for home-sharing activities in rural areas and traditional holiday home spots on Banks Peninsula – with discretionary or non-complying activity status triggered.

Non-RMA methods to manage any localised effects

28 There may be some localised minor or isolated amenity effects associated with home-sharing activity arising from time to time (as is often equally the case for long term accommodation). However, Airbnb does not consider that the best way to deal with these occasional effects is through a highly regulatory and prohibitive planning regime.

29 Under s32 RMA, it is open to a decision-maker to conclude that the most appropriate way to give effect to the RMA and achieve the objectives of a plan change may be via methods which are "non-statutory" or which sit outside of the District Plan.

30 Any minor or localised effects arising from home-sharing in Christchurch are most appropriately managed through voluntary methods such as Airbnb's own policies to deal with parties, neighbour complaints, guest numbers etc combined with light touch plan rules (as proposed in the evidence of Mr Bonis).

31 Airbnb already has comprehensive non-regulatory measures in place to ensure that home-sharing through its platform does not result in a nuisance or detract from the amenity of others in the area. This is set out in detail in the evidence of Mr Nolan. In summary:

31.1 Both hosts and guests are required to adhere to strict policies and standards of behaviour.

31.2 Airbnb has established a new 'Party and Events Policy' which provides clear guidance around parties and events and prohibits gatherings of more than 16 people and all disruptive parties and events.

31.3 Members of the community are actively encouraged to flag any issue or concern at any time for Airbnb to investigate via

¹⁸ Evidence in Chief of Natalie Hampson, 7 May 2021, at [119].

its 'Neighbourhood Support Line.' This allows members of the community to lodge a concern and request a call back from Airbnb. Airbnb aims to call back within 10 minutes or less which allows Airbnb to respond immediately to urgent issues as well as any long-term or recurring issues within the community.

- 31.4 Any guests or hosts who violate these standards or policies will be subject to suspension or removal from the Airbnb platform.
- 32 Airbnb has no tolerance for bad behaviour from either guests or hosts and is prepared to, and does, take action against those who wilfully fail to adhere to the standards and policies set.
- 33 These non-RMA mechanisms are appropriate for addressing any issues regarding adverse amenity effects on residential areas. There are also other tools that are appropriate for addressing immediate amenity issues should they arise – such as excessive noise directions.¹⁹ These will be more effective and far more immediate than any Council resource management enforcement measure.
- 34 Further, it is perfectly conceivable that the effects raised in the Section 32 Report and Section 42A report (including Mr Bayliss' Addendum) would be experienced to the same extent from long term residential activities of the same site. In that respect, Airbnb does not agree that home-sharing creates effects over and above long term residential activities, particularly where long term residential activities are not subject to any strict standards, policies, and enforcement.

THE RESOURCE MANAGEMENT FRAMEWORK

- 35 Section 74(1) RMA requires that a territorial authority prepare a plan change in accordance with its functions (section 31), the provisions of Part 2 of the RMA, and its duty under section 32.

Section 32

- 36 Section 32 of the RMA provides that an evaluation report prepared by the Council must:
- 36.1 examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purposes of the Act; and
- 36.2 examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by –

¹⁹ Sections 326-327 RMA.

- (a) identifying other reasonably practicable options for achieving the objectives; and
- (b) assessing the efficiency and effectiveness of the provisions in achieving the objectives; and
- (c) summarising the reasons for deciding on the provisions; and

36.3 contain a level of detail that corresponds to the scale and significant of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.

37 As it stands, PC4 is not the most appropriate way to achieve the purposes of the RMA.

The extent to which the objectives of the proposal are the most appropriate way to achieve the purposes of the RMA (s 32(1)(a))

38 The 'most appropriate' method does not need to be the superior method. Section 32 requires a value judgement as to what, on balance, is the most appropriate when measured against the relevant objectives of the proposal. "Appropriate" means suitable.²⁰

39 The purposes of the RMA, as set out in Part 2 section 5, is to promote the sustainable management of natural and physical resources. Sustainable management is further defined as meaning:

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.*

40 Home-sharing is an efficient use of a physical resource (housing stock) which allows people to provide for their social and economic wellbeing and which has clear positive flow-on effects for the Christchurch economy and tourism sector. This is confirmed in the economics Joint Witness Statement.

²⁰ *Rational Transport Soc Inc v New Zealand Transport Agency* [2012] NZRMA 298 at [45].

- 41 The Section 32 Report states that the primary goal of PC4 is to clarify the regulation applicable to home-sharing accommodation.
- 42 The Section 32 Report also states that the plan change is proposed in order to manage adverse effects of home-sharing. The Council's subsequent evidence, Section 42A Report and Section 42A Addendum clarify that the effects to be managed are localised effects on residential amenity and character.
- 43 The economics Joint Witness Statement confirms agreement between Ms Hampson and Mr Osborne that the current plan rules do not represent an efficient or effective approach to managing home-sharing.
- 44 Airbnb supports the Council's overall goal to clarify the regulation applicable to home-sharing in Christchurch. However, it maintains its position that the proposed objectives set out in Mr Bonis' evidence are more appropriate and better achieve the purpose of the Act and the stated overall goal for PC4. Mr Bonis' proposed provisions also better give effect to the Strategic Objectives of the District Plan and to other relevant objectives in the District Plan zone chapters.
- 45 As set out earlier in these submissions, the evidence does not demonstrate a need to manage localised amenity or character effects in the manner proposed. What is more, the evidence shows that home-sharing provides a range of social and economic benefits which would be curtailed by the regulation now proposed by the Council.
- 46 The objective put forward for PC4 relating to the management of highly localised amenity matters is therefore not the most appropriate way to give effect to the RMA.

Whether the provisions in the proposal are the most appropriate way to achieve the objectives (s32(1)(b)):

- 47 For the reasons explored above, Airbnb's position is that the Council's stated specific objective for PC4 (to manage localised amenity and residential character effects) does not achieve the purposes of the RMA.
- 48 With respect to the objective of clarifying the rules applicable to home-sharing, the provisions proposed by Mr Bonis are more appropriate than those set out in the Section 42A Addendum. Mr Bonis' draft provisions are more efficient and effective than those proposed by the Council, better supported by evidence, and are proportionate to the scale and significance of the issue.
- 49 The evidence of Ms Hampson, Mr Nolan, and Mr Bonis is clear that the level of regulation contained in proposed PC4 is not justified by evidence, is overly burdensome, and is not necessary in order to manage localised amenity effects. PC4 as proposed will be neither

efficient nor effective in achieving the stated objective, nor is the level of regulation consistent with purpose of the RMA.

- 50 A more enabling, "light touch" suite of provisions would more appropriately achieve the purpose of the RMA and the stated objectives of PC4.

CONSIDERATION OF HIGHER ORDER DOCUMENTS

- 51 The Council must prepare PC4 in accordance with a national policy statement (s74(1)(ea) RMA) and the Plan must "give effect to" any relevant higher order planning documents (s75(2) RMA).

- 52 The higher order documents of relevance here are:

52.1 The National Policy Statement on Urban Development 2020 (*NPS-UD*); and

52.2 The Canterbury Regional Policy Statement (CRPS).

The NPS-UD

- 53 It is submitted that the proposed Plan Change is contrary to the NPS-UD. The NPS-UD provides a framework which effectively requires Councils to enable a range of urban development opportunities and be responsive to diverse and changing needs of communities.

- 54 Of most relevance are objectives 1, 2, and 4 which provide as follows:

Objective 1: *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.*

Objective 2: *Planning decisions improve housing affordability by supporting competitive land and development markets.*

Objective 4: *New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.*

- 55 These objectives flow directly into the policies of the NPS-UD (most relevantly policies 1 and 6) which among other things:

55.1 Require planning decisions that contribute to well-functioning environments, which are urban environments that, as a minimum (among other things):²¹

²¹ Policy 1, NPS-UD.

- (a) enable a variety of homes that meet the needs, in terms of type, price, and location, of different households; and
- (b) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets.

55.2 Provide that changes to an urban area may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types.²² These changes in amenity values are not, of themselves, an adverse effect.

56 As it stands, PC4 proposes to prescribe an overly restrictive regime on an activity that is essentially residential in character – contrary to the intent of the NPS-UD. What is more, the plan change is focused on addressing “effects” which amount to changes in amenity values.

57 PC4 would therefore not contribute to a well-functioning urban environment, as it is not enabling or supportive of different types of residential housing nor does it reflect the acknowledged reality that urban environments develop and change over time in response to the diverse and changing needs of people and communities.

58 In order to give effect to the NPS-UD, this plan change must be generally enabling of short-term accommodation.

The CRPS

59 The CRPS does not address the issue of home-sharing specifically. Given the small proportion of housing stock used for this activity, and the absence of any significant effects as discussed in Ms Hampson and Mr Osborne’s evidence, it does not appear to be a significant resource management issue for the region – hence the lack of specific discussion in the CRPS is not surprising.

60 The enablement of home-sharing and light touch regulation as proposed by Airbnb more appropriately gives effect to the CRPS, looked at broadly (in the absence of any specific direction).

61 The objectives and policies in the CRPS related to directing commercial activities into commercial centres are, at most, peripherally relevant to PC4. As made clear in the economic evidence of Ms Hampson and Mr Osborne, home-sharing has no discernible impact on the commercial viability of centres and there is no basis to use this matter as a justification for the plan change.

²² Policy 6, NPS-UD.

- 62 The introductory section 1.2.2 of the CRPS states "*The tourism sector needs rural and urban accommodation, retail, transport, food and servicing facilities.*"
- 63 Objective 5.2.1 states that development should function in a way that enables people and communities to provide for their social, economic and cultural well-being and health and safety.
- 64 Policy 5.3.12(2) relates to rural areas only and directs that tourism, employment and recreational development in rural areas should be enabled in a way that is consistent with rural character, and at a scale that would not compromise the primary focus of accommodating growth in well designed and sustainable development patterns.
- 65 In respect of urban areas, the CRPS is focused on providing a range of housing types²³ and providing for a range of densities and uses.²⁴ The CRPS also has a general focus on enabling the economic recovery and prosperity of Christchurch.

Strategic objectives in the District Plan

- 66 Strategic directions are intended to address the key strategic and significant resource management matters for the district and provide a guide to decision making at a strategic level.²⁵
- 67 The Christchurch District Plan provides that the objectives and policies in all other chapters of the District Plan are to be expressed or achieved in a manner consistent with the strategic objectives.
- 68 We assess each of the most relevant strategic objectives against the proposed Plan Change in turn:

Strategic objective 3.3.1

Enabling recovery and facilitating the future enhancement of the district

- (a) *The expedited recovery and future enhancement of Christchurch as a dynamic, prosperous and internationally competitive city, in a manner that:*
- (i) *Meets the community's immediate and longer term needs for housing, economic development, community facilities, infrastructure, transport, and social and cultural wellbeing; and*
 - (ii) *Fosters investment certainty; and*
 - (iii) *Sustains the important qualities and values of the natural environment.*
- 69 PC4 as proposed will be contrary to strategic objective 3.3.1 in that it will result in significant adverse economic effects to home owners

²³ Objective 6.2.2(2), CRPS.

²⁴ Objective 6.2.3(4), CRPS.

²⁵ MfE, National Planning Standards, Part 7.

looking to use their homes as an alternative source of income via home-sharing. PC4 as proposed will impose unnecessary consenting implications that will detract from:

69.1 Christchurch being a dynamic, prosperous and internationally competitive city; and

69.2 Economic development and investment certainty.

Strategic objective 3.3.2
Clarity of language and efficiency

(a) *The District Plan, through its preparation, change, interpretation and implementation:*

(i) *Minimises:*

A. *transaction costs and reliance on resource consent processes; and*

B. *the number, extent, and prescriptiveness of development controls and design standards in the rules, in order to encourage innovation and choice; and*

C. *the requirements for notification and written approval; and*

(ii) *Sets objectives and policies that clearly state the outcomes intended; and*

(iii) *Uses clear, concise language so that the District Plan is easy to understand and use.*

70 The proposed plan change will be contrary to this strategic objective in that it seeks to significantly increase the consenting burden on homeowners. PC4 will result in increased transaction costs and reliance on resource consent processes to an extent that is not appropriate nor justified for the effects at issue. PC4 is overly complicated, onerous and prescriptive.

71 Strategic objective 3.3.4 directs that there should be "a range of housing opportunities available to meet the diverse and changing population and housing needs of Christchurch residents", including a range of housing types, densities and locations (as consistent with the NPS-UD). Strategic objective 3.3.7 directs that the urban environment should be attractive to residents, business and visitors, and encourages efficient use of buildings and land, with character and amenity values appropriately managed. Airbnb submits that PC4 has the potential to reduce housing opportunities and housing types, does not meet the diverse and changing needs of Christchurch residents, and reduces attractiveness of the urban environment to residents and visitors. It is therefore also at odds with those strategic objectives.

CONCLUSION

- 72 Following the filing of Mr Osborne’s economics evidence, the s42A Addendum, and the economics Joint Witness Statement it is clear that the rationale for this plan change is based on limited – if any – actual evidence.
- 73 In the circumstances, Airbnb submits that the Panel should not accept the proposed drafting put forward by the Council. The regime proposed introduces a level of regulation that is simply unjustified.
- 74 Airbnb agrees that the regulatory scheme for home-sharing requires clarification. The drafting proposed by Mr Bonis provides a clear and simple approach to regulating this activity which will improve certainty for all parties, while imposing a level of regulation much more appropriate to the effects of this activity.
- 75 Airbnb seeks that the Panel grant the relief set out in Mr Bonis’ evidence.

Dated: 8 October 2021



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