

UNDER THE RESOURCE MANAGEMENT ACT 1991

BEFORE THE

Hearing Commissioners for the Christchurch City
Council

IN THE MATTER OF

Proposed Plan Change 4: Short-term
Accommodation

**STATEMENT OF RAY EDWARDS ON BEHALF OF:
THE COALITION FOR SAFER ACCOMMODATION IN CHRISTCHURCH**

DATE

20 October 2021

Introduction

Background

1. My name is Ray Edwards and I have been engaged by the *Coalition for Safer Accommodation in Christchurch* (the Coalition) to prepare this statement in support of their submission in partial opposition to the notified Proposed Plan Change 4: Short-term accommodation (PC4).
2. The Coalition is a group of 84 concerned Christchurch operators of accommodation facilities that include Hospitality NZ members, hotel and motel owners, backpacker accommodation owners and holiday park owners.
3. From the outset it is important to note that the Coalition supports the concept of short-term residential accommodation providers (STRA – or also known as peer-to-peer accommodation providers), such as platforms like AirBnB, whether hosted or non-hosted. The Coalition considers that all activities that provide increased accommodation options for tourism in Christchurch will ultimately benefit the wider community.
4. Many of the Coalition’s members operate lawfully established accommodation within the residential areas affected by PC4. The Coalition seeks increased regulation of non-hosted accommodation providers such that safer overall community outcomes are achieved and, ultimately, a more level playing field is achieved in terms of matters such as building compliance – particularly in residential areas. The group does not want to discourage non-hosted accommodation activities provided matters such as residential amenity are properly safeguarded.
5. I emphasise that the position of the Coalition is not driven by market competition factors and that the Coalition does not seek to gain a trade competition advantage through their submission. The Coalition considers that they are not a trade competitor for the purposes of section 308B (2) b) of the Resource Management Act 1991 (RMA).
6. The Coalition lodged a submission partially opposing PC4 as notified, and Urbis assisted with the preparation of that submission. Beyond that, Urbis has also assisted the Coalition with providing advice on plan change processes, matters of scope and relevance, interpretation of District Plan rules (both operative and proposed) and assisting with the refinement of submissions that will be presented by Coalition members before the Commissioners. An outcome of those processes is that the Coalition has asked me to present this opening statement. It is important to note that I am presenting this statement not as a particular expert, but simply to assist the Coalition with presenting their position.

7. The purpose of this statement is to:
- a) Summarise PC4 as notified;
 - b) Summarise the Coalition's position on the notified proposal (I will assume that the Commissioners have read the lodged submission and further submission lodged by the Coalition);
 - c) I will then briefly discuss the relevant change made to the content of PC4 since the submission was lodged, and then;
 - d) Discuss the Coalition's current position on the amended PC4 proposal.

Qualifications and Professional Experience

8. I hold the qualifications of a New Zealand Certificate in Civil Engineering, and a Certificate of Transport Planning, Management and Control from the University of New South Wales. I am also an accredited RMA Commissioner.
9. I have over 31 years employment in the field of civil engineering, 28 of which has involved resource management related planning and traffic engineering for the Christchurch City Council and also as a consultant to government agencies, other local authorities, and private developers. I therefore have extensive experience acting as an expert witness on planning and traffic related issues associated with land use development, as well as the preparation and implementation of District Plans. My experience also includes many appearances before the Environment Court.
10. For the last 16 years I have been the Managing Director of Urbis TPD Limited (Urbis) which is a Christchurch based consultancy that provides planning, transportation planning and traffic engineering related advice. Urbis has been involved with over 4,000 projects nationwide including a significant amount of work relating to resource consent and plan change processes. Despite my extensive experience with these processes, I reiterate that this submission is being presented to assist the Coalition with presenting their position and not as a particular expert.

Concerns of the Coalition

11. The Coalition recognises the increase in demand for STRA over the past few years and welcomes the tourism boost that this form of accommodation brings to Christchurch. The Coalition classifies this type of accommodation activity into two forms being hosted or non-hosted accommodation activity.
12. The Coalition recognises that hosted accommodation activity is already catered for as a permitted activity through the District Plan classification of 'bed and breakfast' activity. In particular it is noted that (as an example for the Residential Suburban zone):
 - a) Hosted STRA falls under the definition of a 'bed and breakfast' activity which is defined as being "*the use of part of a residential unit for the provision of transient residential accommodation, at a tariff*". This is a permitted activity under Rule 14.4.1.1 (P15) for:
 - i. up to six guests;
 - ii. A single maximum stay of 90 days;
 - iii. at least one owner of the residential unit residing permanently on site.Exceeding any of the above criteria requires resource consent for a discretionary activity under Rule 14.41.4 (D2).
13. For completeness, the Coalition is not opposed, nor seeks changes to, rules relating to hosted accommodation at a scale anticipated by, for example, Rule 14.4.1.1 (P15) or the changes subsequently recommended by the Council.
14. However, the Coalition has a number of concerns regarding unregulated non-hosted STRA. In their opinion, non-hosted STRA activity has the potential to negatively impact the district if not properly regulated. The Coalitions concerns regarding PC4 as notified include:
 - a) The potential effect on housing supply;
 - b) The negative effect of STRA on residential amenity;
 - c) The potential impact on centre vitality and amenity;
 - d) Enforcement and monitoring, and;
 - e) Other regulatory concerns not addressed by the plan change.

15. Non-hosted STRA falls under the definition of 'Guest Accommodation' which is defined as being *"the use of land and/or buildings for transient residential accommodation offered at a tariff"* and *"includes hotels, resorts, motels, motor and tourist lodges, backpackers, hostels and camping grounds"*. It excludes bed and breakfasts and farm stays. Again, as an example, establishing this type of activity in the Residential Suburban zone requires resource consent for a discretionary activity under Rule 14.41.4 (D1).
16. From the above example, it can be seen that the operative District Plan definition does not recognise the concept of non-hosted STRA. The Coalition accepts that this seems to have occurred as a result of this type of accommodation becoming popular after the last District Plan review provides some six years ago. The result is that the operative District Plan does not robustly manage non-hosted STRA. The Council's S42A report comments that the majority of this type of activity occurs without consent, and when they do apply for consent, there is an inconsistency with operative objectives and policies that provide a hurdle for this type of activity to become lawfully established.

PC4 as Notified

17. Given the above concerns, the Coalition supports the concept of PC4 as there is a need to do something to allow for, but at the same time, regulate this type of activity within Christchurch in a way that encourages people to comply, while also maintaining an appropriate distribution of accommodation activities throughout the city.
18. To summarise PC4 as notified, in residential zones, instead of requiring a discretionary activity resource consent for any non-hosted visitor accommodation in a residential dwelling, PC4 would require;
 - a) A controlled activity resource consent for 60 nights or fewer per year;
 - b) A discretionary activity resource consent for 61-180 days per year, and;
 - c) A non-complying activity resource consent for more than 180 days per year.
19. The Coalition opposes the proposed plan change in part, being the controlled activity classification for non-hosted visitor accommodation, and the criteria that would afford a controlled activity status being;
 - a) For a total per site of 60 nights or fewer per year (as above);
 - b) For a maximum of six guests at any one time;

- c) Where check-in and check-out times are not between the hours of 22:00pm to 06:00am; and
- d) Where guests do not hold function or events on the site where the number of additional attendees exceed the number of paying guests staying overnight.

The applicable zones are all residential zones apart from the *Residential Guest Accommodation* zone.

The Coalition's Submission

20. In their original submission, the Coalition requested relief to the effect that:
- a) A minimum restricted discretionary activity status be imposed on non-hosted visitor accommodation. This was seen as being a suitable compromise between enabling this type of activity in a general sense but, importantly, always affording the Council the ability to decline an application if potential effects of it could not be suitably mitigated.
 - b) A maximum (full) discretionary activity status be imposed on non-hosted visitor accommodation for more than 60 days. Note there that the Coalition seeks the removal of the non-complying activity status for more than 180 days per year. This is because the Coalition supports the concept of peer-to-peer accommodation providers provided safer overall community outcomes are achieved.
21. The above simplification of the notified PC4 rules is considered by the Coalition to be a suitable level of control that would readily enable a Council to decline an application on suitable grounds, but not require the more onerous S104D gateway test including compulsory consideration of objectives and policies. This was seen as being a suitable compromise on the basis that even at greater than 60 days non-hosted use, a given non-hosted activity could still be predominately, or at least have the appearance, residential activity.
22. This approach is consistent with the opinion of Mr Bayliss who used the precedent set by *Archibald v Christchurch City Council 2019 [NZEnvC 207]* where visitor accommodation in a six-bedroom house operating for six months of the year was deemed "*residential in nature*". Therefore, the Coalition considers that this type of activity does not warrant a non-complying activity status, rather a decision on a short-term residential accommodation activity should be made based on a range of effects based factors about a proposal but still with reference to the objectives and policies of the plan rather than a compulsory consideration of them under s104D.
23. The Council's section 42A report responded to the Coalition's submission and stated that in the Council's view, a controlled activity status is more appropriate because at under 60 nights a year, the

residential unit will still be providing a residence for most of the year. Therefore, any effects would be negligible upon residential coherence. Further, the Council considers that while there may still be isolated incidents of noise or other behaviour impacting upon neighbour's amenity, the odds of this occurring will decrease as the unit is used for visitor accommodation less frequently and can be managed through consent conditions. The original Council Officer's opinion on the Coalition's submission was to reject it where the Coalition was in opposition to the notified Plan Change.

The Coalition's Further Submission

24. The Coalition then made a further submission that outlined the submissions of others where the Coalition was in support. In summary, the issues raised in the submissions of others that the Coalition supports falling into the following categories:
- a) Those that believe the plan change does not properly account for the potential effects of non-hosted STRA on residential amenity (such as S36, S70, S80, S81, S87);
 - b) Those that wish to restrict STRA in order to mitigate the potential cumulative effects within developments and residential neighbourhoods (such as S75, S132).
 - c) Those concerned about the enforcement and monitoring of STRA (such as S2, S32.2, S131);
25. The Coalition's further submission also addressed those submissions that the Coalition opposed. In summary, the issues raised in the submissions of others that the Coalition supports falling into the following categories:
- a) Those who want the notified plan change rejected (such as, but not limited to, S4, S25.1, S9.1);
 - b) Those who wish for the plan change to be replaced with a less restrictive plan change or less restrictive rules (such as, but not limited to S1, S53, S41);
 - c) Those who fully agree with the notified plan change (such as S3.1, S5.1).
26. Those submissions in total opposition to the plan change are generally of the opinion that either the status quo regarding STRA is working, or that regulation of STRA is not something the Council should be involved with. Responding to these points in turn:
- a) Firstly, it is clear from the s32 report that the status quo does not allow for non-hosted STRA to establish in Residential Zones and that many STRA are operating without consent.

Retaining the status quo results in an undocumented use of housing which exacerbates the housing shortage in Christchurch.

- b) Secondly, the Council is responsible for managing the expected amenity in residential environments and the plan change will go some way toward helping manage this. But, as is clear in the Coalition's submission the potential cumulative effects of non-hosted STRA are not properly addressed in the plan change.

27. For those submitters that seek for the plan change to be replaced with a less restrictive plan change or less restrictive rules these generally involve the following;

- a) Removing the distinction between hosted and non-hosted STRA;
- b) Having different rules in different areas, and;
- c) Removing restrictions on the number of days and arrival hours STRA can operate.

28. As previously stated, the Coalition is generally in favour of PC4 and believe it will largely address the issues regarding STRA and its place within the district. Those who have proposed alternative and less restrictive rules as a part of their submission wish for reduced Council regulation of what is a commercial activity in a residential zone. This is contrary to the objectives and policies of residential zones, and will have impacts on the amenity of these zones, the housing supply within Christchurch and the vitality and amenity of commercial centres.

Changes to PC4

29. Since the Coalition's further submission was lodged, the following changes to PC4, that are considered relevant to the Coalitions submission regarding activity status, have been made by Mr Bayliss. I summarise these in Table 1 on the next page. Table 1 shows that, at the upper end of the activity status spectrum, the Council now recommends a discretionary activity status rather than a non-complying activity status. The Coalition supports this for the same reasons as Mr Bayliss, being that a non-complying activity status is overly restrictive on an activity that can, within certain parameters, be seen as largely residential in nature.

30. Table 1 also shows that, at the lower end of the activity status spectrum, Mr Bayliss still recommends a controlled activity status, whereas the Coalition continues to seek a restricted discretionary activity status such that any application for non-hosted visitor accommodation could be declined.

Notified PC4	Updated PC4	Coalitions Position
<p>Non-hosted visitor accommodation in a residential unit:</p> <ul style="list-style-type: none"> For a total per site of 60 nights or fewer per year; <p>being a controlled activity</p>		<p>Non-hosted visitor accommodation in a residential unit:</p> <ul style="list-style-type: none"> For a total per site of 60 nights or fewer per year; <p>being a restricted discretionary activity</p>
<p>Non-hosted visitor accommodation in a residential unit:</p> <ul style="list-style-type: none"> For a total per site of between 61 and 180 nights per year; <p>being a discretionary activity</p>	<p>Non-hosted visitor accommodation in a residential unit:</p> <ul style="list-style-type: none"> For a total per site of more than 61 nights per year; <p>being a discretionary activity</p>	<p>The Coalition supports the updated PC4 activity status</p>
<p>Non-hosted visitor accommodation in a residential unit:</p> <ul style="list-style-type: none"> For a total per site of more than 180 nights per year; <p>being a non-complying activity</p>		

Table 1: Summary of Activity Status for STRA through plan Change 4 process

The Current Position of the Coalition

31. Based on the changes and evidence provided since their original submission, the Coalition’s position remains unaltered. The issues presented in paragraph 14 of this statement remain. I will expand on these issues further below, with more complete commentary being provided by members of the Coalition whose presentations to the Panel will follow.

Housing Supply

32. The Coalitions position on the effects of PC4 on housing supply is to agree with the position of Mr Brett Giddens. This position being that while there may be no material effects of non-hosted short-term accommodation on both housing affordability and demand, that the Economics Joint Witness Statement oversimplifies this issue.
33. There is a recognised shortfall of housing in New Zealand with a 2019 report saying the housing supply in New Zealand is 80,000 dwellings below the required number (Jarrod Kerr, 2020). The District Plan encourages an efficient use of affordable housing to address this issue (Objective 3.3.4 and 14.2.1) yet STRA are increasingly seen as an easier investment than traditional long-term rentals.
34. In regard to the impact the supply, range or affordability of housing options as a result of the proposed changes, the section 32 report states at page 64 that because of the “*requirement for residential dwellings to be primarily used for a residential activity, the proposal should not affect the supply, range*”

or affordability of housing options for residents". The Coalition does not agree. The reality is that if a residential unit is used for 90 days or more for visitor accommodation activity, its practical use for residential activity is limited. This is exacerbated when the use gets close to 180 days and greater than 180 days, the unit should no longer be treated as a residential unit because the predominant use is visitor accommodation, not residential. This will have an effect on housing supply.

35. There will be a point where an non-hosted visitor accommodation activity in a residential unit renders the residential activity null, and the dwelling structure in which the visitor accommodation activity is undertaken is no longer a residential unit. This distinction is not captured in PC4 and the Coalition supports controls on such uses to minimise effects on centre vitality. As noted earlier, a discretionary activity status, that would afford the Council the ability to consider issues such as housing supply, is seen as being appropriate for more than 61 nights per year.
36. There are international examples of unrestricted STRA having an effect on the available housing supply with one US study finding that a 10% increase in STRA listings lead to an increase of 0.42% in rent prices and 0.76% in house prices (Guttentag, 2018) whilst another found that the regulation of STRA directly leads to lowering both rent and house prices (Doctorow, 2018).
37. Due to the lack of historical enforcement of unconsented STRA, investors encourage the use of new properties for use as STRA (Zodiak, 2019) and this adds to the housing shortage issue. The proposed plan change largely helps to address the enforcement by allowing hosted STRA to achieve consent easier (a controlled activity cannot be declined) and as such have the activity recorded by the Council and also requiring STRA providing over 61 nights' accommodation to gain consent as either discretionary or non-complying activities. The combination of these factors will discourage the use of housing for non-hosted STRA, enable more efficient enforcement and allow for more traditional long-term rentals to be added back to the property market.
38. While hosted STRA can be seen as an efficient use of housing (and can be properly assessed under both operative rules and the proposed plan change) non-hosted STRA of 60 nights or less should still be given a higher level of assessment than what is currently proposed by the Council through a controlled activity status. Similar to what is discussed above, as a restricted discretionary activity, the Council would have the ability to decline consent where cumulative effects become unacceptable. The given matters of discretion will ensure that housing is being used efficiently by ensuring the visitor accommodation activity will not become the dominant activity in an area.

Residential Amenity

39. Many of the Coalition’s members operate lawfully established accommodation within the residential areas affected by PC4. The Coalition considers that the potential effects of PC4 on residential amenity include:
- a) The increased commercialisation of residential areas;
 - b) An overall decrease in residential amenity throughout residential areas, and;
 - c) An increase in antisocial behaviours such as:
 - i. Excessive drinking and parties;
 - ii. Violence and intimidation of residents;
 - iii. The use of dwellings for illegal activities, and;
 - iv. The destruction of property.
40. Non-hosted short-term residential accommodation (‘STRA’) can affect residential amenity and social cohesion. There are numerous examples of this with one in seven Airbnb hosts in New Zealand reporting property theft or damage (Dillane, 2018) sometimes in the thousands of dollars (Feek, 2020). Similarly, antisocial behaviour such as excessive drinking (Bathgate, 2017) (McPhee, 2018) (Boyle, 2018) (One News, 2019) and excessive noise (NZ Herald, 2017) is often seen where STRA accommodation is provided. These nuisances have resulted in reported concerns of safety and amenity issues within communities (Girish Payang, 2019), can result in a loss of a sense of community (Guttentag, 2018), and have been seen to create strong community “*blowback*” (David Wyman, 2019).
41. In its current form, the plan change goes some way in addressing these potential effects. Residential amenity, and in particular effects on social cohesion and a sense of community, have been considered in the Council’s s32 report. The Coalition acknowledges that an individual non-hosted visitor accommodation activity for up to 60 nights a year would have a minimal effect on social cohesion in a given area.
42. However, the proposed plan change does not sufficiently address cumulative effects on residential amenity and cohesion. As a controlled activity, the Council must grant resource consent to the activity. In effect, all houses along a suburban street could be granted consent for non-hosted visitor accommodation and depending on which 60 nights each is rented out, could result in several months at a time where most houses are not occupied by permanent residents. Residential amenity effects, and the loss of social cohesion and a sense of community in particular, could become significant. As a

restricted discretionary activity, the Council would have the ability to manage these types of cumulative effects and decline consent when a tipping point is reached.

43. The Coalition notes that as residential density increase in order to meet NPS UD 2020 targets, these effects are expected to occur more frequently. Under PC4 as notified and/or amended by Mr Bayliss, the Council will not have the ability to effectively manage these activities when the cumulative effects begin to adversely affect residential areas as a result of the controlled activity status for up to 60 nights.
44. It remains the Coalitions opinion that a restricted discretionary activity status would be more appropriate.

Centre Vitality and Amenity

45. In supporting the broader approach of PC4, the Coalition notes that expert economic evidence prepared by Mark Osborne of Property Economics, and commissioned by the Council, has been provided. This evidence investigates whether there was an economic requirement for the changes proposed under PC4. To summarise this evidence, Mr Osborne concluded that there does not seem to be any likely material economic necessity for PC4.
46. The Coalition is not presenting expert evidence to dispute the findings of Mr Osborne, however the Coalition notes that joint witness statements have also been released by those who provided expert evidence on economic and planning issues¹. These experts largely agreed that the social needs for the plan change outweighed any economic needs.
47. A point of difference was that Mr Giddens raised an issue that the Coalition supports being *“that the economic evidence and JWS oversimplify the issue.”* and that *“there could be localised effects on housing affordability and demand in centres from a predominance of unhosted short-term accommodation if the Plan provides an overly permissive pathway.”*
48. Coalition member, Kelvyn Coffey, will provide commentary on the potential effects of PC4 as notified on the vitality and amenity of commercial centres. To briefly summarise, the Coalitions concerns are as follows:
 - a) The risks of an over-supplied of peer-to-peer accommodation market, and;
 - b) How peer-to-peer accommodation disincentivises traditional accommodation providers.

¹ For the planning JWS; Ian Bayliss for CCC, Matt Bonis for Airbnb Australia Pty Ltd and Brett Giddens for Hospitality NZ.
For the economic JWS; Phil Osborne for CCC and Natalie Hampson for Airbnb

49. For the above, it is the opinion of the Coalition that a restricted discretionary activity status will afford the Council to ability to manage these potential effects.

Compliance and Enforcement

50. As previously stated, the Coalition is broadly supportive of PC4 due to the lack of compliance under the status quo. Coalition member, Mr Crooks will expand on the remaining concerns the Coalition has in regards to compliance and enforcement under PC4 and also provide examples of how STRA is been enforced both internationally and in other regions of New Zealand such as:
- a) Mandatory registration of all peer-to-peer accommodation;
 - b) Platforms (such as AirBnb) enforcing limits on accommodation provided through their platform;
 - c) Streamlined consent processes to encourage compliance, as in Kaikoura;

51. It is the opinion of the Coalition that a restricted discretionary activity status for non-hosted STRA is permissive enough to ensure compliance while appropriately managing any potential effects.

Other Regulatory Concerns Not Addressed by the Plan Change

52. Other concerns with non-hosted STRA relate to regulation outside of the District Plan framework, including around health and safety e.g. fire regulations, Council rates and the *Residential Tenancies Act*.
53. Accidents have occurred recently in non-hosted STRA, such as the Memorial Avenue fire (Kenny, 2019) and the tragic Auckland balcony death (Block, 2020) and Christchurch death. Potential breaches of the Residential Tenancy Act could also occur with stays of over 28 consecutive days (sections 13A, 17A, 18A, 23, 45, 49D and 137 of the RTA) (Faulkner, 2020).
54. It is stated on page 4 of the section 32 report that “provisions in the District Plan should not conflict with or duplicate the functions of provisions in the Building Act, Building Code or fire safety regulations that sit at the national level”. The Coalition does not seek that these documents are conflicted with or duplicated, rather it seeks that they are directed to within the District Plan provisions. Doing this will set a clearer expectation of the legal obligations a person has to meet when changing the use of a residential unit to visitor accommodation. This will also likely assist with any liability issues that the CCC could face by not making applicants aware of such obligations.

55. It is considered that better regulation of non-hosted STRA under the District Plan framework, as proposed in this plan change and with the change sought by the Coalition, will have a positive flow on effect of ensuring they are appropriately regulated under other relevant regulations.

Conclusion

56. The Coalition supports the concept of STRA being provided for in Christchurch. This accommodation style will provide increased accommodation options for tourism in Christchurch will ultimately benefit the wider community.
57. Operative District Plan rules do not properly provide for STRA. Therefore, the Coalition is supportive of the concept of PC4 as notified and recognises the need for greater compliance for STRA providers.
58. However, the Coalition considers that as a minimum controlled activity status, the Council will be unable to properly manage any negative effects of non-hosted STRA upon the residential environment. These being;
- a) The potential effect on housing supply;
 - b) The negative effect of STRA on residential amenity;
 - c) The potential impact on centre vitality and amenity; and
 - d) Enforcement and monitoring.
59. The Coalition considers a minimum restricted discretionary activity, would provide a suitable level of control and management upon STRA, whilst still being a type of resource consent that would encourage STRA compliance.
60. I am happy to answer any questions.

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