

Further Submission on NPDC's Notified Proposed District Plan

Response ID:34 Data

1. Further submitter details

1. Name of further submitter

Richard Woodd

2. Contact person (if different from above)

3. Email Address

The Council will serve all formal documents by email. Where there is no email address provided, the documents will be posted to the postal address stated below.

richardwoodd@yahoo.com.au

4. Postal Address

21 Gilbert St

5. Phone Number

0226583798

6. I am:

A person who has an interest in the proposal that is greater than the interest of the general public. (In this case, also explain the grounds for saying you fall in this category; or

7. Please state the grounds as to why you come within the category selected above.

Made a submission in the first round

2. Council Hearing

8. Do you wish to be heard in support of your further submission?

Yes

9. If others make a similar submission would you consider presenting a joint case with them at a hearing?

Yes

3. My Further Submission(s)

10. The specific further submissions in support or opposition and the decisions sought for NPDC's Proposed District Plan are as follows:

Please only insert one further submission point at a time, there is the ability to add additional points further down.

I support/oppose the submission of: (state the submission number, name and address of the person making the original submission)

Airbnb - Louise Trevena- Downing

Submission No./Point No. (of the original submission)

316.37

Provision

CCZ / Rules / CCZ-R7

Do you support or oppose the original submission?

Support

The reasons for my support/opposition are: (state the nature of your further submission, giving reasons)

Private STVAs are an important factor in attracting visitors to Taranaki and should be recognised as such by having adequate protection in the PDP, as a permitted activity.

I seek that the whole (or part) of the submission be allowed/disallowed (give precise details of the decision you want the Council to make)

Add a new rule as follows: Residential Visitor Accommodation

Activity status: PER

Where the maximum number of all guests per night is 6 adults, or two adults bedroom, whichever number is greater.

I support/oppose the submission of: (state the submission number, name and address of the person making the original submission)

Airbnb - Louise Trevena- Downing

Submission No./Point No. (of the original submission)

316.37

Provision

CCZ / Rules / CCZ-R7

Do you support or oppose the original submission?

Support

The reasons for my support/opposition are: (state the nature of your further submission, giving reasons)

Council has not explained what environmental effects of STVAs it seeks to 'avoid, remedy or mitigate'

I seek that the whole (or part) of the submission be allowed/disallowed (give precise details of the decision you want the Council to make)

Amend CCZ-R7 as follows:

Activity status where compliance not achieved: RDIS Controlled

Matters over which discretion is restricted: Control: The extent to which the proposed maximum number of guests is compatible with the surrounding [town centre/city centre] area.

1. The extent and effect of non-compliance with any Town/City] Centre Zone Effects Standards and any relevant matters of discretion in the infringed Effect Standard(s).
 2. The extent to which the scale and intensity of the activity may adversely impact on the character and amenity of the [town/city] centre, or adjacent residential properties.
 3. Whether any adverse effects can be avoided, or appropriately remedied or mitigated.
-

I support/oppose the submission of: (state the submission number, name and address of the person making the original submission)

Airbnb - Louise Trevena- Downing

Submission No./Point No. (of the original submission)

316.39

Provision

CCZ / Rules / New rule

Do you support or oppose the original submission?

Support

The reasons for my support/opposition are: (state the nature of your further submission, giving reasons)

Consider that a new rule should be added in the City Centre Zone that provides for Homestays as a permitted activity in all residential, rural, commercial/town/mixed use zones because the effects of renting a bedroom to a visitor are exactly the same as renting the room to a local resident.

I seek that the whole (or part) of the submission be allowed/disallowed (give precise details of the decision you want the Council to make)

Add a new rule as follows: Homestays
Activity status: PER

I support/oppose the submission of: (state the submission number, name and address of the person making the original submission)

Airbnb - Louise Trevena- Downin

Submission No./Point No. (of the original submission)

316.4

Provision

Definitions / LIVING ACTIVITIES

Do you support or oppose the original submission?

Support

The reasons for my support/opposition are: (state the nature of your further submission, giving reasons)

Oppose the definition for living activities. Amend to specifically exclude residential visitor accommodation and homestays.

I seek that the whole (or part) of the submission be allowed/disallowed (give precise details of the decision you want the Council to make)

Amend the definition for living activities as follows: Living activities means:
• Residential activities;
Excludes: Residential Visitor Accommodation and Homestays

I support/oppose the submission of: (state the submission number, name and address of the person making the original submission)

Airbnb - Louise Trevena- Downing

Submission No./Point No. (of the original submission)

316.2

Provision

Do you support or oppose the original submission?

Support

The reasons for my support/opposition are: (state the nature of your further submission, giving reasons)

Supports in part the definition for residential visitor accommodation but amend so that it:

- uses the defined term for "Residential Unit"
- excluded visitor accommodation and homestays
- relates to stays of less than 3 months (90 days) by any one guest. This amendment distinguishes the activity from other longer term tenancies where the Residential Tenancies Act 1986 applies.

I seek that the whole (or part) of the submission be allowed/disallowed (give precise details of the decision you want the Council to make)

Amend the definition for residential visitor accommodation as follows:

Residential visitor accommodation

means the use of a Residential Unit for temporary accommodation advertised for a tariff to by a paying guests that is secondary and incidental to the use of the house for a residential activity.

Excludes: Visitor Accommodation and Homestays.

I support/oppose the submission of: (state the submission number, name and address of the person making the original submission)

Airbnb - Louise Trevena- Downing

Submission No./Point No. (of the original submission)

316.3

Provision

Definitions / VISITOR ACCOMMODATION

Do you support or oppose the original submission?

Support

The reasons for my support/opposition are: (state the nature of your further submission, giving reasons)

Supports in part the definition for visitor accommodation but amend to specifically exclude residential visitor accommodation and homestays.

I seek that the whole (or part) of the submission be allowed/disallowed (give precise details of the decision you want the Council to make)

Amend the definition for visitor accommodation as follows:

means land and/or buildings used for accommodating visitors subject to a tariff being paid, and includes any ancillary activities,

Excludes: Residential Visitor Accommodation and Homestays.

I support/oppose the submission of: (state the submission number, name and address of the person making the original submission)

Airbnb - Louise Trevena- Downing

Submission No./Point No. (of the original submission)

Provision

FUZ / Rules / FUZ-R10

Do you support or oppose the original submission?

Support

The reasons for my support/opposition are: (state the nature of your further submission, giving reasons)

Supports in part rule FUZ-R10 (Residential visitor accommodation) but opposes permitted activity clauses

- Maximum of 6 guests per night – a 6 guest limit is arbitrary, not linked to the size of the home or the number of bedrooms.
- No more than 90 days per 12 month period – a 90 day limit is arbitrary, is not aimed at controlling any specific effects and serves no useful purpose.
- Vehicle movements – there is no evidence that the activity results in more traffic generation from that generated by a permanent residential occupant.
- Compliance with the zone standards – if there are specific standards that are relevant to accommodation then these should be specified as performance standards in the permitted activity rule. The s32 Report contains no analysis of why the proposed clauses are necessary, what they seek to achieve, what effects they are intended to control or what outcomes are sought (see general submission). Provides commentary on background to AirBnB and the benefits of short term rental accommodation.

I seek that the whole (or part) of the submission be allowed/disallowed (give precise details of the decision you want the Council to make)

Amend Rule FUZ-R10 as follows:

...

1. the maximum number of all guests adults per night is six adults people or two adults per bedroom, whichever number is greater;
2. the activity occurs for no more than 90 days in total per site during any 12 month period;
3. no more than 22 vehicle movements are generated in a 24 hour period for the combined visitor accommodation and residential unit;
4. no more than eight vehicle movements per hour are generated for the combined visitor accommodation and residential unit; and
5. all Future Urban Zone Effects Standards are complied with.

I support/oppose the submission of: (state the submission number, name and address of the person making the original submission)

Darren Baxter

Submission No./Point No. (of the original submission)

89.1

Provision

FUZ / Rules / FUZ-R10

Do you support or oppose the original submission?

Support

The reasons for my support/opposition are: (state the nature of your further submission, giving reasons)

Opposes rule FUZ-R10 (Residential visitor accommodation) as it/the:

- financially impacts landowners/businesses associated with the private accommodation industry • unnecessarily limits the number of people
- the perceived environmental issues are negligible (i.e. traffic effects)
- unnecessarily restricts accommodation and tourism options in the District
- risks tourism in Taranaki and the economic benefit/employment that the sector brings.

I seek that the whole (or part) of the submission be allowed/disallowed (give precise details of the decision you want the Council to make)

Amend Rule FUZ-R10 as follows:

...

1. the maximum number of all guests per night is six people;
2. the activity occurs for no more than 90 days in total per site during any 12 month period;
3. ...

I support/oppose the submission of: (state the submission number, name and address of the person making the original submission)

Airbnb - Louise Trevena- Downing

Submission No./Point No. (of the original submission)

316.43

Provision

FUZ / Rules / New rule

Do you support or oppose the original submission?

Support

The reasons for my support/opposition are: (state the nature of your further submission, giving reasons)

Homestays should be a permitted activity. The effects of renting a bedroom to a visitor are the same as renting the room to a local resident.

I seek that the whole (or part) of the submission be allowed/disallowed (give precise details of the decision you want the Council to make)

Add a new permitted activity rule to the Future Urban Zone as follows:

FUZ-RXX Homestays

Activity Status: PER

I support/oppose the submission of: (state the submission number, name and address of the person making the original submission)

Mike Myers

Submission No./Point No. (of the original submission)

282.1

Provision

General

Do you support or oppose the original submission?

The reasons for my support/opposition are: (state the nature of your further submission, giving reasons)

- Oppose rules LRZ-R6, GRZ-R6, MRZ-R6, RPOZ-R8 and RLZ-R10 (Residential Visitor Accommodation) as they/the:
- unfairly regulates private accommodation providers • unnecessarily restricts accommodation and tourism options in the District
 - lacks proper consideration/consultation
 - risks tourism in Taranaki and the economic benefit/employment that the sector brings
 - the perceived environmental issues are negligible (i.e. noise, traffic)
 - would impact the private accommodation industry • activity can be covered by existing rules (traffic, parking, noise, home business).
 - visitor accommodation should be more limited to the Medium Density and Rural Lifestyle Zones.

I seek that the whole (or part) of the submission be allowed/disallowed (give precise details of the decision you want the Council to make)

Amend rules LRZ-R6, GRZ-R6, MRZ-R6, RPOZ-R8 and RLZ-R10 as they are too broad brush and will have unintended consequences. More thought and consultation is required around this matter. The proposed rule(s) is clearly unfair when compared with other Business Users in residential areas.

I support/oppose the submission of: (state the submission number, name and address of the person making the original submission)

Airbnb - Louise Trevena- Downing

Submission No./Point No. (of the original submission)

316.12

Provision

GRZ / Rules / GRZ-R6

Do you support or oppose the original submission?

Support

The reasons for my support/opposition are: (state the nature of your further submission, giving reasons)

- Supports permitted activity status for rule GRZ-R6 (Residential Visitor Accommodation) but opposes permitted activity clauses 1-5:
- Maximum of 10 guests per night – a 10 guest limit is arbitrary, not linked to the size of the home or the number of bedrooms.
 - No more than 90 days per 12 month period – a 90 day limit is arbitrary, is not aimed at controlling any specific effects and serves no useful purpose.
 - Vehicle movements – there is no evidence that the activity results in more traffic generation from that generated by a permanent residential occupant.
 - Compliance with the zone standards – if there are specific standards that are relevant to accommodation then these should be specified as performance standards in the permitted activity rule. The s32 Report contains no analysis of why the proposed clauses are necessary, what they seek to achieve, what effects they are intended to control or what outcomes are sought (see general submission). Provides commentary on background to Airbnb and the benefits of short term rental accommodation.

I seek that the whole (or part) of the submission be allowed/disallowed (give precise details of the decision you want the Council to make)

Amend rule GRZ-R6 as follows:
Residential Visitor Accommodation

Activity status: PER

Where:

1.the maximum number of all adult guests per night is 10 people adults or two adult guests per bedroom, whichever number is greater.;

Delete remainder:

2.the activity occurs for no more than 90 days in total per site during any 12 month period;

3. no more than 22 vehicle movements are generated in a 24 hour period for the combined visitor accommodation and residential unit;

4.no more than eight vehicle movements per hour are generated for the combined visitor accommodation and residential unit; and

5.all [Low Density Residential Zone, General Residential Zone, Medium Density Residential Zone] Standards are complied with.

I support/oppose the submission of: (state the submission number, name and address of the person making the original submission)

Airbnb - Louise Trevena- Downing

Submission No./Point No. (of the original submission)

316.14

Provision

GRZ / Rules / GRZ-R6

Do you support or oppose the original submission?

Support

The reasons for my support/opposition are: (state the nature of your further submission, giving reasons)

Opposes restricted discretionary activity status for rule GRZ-R6 (Residential Visitor Accommodation) where compliance is not achieved with the permitted activity standards. Accommodation not complying with the permitted activity standards should default to a controlled activity. Opposes all the matters of discretion and request they are amended to focus on whether the number of guests proposed is compatible with the surrounding residential area.

I seek that the whole (or part) of the submission be allowed/disallowed (give precise details of the decision you want the Council to make)

Amend rule GRZ-R6 as described

I support/oppose the submission of: (state the submission number, name and address of the person making the original submission)

Anna Major

Submission No./Point No. (of the original submission)

18.1

Provision

GRZ / Rules / GRZ-R6

Do you support or oppose the original submission?

Support

The reasons for my support/opposition are: (state the nature of your further submission, giving reasons)

Opposes rule GRZ-R6 (Residential Visitor Accommodation).

I seek that the whole (or part) of the submission be allowed/disallowed (give precise details of the decision you want the Council to make)

Delete rule GRZ-R6 and Adopt a nationally led approach to regulating our industry

I support/oppose the submission of: (state the submission number, name and address of the person making the original submission)

Bach Break - Jo

Submission No./Point No. (of the original submission)

155.1

Provision

GRZ / Rules / GRZ-R6

Do you support or oppose the original submission?

Support

The reasons for my support/opposition are: (state the nature of your further submission, giving reasons)

Oppose rule GRZ-R6 (Residential Visitor Accommodation) as it:

- risks tourism in Taranaki and the economic benefit/employment that the sector brings
- lacks proper consideration/consultation
- impacts on homeowners' property rights
- unnecessarily controls an industry that is already self-regulating
- unnecessarily restricts accommodation and tourism options in the District
- drives up cost/inflates prices of holiday accommodation
- lacks evidence to support regulation
- data on the industry can be inaccurate
- is opposed by 3,000 people who have signed a petition against the proposal.

I seek that the whole (or part) of the submission be allowed/disallowed (give precise details of the decision you want the Council to make)

Delete rule GRZ-R6 in its entirety or amend to remove the 90 day cap in a 12 month period

I support/oppose the submission of: (state the submission number, name and address of the person making the original submission)

Bed & Breakfast Association New Zealand - Fiona Rollings

Submission No./Point No. (of the original submission)

314.1

Provision

GRZ / Rules / GRZ-R6

Do you support or oppose the original submission?

The reasons for my support/opposition are: (state the nature of your further submission, giving reasons)

Opposes rule GRZ-R6 (Residential Visitor Accommodation) as it/the:

- financially impacts landowners/businesses associated with the private accommodation industry • risks tourism in Taranaki and the economic benefit/employment that the sector brings
- unnecessarily restricts accommodation and tourism options in the District
- restricts small home based businesses that are already subject to a wide range of rules and regulations
- perceived environmental issues are minimal (i.e. noise, traffic and amenity effects)
- compromises local events
- would be difficult to enforce

I seek that the whole (or part) of the submission be allowed/disallowed (give precise details of the decision you want the Council to make)

Delete the 90 day cap

I support/oppose the submission of: (state the submission number, name and address of the person making the original submission)

Bev Ellice

Submission No./Point No. (of the original submission)

42.1

Provision

GRZ / Rules / GRZ-R6

Do you support or oppose the original submission?

Support

The reasons for my support/opposition are: (state the nature of your further submission, giving reasons)

Opposes rule GRZ-R6 (Residential Visitor Accommodation) as it:

- lacks proper consideration/consultation
- would be difficult to enforce
- risks the economic benefit that the sector brings
- fails to address housing, servicing and amenity concerns.

Consider alternative methods of regulation such as a short term holiday rental register, a mandatory short term rental code of conduct and an industry funded and administered body.

I seek that the whole (or part) of the submission be allowed/disallowed (give precise details of the decision you want the Council to make)

Delete the rule in its entirety

I support/oppose the submission of: (state the submission number, name and address of the person making the original submission)

Bookabach - Eacham Curry

Submission No./Point No. (of the original submission)

180.1

Provision

GRZ / Rules / GRZ-R6

Do you support or oppose the original submission?

Support

The reasons for my support/opposition are: (state the nature of your further submission, giving reasons)

Opposes rule GRZ-R6 (Residential Visitor Accommodation) as it:

- lacks proper consideration/consultation
- would be difficult to enforce
- will do little to manage community amenity issues associated with short term rental accommodation
- drives up cost/inflates prices of holiday accommodation and send valuable tourism dollars to other parts of the country
- unnecessarily restricts accommodation and tourism options in the District
- risk economic benefit/employment that the sector brings
- financially impacts landowners/businesses and staff associated with the private accommodation industry • unnecessarily limits the number of people
- impacts on homeowners' property rights
- lacks evidence to support regulation

I seek that the whole (or part) of the submission be allowed/disallowed (give precise details of the decision you want the Council to make)

Amend rule GRZ-R6 and work with the short term rental accommodation industry, community groups and central government to develop a NZ wide approach involving:

1. a short term holiday rental register
2. a mandatory short term rental code of conduct
3. an industry funded and administered body
4. planning controls which are carefully calibrated to address local planning issues, not issues addressed in other parts of the regulatory framework

I support/oppose the submission of: (state the submission number, name and address of the person making the original submission)

Brent Cathie

Submission No./Point No. (of the original submission)

138.7

Provision

GRZ / Rules / GRZ-R6

Do you support or oppose the original submission?

Support

The reasons for my support/opposition are: (state the nature of your further submission, giving reasons)

Opposes rule GRZ-R6 as

- unnecessarily controls an industry that is already self-regulating.
- lacks evidence to support regulation perceived environmental issues are negligible (i.e. noise, traffic and amenity effects)

I seek that the whole (or part) of the submission be allowed/disallowed (give precise details of the decision you want the Council to make)

Delete 90 day rule

I support/oppose the submission of: (state the submission number, name and address of the person making the original submission)

Business & Retail Association (BARA) - Michelle Brennan

Submission No./Point No. (of the original submission)

489.3

Provision

GRZ / Rules / GRZ-R6

Do you support or oppose the original submission?

Support

The reasons for my support/opposition are: (state the nature of your further submission, giving reasons)

Opposes rule GRZ-R6 (Residential Visitor Accommodation) as it:

- lacks proper consideration/consultation • would be difficult to enforce
- risks the economic benefit that the sector brings
- fails to address housing, servicing and amenity concerns.

Consider alternative methods of regulation such as a short term holiday rental register, a mandatory short term rental code of conduct and an industry funded and administered body.

I seek that the whole (or part) of the submission be allowed/disallowed (give precise details of the decision you want the Council to make)

Delete rule entirely or remove the 90 day cap

I support/oppose the submission of: (state the submission number, name and address of the person making the original submission)

Deb Tawa

Submission No./Point No. (of the original submission)

131.1

Provision

GRZ / Rules / GRZ-R6

Do you support or oppose the original submission?

Oppose

The reasons for my support/opposition are: (state the nature of your further submission, giving reasons)

Private homestays perform a valuable service in attracting visitors. These are residential land uses and should only pay residential rates. They are already subject to tax law. Negative impact on neighbourhoods is infinitesimal and on a par with normal renting.

I seek that the whole (or part) of the submission be allowed/disallowed (give precise details of the decision you want the Council to make)

Delete rule or remove 90 day cap

I support/oppose the submission of: (state the submission number, name and address of the person making the

original submission)

Taranaki Property Investors Association Inc - - Colin Comber (Comber Consultancy)

Submission No./Point No. (of the original submission)

495.1

Provision

GRZ / Rules / GRZ-R6

Do you support or oppose the original submission?

Support

The reasons for my support/opposition are: (state the nature of your further submission, giving reasons)

Opposes rule GRZ-R6 (Residential Visitor Accommodation) as it/the:

- lacks proper consideration/consultation
- unnecessarily controls an industry that is already self-regulating
- unnecessarily restricts accommodation and tourism options in the District
- perceived environmental issues are minimal (i.e. noise, traffic and amenity effects)
- financially impacts landowners/businesses associated with the private accommodation industry • lacks evidence to support regulation
- will result in RMA administrative inefficiency by the Council
- is not achieving the purposes (s.5) of the RMA.
- rating classification of a property which obtains consent under the proposed rule GRZ-R6 is not clear and should be clarified.

I seek that the whole (or part) of the submission be allowed/disallowed (give precise details of the decision you want the Council to make)

Delete rule GRZ-R6 in its entirety and attend to related consequential amendments.

I support/oppose the submission of: (state the submission number, name and address of the person making the original submission)

Airbnb - Louise Trevena- Downing

Submission No./Point No. (of the original submission)

316.17

Provision

GRZ / Rules / New rule

Do you support or oppose the original submission?

Support

The reasons for my support/opposition are: (state the nature of your further submission, giving reasons)

Requests the inclusion of a new rule that provides for Homestays as a permitted activity in all residential, rural, commercial/town/mixed use zones. This would include a new definition for Homestay. The effects of renting a bedroom to a visitor are exactly the same as renting the room to a local resident.

I seek that the whole (or part) of the submission be allowed/disallowed (give precise details of the decision you want the Council to make)

Amend General Residential Zone rules to include a new permitted activity rule for Homestays.

I support/oppose the submission of: (state the submission number, name and address of the person making the original submission)

Andrew Hooks

Submission No./Point No. (of the original submission)

191.6

Provision

MRZ / Rules / MRZ-R6

Do you support or oppose the original submission?

Support

The reasons for my support/opposition are: (state the nature of your further submission, giving reasons)

Opposes rule MRZ-R6 (Residential Visitor Accommodation) as:

- it is not adequately supported or explained in the Section 32 report
- it negatively impacts legitimate businesses without addressing the issue intended
- the activity makes up a small percentage of the rental market and the rule fails to address housing/rental concerns
- the activity uses less resources than houses lived full time
- it does not recognise the difference in resource/servicing use, rate charges and health and safety profiles between motels and stand-alone housing (on a per person basis).
- it unnecessarily restricts accommodation and tourism options/choice in the District.
- it unfairly targets private accommodation

I seek that the whole (or part) of the submission be allowed/disallowed (give precise details of the decision you want the Council to make)

Clarify the intent/improve of the definition of Residential Visitors Accommodation and amend rule MRZ-R6 by deleting the 90 day cap

I support/oppose the submission of: (state the submission number, name and address of the person making the original submission)

Jenny Brooking

Submission No./Point No. (of the original submission)

142.1

Provision

MRZ / Rules / MRZ-R6

Do you support or oppose the original submission?

Support

The reasons for my support/opposition are: (state the nature of your further submission, giving reasons)

- perceived environmental issues are minimal (i.e. noise and amenity effects)
- restricts accommodation options in the District.

I seek that the whole (or part) of the submission be allowed/disallowed (give precise details of the decision you want

the Council to make)

Retain status quo for holiday accommodation.

4. Note To Further Submitter

A copy of your further submission **MUST** be served on the original submitter with 5 working days after it is served on the local authority. Contact details for all submitters can be found on the Proposed District Plan page of the NPDC website.

Please note all information provided in your submission, including your personal information, will be made publicly available.

Your submission (or part of it) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of it):

it is frivolous or vexatious,

it discloses no reasonable or relevant case,

it would be an abuse of the hearing process to allow the submission (or the part) to be taken further,

it contains offensive language,

it is supported only by material that purports to be independent expert advice, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

11. I understand that details of my submission will be made publicly available and I must serve a copy of my further submission to the original submitter within 5 working days of making my further submission.

I understand

5. Thank You!

Thank you for your further submission. Formal acknowledgement of your further submission will be provided once processed and accepted by Council.

Email a copy of my further submission(s)

Aug 22, 2020 22:24:15 Success: Email Sent to: richardwoodd@yahoo.com.au