

2 July 2020

Avi Shrivastava
MBIE – Tourism Policy
Via email Avi.Shrivastava@mbie.govt.nz

Dear Avi

Short Term Rental Accommodation

We understand that an inter-agency Government group has been established to review Short Term Rental Accommodation (STRA). We fully support this direction.

The Accommodation Forum, comprising New Zealand's industry accommodation associations, has discussed STRA and below provides further detail on the areas discussed.

As you would expect there are other areas, e.g. contribution to costs such as rates, where there is a divergence of views. The latter items are not covered in this letter and would best be covered off in separate discussions with Forum members.

Definition

A clear definition of STRA is needed as part of this process. The definition should include all forms of short-term rental accommodation.

The Issue

While there are an increasing number of STRA options available in New Zealand, there are issues associated with:

- i) The lack of compliance and regulatory integration across the entire accommodation sector resulting in divergent regulatory regimes.
- ii) Inconsistent planning/regulatory requirements across Territorial Authorities.
- iii) A lack of data in relation to guest numbers and overnights, and guest experiences.

The Proposition

We propose and strongly advocate for a **central** government approach to the STRA sector based on the following principles:

- i) A compulsory registration/data sharing system that allows for information collection from all operators of STRA.
- ii) A regulatory framework which:
 - Creates a regulatory environment that is fair to participants across the entire accommodation sector.

- Provides the basis for consistent application of a national regulatory framework at a Territorial Authority level for planning and compliance purposes.
- A mandatory code of conduct to govern amenity issues, including the behaviours of guests and owners/operators.
- Promotes a safe and satisfied guest experience.

iii) Records the level of activity for data capture purposes.

Benefits

There are a range of benefits associated with such an approach, including:

- Consistent regulatory integration across the entire accommodation sector
- A consistent regulatory framework across all Territorial Authorities.
- A basis for active compliance.
- A positive guest experience that maintains and enhances New Zealand's visitor economy.

We look forward to discussing this with you but would also appreciate an indication from MBIE/Government on both process and indicative timelines.

Signed and supported by the following members of the Accommodation Forum:

Sally Attfield, Hotel Sector Manager, Tourism Industry Aotearoa
Fergus Brown, Chief Executive, Holiday Parks New Zealand
Eacham Curry, Director, Government & Corporate Affairs, Expedia Group
Shaun Fitzmaurice, Chief Operating Officer, Bachcare
Nick James, Owner, and Board Member of Bed & Breakfast Association New Zealand
Derek Nolan, Head of Public Policy (Au and NZ), Airbnb
Michael Osborne, Director, Marsden Group Limited, representing Apartments
Amy Robens, Executive Director, NZ Hotel Owners Association
Mark Wells, Chief Executive, YHA
Julie White, Chief Executive, Hospitality New Zealand