

ELLA LOUISE HARDMAN

VISITOR ACCOMODATION SUBMISSION

HEARING STREAM 15

10 SEPTEMBER 2018

LAKE WANAKA CENTRE

1.0 INTRODUCTION

1.1 Thank you for the opportunity to speak today.

1.2 My name is Ella Louise Hardman. I am an Airbnb Host and a Resource Management Planner and hold a Bachelor of Commerce in International Business from the University of Otago in Dunedin, and a Post-Graduate Diploma in Arts, Planning from Massey University in Palmerston North. I am an Associate Member of the New Zealand Planning Institute. I have worked as a planner in Wanaka since 2007. Please note that this submission should not be taken as planning evidence.

1.3 The proposed Visitor Accommodation (VA) provisions seek to establish an appropriate regulatory response to increased short term letting of residential dwellings or units to visitors primarily through the use of online rental platforms. This response is clearly needed however the provisions proposed are not consistent with the number of nights a dwelling could be let short term while remaining a primary residence or with the average length of visitor stays.

1.4 I believe that the number of nights and number of lets should be increased such that they are consistent with short term let opportunities and average night stay, and that in doing so the Districts residential housing supply and affordability will not be adversely affected.

2.0 MAXIMUM NUMBER OF NIGHTS

2.1 The proposed provisions limit short term letting of residential dwellings or units as visitor accommodation to 28 nights per year. I believe that based on average annual leave and public holidays over the busier summer and school holiday periods that the total nights proposed does not provide enough flexibility for residential home owners to rent their dwellings short term.

2.2 Based on the statutory annual leave of 28 working days plus weekends, 10 public holidays plus weekends and one anniversary day for each region the total number of nights that a primary residence could be let short term by the owner while that owner remains in full time employment within the District is 45 nights.

2.3 Examples of short term let opportunities for Residential dwellings and units are as follows:

- 2 – 3 weeks over Christmas/New Year
- 1 – 2 weeks over Easter
- 1 – 2 weeks over the July School Holidays
- 1 – 2 weeks over the October School Holidays
- 3 – 4 nights over Labour weekend
- 3 – 4 nights over Queens birthday
- 12 weeks Annual School Holidays (which includes some of the let opportunities above)

2.4 Based on the above rental opportunities, Annual Leave, Public Holidays and weekends I believe that a maximum of 42 nights which equates to six weeks would be a more appropriate maximum number of nights and would provide more flexibility for residential dwelling and unit owners, while protecting the Districts residential housing supply and maintaining residential character. In addition, providing flexibility in this way, in my opinion makes an important contribution to affordability by allowing residents to supplement their income.

3.0 NUMBER OF LETS

3.1 The proposed provisions limit the number of lets to three, however this number is not consistent with the average night stay in the District. As noted in the Infometrics Report 'Measuring the Scale and Scope of Airbnb in Queenstown-Lakes District dated October 2017 the average visitor night stay in the District is 4.1 – 4.2 nights (please refer to page 16 of the report), therefore based on the proposed maximum of three lets per year, a homeowner wishing to short term let their dwelling or unit would only be able to manage on average 12 nights per year which is well under the proposed maximum number of permitted nights.

3.2 I do not believe that there should be a limit on the number of lets provided that the maximum number of VA nights are not exceeded, however if there has to be a limit on the number of

lets I believe that the number of lets permitted should be consistent with the average night stay in the District. Therefore, I believe that based on an average of four night stay as noted in the Infometrics Report, that the number of lets should be at least as follows:

Max Number of Nights Per Year	Max Number of Lets Per Year
28	7
42	11

4.0 PARKING

4.1 To avoid adverse effects of VA relating to parking, I believe that parking for short term letting should be restricted to onsite parking only. This should include all registered vehicles including trailers (boats, jet skis etc), camper vans and caravans.

5.0 CONCLUSION

5.1 In conclusion I believe that the number of nights should be increased to 42 in line with the realistic opportunities that a primary residence could be let and that there should be no maximum number of lets over that period. If Council insists on a maximum then this should be consistent with the average night stay being 4 nights, the resulting maximum lets would therefore be 11 over 42 nights.