

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

Summary of Evidence of Derek Nolan

Dated: 20 October 2021

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SUMMARY OF EVIDENCE OF DEREK NOLAN

- 1 My full name is Derek Nolan.
- 2 I am the Head of Public Policy, Australia and New Zealand at Airbnb Australia Pty Limited (Airbnb).
- 3 Airbnb, and short term rental accommodation generally, allows people to contribute to the social and economic fabric of their city and to support themselves or supplement their income in a flexible way.
- 4 The largest asset that most people will ever own is their home – an asset that takes decades to pay off. Short term rental accommodation allows people to generate a little extra income from their homes in a flexible way and it is complementary to residential character and neighbourhoods.
- 5 At a macro level, short term accommodation makes an important contribution to the tourism economy in Christchurch. Hosts are keen ambassadors for Christchurch and the Canterbury region. Research commissioned by Airbnb shows that in one year alone, Airbnb guests who stayed in Christchurch spent over \$50 million, which supported 360 jobs and contributed over \$35 million to Gross Regional Product.
- 6 In his evidence Mr Bayliss comments that he considers there are potentially significant adverse effects for residential amenity, neighbourhood coherence, and nuisance which arise from short term rental accommodation. I disagree. The risk of these issues arising from short-term rental accommodation is no different to the risk that someone might have inconsiderate neighbours living next-door to them on a permanent basis.
- 7 The overwhelming majority of our community are respectful travellers and considerate neighbours who genuinely care about the neighbourhoods in which they're staying and living. Nonetheless, our message to everyone using our platform remains clear; bad behaviour has no place on Airbnb and those who wilfully fail to adhere to our policies face removal from our platform. Guests and Hosts who violate Airbnb's standards and policies may be removed from the platform. For example, Airbnb's party policy already prohibits gatherings of more than 16 people and bans all disruptive parties and events.
- 8 It's worth understanding the type of guests using our platform and short term rental accommodation. STRA is not just offering holiday accommodation, people are using STRA while they renovate their own homes; to "try before you buy" when they're looking to relocate to Christchurch; to have a "home away from home" when a loved one is getting treatment at the hospital - they want somewhere that feels like home, where they can cook a meal, after a day in the

hospital; to visit their kids who are studying at the university. Guests who are visiting the city for a holiday are often choosing the destination based on accommodation offerings. A group of friends who want to stay together and enjoy breakfast together before a day out visiting the city and attractions, or family who need access to a washing machine because they have young children.

- 9 Our Hosts are proud Cantabrians - who value their community and the neighbourhoods where they live. The two-way review system regulates behaviour on both sides, guests and Hosts want 5 star ratings after their stay so they can keep on using the platform. Potential guests can see reviews of a Host's home to identify both positive and negative feedback, and Hosts can look at similar assessments of any potential guests. Hosts set clear house rules for guests to abide by, they vet their booking requests to check for positive reviews, they use our messaging tool to find out more about why guests are visiting and they communicate way finding, parking instructions, rubbish and recycle disposing etc. Importantly, they often inform their neighbours of their hosting activity and share phone numbers in case anything should occur that disrupts the peace of the neighbourhood. We, as a platform, encourage this of all our Hosts.
- 10 Our team works collaboratively with government and police. As part of this, we continue to enforce a global ban on parties and have launched a Neighbourhood Support Line, which allows neighbours to request a call from a specialised support agent and makes it even easier for people to raise any issues with our rapid response team that may arise with nearby listings.
- 11 Airbnb also has a dedicated Law Enforcement team who support police efforts. Our online portal provides law enforcement with a direct and secure channel to submit and track valid requests for information.
- 12 This level of regulation is suggested for a very small proportion of the Christchurch housing stock.
- 13 If the plan change is about setting standards, Airbnb has policies and standards which proactively address issues like nuisance, noise, or neighbour disturbance. There is no need for planning land use rules to set these types of standards. I also understand that there are already laws and regulations which deal with noise and nuisance in the community – such as enforcement of excessive noise done by noise control services.
- 14 The level of regulation is heavy handed and disconnected to the issues that the Council is looking to resolve. For example, under the rules currently proposed a group of 10 students could rent a 6-bedroom house for the year without the owner requiring resource consent. Yet a family who owns a 6-bedroom house will not be able to put it on Airbnb for two weeks while they are away over

Christmas without having to get a resource consent. In both cases, it is most likely there would be no nuisance or disturbance to neighbours – it's a possibility in either case, but also not something that is sure to happen.

- 15 The resource consenting process remains confusing. For example, would a host have to apply for consent in anticipation that they might have a guest at some point who has a delayed flight and arrives after 10pm? If a person has a resource consent for up to 6 guests and then wants to host 7 guests on a one-off occasion they will have to apply for another consent or (more likely) simply abandon the opportunity? What happens if a person gets a resource consent and then stops hosting for a few years?
- 16 I understand that the Council has maintained the position that short-term rental accommodation is best characterised as a commercial or "non-residential" activity. Listings on Airbnb make use of residential units and involve people undertaking normal residential activities (sleeping, making meals, relaxing) in those dwellings. The character of a house listed on Airbnb is the same as if the dwelling was occupied by the owner, a long-term tenant, a boarder, or if the occupant has friends or family visiting.
- 17 Thank you – I am happy to answer any questions from the Panel.