

Questioning the claim of negative amenity, coherence and character effects caused by short term accommodation.

Warwick Schaffer Tue 19th October 2021

- Between Aug 2017 and March 2020 we put a semi self contained room in our house on airbnb.
 - We hosted about 100 guests, we had no issues and met many wonderful people.
 - Our place attracts families as we have young kids ourselves and hotels are not well set up for families.
 - We had some NZ guests due to proximity (the marriage of a daughter living in the neighbourhood for example).
 - The income was less than renting long term but it was nice to meet people from around the world and it meant that we have a nice space available for friends and family when they want to visit.
 - Needing to pay for a resource consent would be a major deterrent to offering the room on a short term basis again.
 - It appears that we would be affected by the proposed changes in relation to
 - Check in and check out times
 - If we want to go away for a period and continue to rent the room.
 - The room is rented out long term now.
- Amenity, coherence and character from **whose perspective?**
 - Owner occupiers and renters, short and long all play a part in a city. 'Amenity' should not be shaped by and to suit one group (owner occupiers).
 - Cities that have a permissive stance to short term accommodation are more attractive places to visit.
 - A large range of different types of accommodation in a wide range of areas adds to a city's amenity from a visitors perspective and arguably a whole city perspective. It also spreads tourism's economic benefits more broadly.
 - Locally hosted short-term accommodation provides better surge capacity for big events.
 - Traditional hotels in specific locations are not ideal for everyone.
- Negative amenity, coherence and character effects are not different and arguably worse for **long accommodation** which is a permitted activity. It would be inconsistent to apply restrictions to short long term accommodation.

- Guests on airbnb are carefully managed
 - The double review system ensures a high level of quality, tidiness and good behaviour.
 - House rules are documented and very clearly communicated
 - There is a lot of communication care taken around checkin and checkout times.
- Short term accommodation attracts very few complaints compared to normal background complaint levels between neighbours. (see appendix 1 & 2)
 - The 'vibe' your honor
 - IAN BAYLISS pg 4 2.2 d and e
 - d. on the question of how significant these effects are over and above what can be expected from residential activity, these effects have the potential to be significant, are predictable if the activity is allowed, are likely to be recurring, and increase and decrease along with changes in the scale and extent of the activity;
 - e. it is not necessary for evidence to show widespread harm from the activity, records of huge numbers of complaints, or concerted opposition from residents, for carefully targeted controls to be appropriate in terms of their efficiency and effectiveness;
 - In our experience coming and going is not that different between short and long term accommodation or even owner occupiers.
- There are better ways to deal with any amenity issues, noise, rubbish, parking all have controls in place and are regularly used now.
- The scale is not the same between commercial accommodation and home hosted accommodation, heavy-handed regulation is not necessary or helpful.
- Short term accommodation should be a permitted activity in residential areas like long term accommodation is but limited to 6 people per household.

Appendix

1. Question put to CCC by Wendy Sealey regarding complaints about Short Term Accommodation.

I am requesting information from the CCC about the number and type of complaints received from ChCh residents, relating specifically to issues arising from having a residentially zoned property let as a Short term rental property. Whether that be in the City center or surrounding suburbs.” 14 September 2020

CCC response Oct/2020

Date	Suburb	Main Type	Sub-Type	Investigation Outcome
20/06/2019	BISHOPDALE	Guest Accommodation	STGA operating	Property owner resides onsite. Compliant with District Plan.
1/07/2019	ST ANDREWS HILL	Guest Accommodation	STGA operating	Breach identified, property owner ceased guest accommodation activity.
30/07/2019	ILAM	Guest Accommodation	STGA operating	Consented activity.
2/08/2019	CENTRAL CITY	Guest Accommodation	STGA operating	Property owner resides onsite. Compliant with District Plan.
7/08/2019	WOOLSTON	Guest Accommodation	STGA operating	No longer operating.
21/08/2019	ST ALBANS	RMA No Consent	STGA operating	Long term lease agreement in place, no breach.
4/09/2019	UPPER RICcarton	Guest Accommodation	STGA operating	Breach identified, property owner ceased guest accommodation activity.
4/09/2019	ILAM	Guest Accommodation	STGA operating	Breach identified, property owner ceased guest accommodation activity.
4/09/2019	NEW BRIGHTON	Guest Accommodation	STGA operating	Consented activity.
4/09/2019	BRINDWIR	Guest Accommodation	STGA operating	Long term lease agreement in place, no breach.
4/09/2019	WOOLSTON	Guest Accommodation	STGA operating	Property owner resides onsite. Compliant with District Plan.
4/09/2019	BRINDWIR	Guest Accommodation	STGA operating	Property owner resides onsite. Compliant with District Plan.
4/09/2019	AVONHEAD	Guest Accommodation	STGA operating	Property owner resides onsite. Compliant with District Plan.
19/10/2019	AVONSIDE	Guest Accommodation	STGA operating	Property owner resides onsite. Compliant with District Plan.
13/11/2019	FENDALTON	Guest Accommodation	STGA operating	Breach identified, property owner ceased guest accommodation activity.
26/11/2019	BRINDWIR	Guest Accommodation	STGA operating	Breach identified, property owner ceased guest accommodation activity.
15/12/2019	CENTRAL CITY	Guest Accommodation	Street Blockages	Property sold, no longer operating as a shared accommodation property.
25/12/2019	HORNBY	Guest Accommodation	STGA operating	Long term lease agreement in place, no breach.
5/01/2020	CLIFTON	Guest Accommodation	STGA operating	Property owner resides onsite. Compliant with District Plan.
7/01/2020	WESTLAKE	Guest Accommodation	STGA operating	Property owner resides onsite. Compliant with District Plan.
6/03/2020	MONCKS SPUR	Guest Accommodation	STGA operating	Breach identified, property owner ceased guest accommodation activity. Long term rental agreement now in place.
15/03/2020	RICcarton PARK	Guest Accommodation	STGA operating	Listing removed, no longer used for guest accommodation activity.
11/04/2020	NEW BRIGHTON	Guest Accommodation	STGA operating	Consented activity. No further complaints.
11/04/2020	BRINDWIR	Guest Accommodation	STGA operating	No evidence of guest accommodation activities found. Owners reside at property.
11/04/2020	WOOLSTON	Guest Accommodation	STGA operating	Property owner resides onsite. Compliant with District Plan.
11/04/2020	ILAM	Guest Accommodation	STGA operating	Short term guest accommodation activity ceased.
23/04/2020	ST ALBANS	RMA No Consent	Parking	No evidence of guest accommodation activities found. Tenants educated about the freedom camping and guest accommodation rules.
26/04/2020	ST ALBANS	Guest Accommodation	Rubbish	No evidence of guest accommodation activities found. Tenants educated about the freedom camping and guest accommodation rules.
11/06/2020	CLIFTON	Guest Accommodation	STGA operating	Property owner ceased guest accommodation activity.
11/09/2020	CENTRAL CITY	Guest Accommodation	STGA operating	Property owner ceased guest accommodation activity.
23/11/2020	WOOLSTON	RMA No Consent	STGA operating	Short term guest accommodation activity ceased.
6/12/2020	CENTRAL CITY	RMA No Consent	Noise, car movement	Breach identified, property owner ceased guest accommodation activity.
12/12/2020	CENTRAL CITY	Guest Accommodation	STGA operating	Property owner advised of District plan rules. No guest accommodation activity occurring.
18/12/2020	HEATHCOTE	RMA No Consent	STGA operating	Investigation ongoing.
3/01/2021	RICcarton	Guest Accommodation	STGA operating	Short term guest accommodation activity ceased.
11/02/2021	ADDINGTON	Guest Accommodation	STGA operating	No evidence of guest accommodation activities found.
11/02/2021	NEW BRIGHTON	Guest Accommodation	STGA operating	Property owner resides onsite. Compliant with District Plan.
11/02/2021	WAINOMI	Guest Accommodation	STGA operating	Property owner resides onsite. Compliant with District Plan.
11/02/2021	BISHOPDALE	Guest Accommodation	STGA operating	Property owner resides onsite. Compliant with District Plan.
11/02/2021	BURNSIDE	Guest Accommodation	STGA operating	Short term guest accommodation activity ceased.
11/02/2021	ST ALBANS	Guest Accommodation	STGA operating	Short term guest accommodation activity ceased.
11/02/2021	RICcarton	Guest Accommodation	STGA operating	Short term guest accommodation activity ceased.
11/02/2021	RICcarton	Guest Accommodation	STGA operating	Short term guest accommodation activity ceased.
13/02/2021	RICHMOND	Guest Accommodation	Camping	Breach identified, property owner ceased guest accommodation activity.
27/02/2021	ADDINGTON	Guest Accommodation	STGA operating	Property sold, no longer operating as a shared accommodation property.
17/03/2021	CENTRAL CITY	Guest Accommodation	STGA operating	Property sold, no longer operating as a shared accommodation property.
23/03/2021	BROMLEY	Guest Accommodation	STGA operating	Breach identified, property owner ceased guest accommodation activity.
23/05/2021	BURNSIDE	Guest Accommodation	STGA operating	Property owner resides onsite. Compliant with District Plan.
27/05/2021	NORTH LUNWOOD	Guest Accommodation	STGA operating	Short term guest accommodation activity ceased.

Analysis of that response

	2018	2019	2020
Short term accommodation occurring (against the rules)	17	13	14
Problems with short term accommodation	1	1	0
Freedom camping		2	1
Total Short term accommodation complaints	18	16	15

2. Question put to CCC by Warwick Schaffer regarding the background level of complaints in the community

Could you please send total complaints in 2019 and 2020 received by CCC about neighbours.

Please split the total as reasonably practicable into categories, noise complaints, dog complaints, rubbish, threatening or menacing behavior etc

Response

Apr 14, 2021

officialinformation@my.ccc.govt.nz

Animal management	2019	2020
Dog barking	2236	2065
Dog wandering	2445	2129
Environmental Health (Noise)	2019	2020
Noise complaints (excluding road works and concerts)	11250	14424