

PLAN CHANGE 4

Short Term Visitor Accommodation

On behalf of **Inner City West Neighbourhood Association (ICON)**

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A. ICON's focus is on **inner/central city Christchurch**. In all our submissions we have strongly supported the City's plan to bring back 20,000 residents to live within the four avenues and to help build supportive communities as articulated in the **Strategic Framework of the Long Term Plan**:

However, the growing number of unhosted short term visitor accommodation units is putting Council's *Community outcomes* at risk. Council says eg:

Resilient communities as evidenced by *a strong sense of community, active participation in civic life, safe and healthy communities.*

A Liveable city will have a *vibrant and thriving city centre, sufficient supply and access to a range of housing.*

But when inner city residential areas, already under constant pressure by commercial interests, are full of temporary visitors, such outcomes are hard to achieve. Hence the **inner city residential areas need stricter regulations**.

We all know there is a housing crisis (New Zealand Government Urban Development Statement) but when short term rental accommodation is used for temporary visitors or is unoccupied, **housing is taken out of the market at a time of great need** (Maori Council January 2021). Lacking compulsory registration and monitoring, Council has a false impression of the contribution that new builds make to the housing of desperate New Zealanders.

At **the core of this debate lies the definition of 'residential'**. Commercial interests argue that there is no substantial difference between unhosted visitor accommodation for a couple of nights and residents who live in that place year-round. On the other hand, neighbourhood groups and those committed to inner city living such as authorities in San Francisco, Barcelona and London (W. Australia Inquiry into Short Stay Accommodation 2019) know, that it takes more than buildings that look like homes to create safe, friendly, economically committed communities.

Especially since the quakes, Christchurch people know we need people who will look out for each other, who will constantly improve the physical and interpersonal environment. People who live in the city pick up street rubbish, offer help to visitors, attend events, appreciate and support

businesses, libraries, sporting events and art galleries. And as in this instance neighbourhood groups try to engage with authorities to help define and clarify the basic parameters that enable the development of the kind of city people love to **live in and to visit**.

B. Therefore

1. ICON recommends the Panel and CCC review the latest proposed regulations in the light of the Strategic Framework of the Long Term Plan and amend them where changes undermine goals such as a strong sense of community, active participation in civic life, safe and healthy communities and a vibrant **liveable** central city.

2. We are concerned that specific (and stricter) Policies and Objectives re short-term rentals within Central City residential neighbourhoods also have been removed Section 2 Evaluation (eg Appendix 2 14.2.1.3 a). We do however support the residual proposals that the inner city is an area which needs additional controls (14.6.1.2D)

3. We recommend all unhosted accommodation be restricted to commercial or mixed zones. Our second choice is the limitation of unhosted visitor accommodation in the inner city residential zones to a total of a total of six guests at a time, and 60 nights per year, non-complying thereafter.

4. We have no issues where a host lives on site. And a 60 day limit would give owner occupiers a chance to go on holiday while having some costs covered by temporary visitors.

5. We recommend CCC develops clear enforceable rules as per the list 'Under which Council has discretion' (14.6.1.2.C1) as soon as possible.

6. We strongly object to the use of 'home' sharing -plainly a misnomer and untrue- and **any attempt to blur the boundaries between hosted accommodation and unhosted.** In the case of hosted accommodation an owner or manager takes an interest in the neighbourhood, is someone neighbours can go to if a short stay visitor is not aware of whose rubbish bin is whose, if visitors are parking over the next-door driveway or disturbing others in some way.

7. We question the possibility of managing a process comprising three different stages: "Controlled activity resource consent for 1-60 days, Discretionary for 61-180 and Non-complying for more than 180 days."

How this can be managed? Certainly, it will be impossible for any neighbours who are living alongside these rental properties to know which rules are applying at any one time and as Council does not currently have any systems or adequate staff to monitor these properties and rarely acts unless a complaint is received.

8. We urge stringent registration for all unhosted short term visitor accommodation and **consequences for non-compliance.** If this is not implemented by CCC, we will never know just how many units in residential zones have been built by investors for renting short term, not primarily for permanent residents. It is our understanding that at present Council adds each new unit built to the total of housing counted as new 'residences' in the inner city. This must change.

9. We ask you to take into account the **imbalance of the parties involved in the consultation process**. Most lay people were so daunted by the protracted process, changing presentation of regulations and the clear contradiction between high level Principles, articulated in the original Christchurch District Plan and other documents, that they gave up trying to understand the implications of Bayliss's rewriting of the original CCC report. Contrast the efforts of neighbourhood groups comprising lay ratepayers and renters with the power and professional expertise commercial operations have been able to bring to this debate.

C. We ask the panel to say to the Christchurch City Council:

1. Do not permit unhosted short term accommodation in residential zones in the inner city and ONLY as a second-best option, limit them to a maximum of 60 days per year with no more than six visitors at a time, non complying thereafter.
2. Make changes to Plan Change 4 that follow through Council's own Strategic Principles and Community Outcomes of The Long Term Plan in relation to the inner city as well as enacting its own RMA Proposal (c) *amend the objectives and policies for residential zones so commercial type visitor accommodation is primarily directed to commercial areas*. (RMA Act 1991 Christchurch District Plan, Anstiss, GM Strategy and Transformation Group 21 September 2020)
3. Define what it means by 'commercial-type visitor' (Anstiss 2020). Does this include people who pay to occupy an unhosted unit for a few nights then leave as with hotel and motel guests? We recommend Council **revisit senior staff's report** to the Urban Development and Transport Committee 9 September 2020 Short term Accommodation District Plan Change 4.
4. Define 'residential' to reflect Christchurch's need to house people who live and/or work in the city for more than a few days or weeks. We recommend the adoption of General Manager's definition (ibid 3.9 b) '**reside permanently on site**'. Alternatively 'who live on site'.
5. Reject any attempts to impose the word 'home- share' and retain the differences between unhosted and hosted visitor accommodation.
6. Require compulsory registration and penalties for non-compliance.
7. Differentiate in your statistics between housing used for unhosted short term visitor accommodation and housing that is used by owner occupants or long-term renters. This requires registration and compliance systems for short term visitor accommodation, thus ensuring the city can measure progress on its own goal of attracting people to live in and are committed to the central city, its environment and businesses.
8. Improve participation by citizens by ensuring policy changes and the rationale for apparent contradictions are clearly explained. In the past senior Council officers have helped citizens see the whole picture and understand the real implications of proposed plan changes.