

2 March 2020

Christchurch City Council
53 Hereford Street
Christchurch Central City
Christchurch 8013

By email: planchange@ccc.govt.nz

Home-share accommodation District Plan review

To whom it may concern:

Tourism Industry Aotearoa (TIA) welcomes the opportunity to comment on Christchurch City Council's Home-share accommodation District Plan review.

TIA is the peak body for the tourism industry in New Zealand. With over 1,600 members, TIA represents a range of tourism-related activities including hospitality, accommodation, adventure & other activities, attractions, retail, airports & airlines, transport, as well as related tourism services.

By way of background, TIA has long advocated that the Government closely monitors and investigates international management of the Peer to Peer sector and sets requirements that provide for fairness, quality and provision of a safe and compelling visitor experience. We believe a consistent approach is needed in the way that short-term accommodation is regulated. A regulatory framework needs to be established that includes clear standards and requirements for short term visitor accommodation, including, but not limited to, fire safety systems, evacuation procedures, and general safety. The framework should also provide coherency and consistency for all TLAs and key stakeholders, ensuring that definitions, regulations, rules and compliance are consistent across the country – therefore halting the piecemeal approach currently being taken.

We note that Christchurch City Council acknowledges their lack of enforcement under current District Plan rules:

“There has been widespread non-compliance with the current District Plan Rules. Air DNA data suggests that between August 2018 and August 2019 there were at least 1600 active whole unit listings in residential zones that required resource consent.”

A district plan is a document prepared under the Resource Management Act 1991 (RMA) in conjunction with the community. Under the RMA, local authorities are responsible for monitoring to ensure activities meet requirements under the RMA, plan rules and resource consents. The

RMA does not prescribe how councils should carry out this function - councils have discretion to determine how to achieve compliance in their respective areas.

If CCC is not able to maintain compliance under their current framework, TIA questions if CCC will be able to maintain or enforce compliance under any of the new proposed options for regulation.

We are therefore advocating for Option 1 in the Discussion Paper: No change to the current District Plan provisions.

Under current arrangements, the District Plan provides for single room letting as a permitted activity, but most unhosted/whole unit listings require a resource consent (unless the property is situated in a commercial or mixed-use zone).

In the short-term, the non-compliance of home-share accommodation is having an impact now. If any of the other options are adopted, we are of the view that the problem will continue while CCC works through their processes (which may take years) to adopt a new option.

CCC should instead invest resources in enforcing the current rules under the District Plan, and thus complying with the RMA. Resolving the issues around compliance will resolve many of the issues outlined in the discussion paper around efficient use of existing housing stock; maintaining residential amenity, coherence and character; housing supply and affordability; and the economic recovery of Christchurch as a whole.

However, as stated above, TIA believes that all short-term visitor accommodation – regardless of if it is a single room listing or an unhosted/whole unit listing – ultimately needs to be brought under a regulatory framework. All properties should be placed under this clear set of standards and requirements, and for the council's part, under which compliance is enforced.

Please do not hesitate to contact us if you have any queries about our feedback.

Ngā mihi,

A handwritten signature in black ink, appearing to read 'Sally Attfield', written in a cursive style.

Sally Attfield

Hotel Sector Manager

Tourism Industry Aotearoa