

The background of the entire image is a blurred photograph of a city street, likely in Manchester, viewed through a glass surface covered in numerous water droplets of varying sizes. The droplets are in sharp focus, while the background shows out-of-focus buildings, trees, and streetlights.

# **Short Term Rentals in Manchester: Time to Act?**

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*We would like to thank Murray Cox  
from Inside Airbnb for the data, Jaime Jover, Joe Chambers,  
and the residents of Moss Side, Northern Quarter and  
Fallowfield for their contributions.*

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This report has been produced by members of Greater Manchester Tenants Union (GMTU) and Greater Manchester Housing Action (GMHA) with support from key individuals. Collectively, we have come together to form a Citizen Taskforce to help tackle the problem of the short term rental sector in Manchester.

## Executive Summary

Airbnb began as an online platform enabling people to provide accommodation to visitors in their own homes. It is the biggest and best known of the digital marketplace companies, which now operate all over the world as an alternative to traditional forms of board and lodging.

The original Airbnb image was of hosts renting out a spare room for a few nights to a curious traveller. Today however, 'hosts' are far more likely to be professional landlords, supported by an industry of service providers. The company has become a symbol of neighbourhood gentrification, community displacement and skyrocketing rents.

The single-room let - central to the company's 'home sharing' narrative - makes up just 8% of Airbnb listings globally.<sup>1</sup> Another 59% is professional accommodation offers, a figure which rises to 92% if entire-home rentals and multiple room listings are included.<sup>2</sup> Analysts suggest that commercial landlords generate by far the greatest revenue for Airbnb, with 'home sharing' accounting for only 12.5% of revenue according to one recent study.<sup>3</sup>

These dynamics are being played out in Manchester, with non-trivial consequences. As this report demonstrates, the proliferation of short term rentals (STRs) is a key contributing factor to the local housing crisis.

### Our research has found:

- ❖ A three-fold increase in the number of listings, and an increase in the number of entire properties listed on Airbnb in Manchester by a factor of four, from 2016 to 2020, with an average of 263 entire properties being added each year.
- ❖ That should the short term letting industry recover from the pandemic, this level of growth will cause a significant loss of housing stock that could shut out 9,410 residents over a decade (using the Greater Manchester average household size of 2.33).
- ❖ That short term rentals are increasingly professionalised: at least 54.9% of all Manchester Airbnb listings are by landlords with more than one property.
- ❖ That the city has a well-developed STR management company industry, another clear sign that the short-term lettings market is largely a commercial operation.

Pat Karney, Manchester City Council spokesperson for the city centre and head of their STR task group, said in 2019: “We are totally opposed to big business Airbnb operators”.<sup>4</sup> But in keeping with the all the research on comparable cities, this report confirms that big business providers already dominate the Manchester STR market, and before the pandemic, their numbers were continuing to grow rapidly.

This research details the impacts of Airbnb and like companies on the availability of housing, as well as on quality of life of residents and the cost to the local authority (and taxpayer) of mitigation. It reviews action taken so far by Manchester City Council, the success of solutions tried elsewhere, and the options currently open to local authorities in England. We make the following recommendations for immediate action:

- ❏ Ensure adequate resources to enforcing planning laws and handling noise, rubbish and nuisance complaints.
- ❏ Meet with local residents, community groups and others affected by STR and keep them regularly updated on what is being done to curb nuisance and safeguard their neighbourhoods
- ❏ Provide a named main point of contact for residents who are adversely affected by STRs, to provide all necessary support and advocacy. This should include proactively communicating with neighbours when the Council becomes aware that a host-absent entire house let is in operation.
- ❏ Produce a public strategy outlining actions to date, outcomes, aims and a timetable of future action, including details of any research or lobbying the Council has undertaken and what response they have had.
- ❏ Continue to impose and enforce bans on STRs in new residential developments, to reduce further loss of social and affordable housing in particular, wherever they can legally do so.
- ❏ Minute and make public all discussions with STAA, Airbnb, or their lobbyists.
- ❏ Set up a database of short term lettings and encourage Manchester residents to feed in local intelligence. Make this information accessible to relevant council departments.
- ❏ Reject the solutions most often put forward by Airbnb and its partners that have been tried, tested and found wanting. Namely, an annual cap on the number of days that a property can be rented out; and a voluntary code of conduct or ‘considerate lettings charter’. Caps are not enforceable, while lettings charters - more a substitute for regulation than a regulatory response - are inappropriately targeted and insufficient to tackle any of the dimensions to the current problem.

Current attempts by cities across the world to regulate and negotiate with Airbnb and its imitators are met with extensive legal obfuscation, refusal to provide useful data and non-co-operation in removing illegal listings.<sup>5</sup> To have any chance of stopping the continued loss of housing to STRs, Manchester's political leaders and their Greater Manchester allies must therefore also lobby national government to facilitate a properly enforceable regulatory approach with the following elements:

- ▣ A mandatory registration system requiring hosts to apply for a council permit or license for entire-home listings;
- ▣ Binding platform accountability rules, such that platforms can only accept advertisements and transactions from registered hosts;
- ▣ Compulsory data disclosure and monitoring of platforms to ensure the above;
- ▣ Local authority powers to refuse STR permits in defined 'Short-Term Let Control Areas'

A key theme in this report is the importance of including local residents and stakeholders in STR strategy discussions and working with them, including via the Citizen Taskforce, to generate the necessary intelligence, momentum and public buy-in for change.



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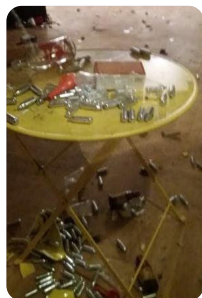
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## 1

## Introduction

It is New Year's Eve, 2020. Like most of the country, Manchester is under Tier 4 restrictions - the equivalent to 'full lockdown'. People are told to remain at home and not mix with anyone outside of their household, with few exceptions.

Yet on a small terraced residential street in South Manchester, approximately 50 people are attending a party in Airbnb accommodation advertised for 12 people. The property was recently a three-bedroom end-of-terrace family home, now converted. Cars and taxis come and go late into the night, loud music plays, and partygoers spill out into the street and onto the flat roof of the extension, carrying the indoor furniture. The police are called at midnight, but fail to disperse the guests, until further calls at 3am finally succeed in ending the party.



Photographs by a shocked neighbour the next day show hundreds of used 'laughing gas' canisters throughout the property, indoor furniture damaged, and a knife blade on the pavement outside.

Manchester City Council issues a 'premises closure warning' on the property. Yet despite the owner's clear inability to control his guests, the distress caused to neighbours, the damage to his property and the threat of a closure notice, ten weeks later the same landlord lists a new property on Airbnb, again letting to 12 people, just 100 yards away. The party house in question, meanwhile, is still operating as an Airbnb at the time of writing.



This example is only unusual because the party was held in the middle of a pandemic and thus lock-down powers could actually be used to end the party and issue a warning. It helps us understand the anxiety, anger and frustration of residents whose areas are being transformed by short term lets, and highlights the seeming inability of local leaders to protect neighbourhoods and housing under existing legislation.



This report examines the growth and impact of short-term rental (STR) platforms such as Airbnb on the city of Manchester. The rapid growth in entire-house Airbnb listings is associated with a range of problems that require further research and council action, including displacement of permanent residents, potential rent inflation, anti-social behaviour and pressures on neighbourhood services. We are particularly concerned about the consequences of properties being withdrawn from the long-term rental market at a time when long-term residents, Mancunians old and new, face a shortage of suitable housing.

There are more than 6,500 households in priority need on the housing register in Manchester, many of them waiting years for a home they can afford. Yet the number of Airbnb listings in the city tripled to 2,820 between 2016 and 2020, consisting of 1409 entire properties and occupying space that might have otherwise housed an estimated 3283 long-term residents (based on Greater Manchester occupancy rates of 2.33 per home.) So far, there has not been sufficient acknowledgement by Manchester City Council of the role of the STR sector in Manchester's housing crisis, nor sufficient engagement with impacted communities.

This report aims to demonstrate the nature and scale of the challenges arising from the growth of entire-house STR, and to galvanise effective action to control it. We hope to stimulate debate and action which will support other UK towns and cities which are suffering in a similar way.

### What we mean by a 'platform'

Since the financial and economic crisis of 2008, web-based or digital platform businesses such as Airbnb, Uber and Deliveroo have transformed the worlds of transportation, accommodation, food delivery and employment.

However, their claims to represent a new source of economic growth, flexible work and environmentally sustainable activity through 'leveraging under-used assets' have been largely dismissed. Airbnb and similar STR platforms are associated with **housing shortage, tourism, taxation and urban disruption** and have led to social movement opposition and local attempts at regulation. Airbnb is not the only STR platform operating in Manchester, with companies such as VRBO and Booking.com offering similar services, but it is by far the largest.



Manchester City Council established a ‘task group’ in March 2019 to consider how to deal with the issue of short term lettings. A meeting paper from January 2020 states “The small task group of Members and Officers has met a number of times and developed an action plan around the areas the Council currently has power and influence.” <sup>6</sup>

Manchester City Council has sought to prevent new homes on land it owns in Brunswick, South Manchester, from being turned into STRs by including restrictive covenants and clauses within the leases and freeholds which will remain in place when the properties are sold on. They place tight controls on lettings and ensure that homes will remain lived in by families. The Council did this out of concern that a regeneration development intended to provide more than 500 family homes would end up in the hands of the STR sector. This has certainly been a positive step. Its Private Rented Sector Strategy 2020-2025 states that the Council was seeking legal advice on how this could be applied elsewhere. <sup>7</sup>

Additional to this, there have been a number of limited but highly publicised attempts to tackle individual Airbnb ‘party flats’ in the city centre, and proposals to draw up a “Considerate Short Term Letting Charter” setting out best practice for hosts, the weakest of all possible regulatory approaches to the sector. <sup>8</sup>

We are aware that the council has opened its door to the STAA; a lobby organisation which has the explicit purpose of promoting the industry. There has been little equivalent action to consult regularly with affected residents and their organisations.

We are concerned that without a far more open and participatory process, with full involvement of affected communities, Council efforts to tackle the issue of Airbnb and short-term lets will fall short.

The Covid-19 pandemic adds urgency to the need to deal with the STR issue. Rental platforms such as Airbnb are in a state of reconfiguration, as tourist markets are disrupted. For example, in 2020 there was evidence of a modest shift of STR units back to the residential housing market in cities including Manchester, suggesting that Airbnbs might be increasingly used for ‘medium term lets’. <sup>9</sup> It is too soon to tell whether this is part of a longer-term trend of decline or will reverse when the pandemic is over.

Post-Covid, there have been calls in cities around the world to seize the moment, while tourist demand is low, to ‘reset’ priorities and put residents first. In Lisbon,

this led to a city takeover of Airbnb properties on long-term tenancies to let to social housing tenants. Here in Manchester there has been no open discussion of what the political strategy should be, neither before the pandemic, nor since.

This is a watershed moment for digital platforms, whose contribution to society, governance and future are the subject of increasing global scrutiny and debate. Airbnb's recent Initial Public Offering (IPO) represented a chance for the company itself to step back and reconsider some of its practices.<sup>10</sup> Now is the time for a serious, detailed public assessment of its place and responsibilities in Manchester. We have an opportunity to take the initiative back into the hands of politicians and communities, rather than continuing to react piecemeal to the problems thrown up by the unfettered growth of Airbnb and its imitators.

## 2

## How Airbnb reinforces the housing crisis

### 2.1

### What is Airbnb?

Airbnb is the biggest and most famous of the digital ‘platform’ businesses which emerged around the time of the global economic crisis of 2008/2009. Between 2009 and 2015 there was great optimism about what their new ‘collaborative’ or ‘sharing’ economy might offer. Airbnb contrasted its model with big hotels and corporate tourism. It promised that its travellers would ‘live like locals’, redistributing income from tourism centres to stimulate neighbourhoods across cities, and increasing cosmopolitanism. It has taken over a decade for a proper understanding of the impacts of these digital platforms to develop, during which time businesses have enjoyed institutional support from important layers of government such as the EU and the UK parliament, as well as in many local regions and cities, thanks to effective lobbying.<sup>11</sup>

After several failed launches, Airbnb won significant funding from tech investors and venture capitalists, and scaled rapidly between 2008 and 2020. It continued its efforts to expand exponentially despite the extra-legal or illegal status of short term rentals in many countries, right up till the year prior to Covid-19. In 2018-2019 it saw an estimated 22.6% rise in active listings.<sup>12</sup> In 2020 Airbnb’s site listed more than seven million flats and houses in more than 100,000 cities. Its net revenue in 2019 was \$4.8m, making it the second largest platform business after Uber.<sup>13</sup> Like Uber, it was not making any profit: between 2015 and 2019 it posted an average net loss of \$209m (\$674m in 2019).

Finally, the company went public with an IPO in December 2020, with stock doubling in value over the first week to around \$75bn.<sup>14</sup> This investor enthusiasm is in spite of the impact of Covid-19 leading to increased losses: in the nine months to September 30th 2020 the company lost even more than usual: \$697m. Yet a rapid rebound in terms of bookings as travel restriction measures ease is widely expected, and investors continue to have confidence in the business.

## 2.2

### The myth of the sharing economy

Airbnb continues to promote the 'sharing economy' narrative. But eleven years on, this founding mantra has worn thin. The core claim that it allows people to 'share' parts of their homes that might otherwise not be used, or when they are unable to live there continues to run through all the company's promotional materials and its media defence. But the proportion of listings on the platform which correspond to the sharing narrative are tiny.

Those that are just single rooms, which are central to Airbnb 'home sharing' marketing, make up fewer than one in ten listings (8%) globally. Another 59% are professional accommodation offers, a figure which rises to 92% if entire home rentals and multiple room listings are included.<sup>15</sup> Analysts suggest that commercial landlords generate by far the greatest revenue for Airbnb, with 'home sharing' accounting for only 12.5% of revenue according to one recent study.<sup>16</sup>

Furthermore, these estimates mask a complex reality of regulatory evasion by professional landlords, ranging from 'ghost hotels', private room listings that comprise many rooms in a single apartment or home, to the creation of multiple profiles on the platform by the same business, which is particularly difficult for city authorities to regulate.<sup>17</sup>

#### Who profits from Airbnb?

**Airbnb is valued at \$4.7 billion.** The company is generally not controlled or taxed by local or national governments, though it pays corporation tax in Ireland. Furthermore, many Airbnb landlords are not taxed on their income streams as if they were a company. Yet cash-starved councils are often forced to pick up the overheads of their operations: increased rubbish, noise and disruption which require mitigation as well as the need to devote scarce resources to monitoring infringements and enforcing regulation.

## 2.3

### Impacts on housing stock

The impact of the growth of STRs on towns and cities has been significant in many countries. Worst affected are cities with a pre-existing shortage of affordable housing for residents, and those experiencing dramatic increases in visitor numbers due to greater mobility in the last two decades. Despite the pandemic's impact, there

remain almost 90,000 listings in London, 60,000 in Paris and 50,000 in New York (see Table 1), while smaller cities such as Berlin, Rome, Amsterdam and Barcelona have tens of thousands of listings.

Table 1: City-level Airbnb listings data snapshot <sup>18</sup>

City	No. of listings (room or entire home/apartment)	Entire homes/ apartments	High availability
London	87,235	56.0%	40.4
Paris	59,881	86.8%	28.2
Berlin	22,552	47.5%	28.2
Athens	9,122	87.8%	87.4
Dublin	9,437	49.4%	27.2
Rome	29,436	64.0%	87.5
Venice	8,469	76.5%	84.0
Lisbon	22,242	74.1%	84.9
Barcelona	18,302	48.7%	67.1
Madrid	17,301	64.7%	59.0
Toronto	23,524	64.5%	44.1
Sydney	36,662	62.5%	34.0
Rio de Janeiro	35,887	71.4%	60.1
Buenos Aires	18,222	74.9%	68.5
Mexico City	17,229	48.2%	82.1*
New York City	50,378	52.1%	52.3*
San Diego	11,922	69.7%	66.3*
Cape Town	21,923	75.9%	75.0*
Beijing	25,921	59.1%	86.7*
Tokyo	10,081	64.1%	87.6*

Many of these listings are 'entire homes', which can be booked for a high total number of nights over the course of the year, suggesting that they might otherwise be used for permanent housing. As Manchester becomes an increasingly popular tourist destination (now the third most popular city in the UK for staying visits by inbound visitors), and faces an under supply of suitable housing for renters, it is following the trajectory of those cities which have struggled with high numbers of short term lettings.

While entire-house STR still accounts for a small share of residential property, the phenomenon is helping to intensify the commodification of housing, elevating housing's value as a commodity over all other uses, including, most significantly, its use as a home.

STR markets are more lucrative than regular rentals – a landlord will make a higher return on a short-term let than on a regular long-term let (see below). This encourages switching of housing stock to STR, as well as the practice of artificially inflating the value of properties under the assumption that STRs can continue to increase in number exponentially. This moves prices out of reach of local residents looking to rent or to buy.

The loss of rental housing stock creates further shortage, which encourages landlords to raise rents further, normalising high rents and causing prices to rise even more. Thus Airbnb and other short term rentals contribute to housing unaffordability in the city at large. While housing markets are complex and STR far from the only factor causing problems of affordability, there is increasing evidence of its contribution to the housing crisis.<sup>19</sup>

A growing body of work nationally and internationally is documenting Airbnb's impact on available long-term rental options and the cost of housing, and its role in the displacement of long-term residents. The problem is often very localised, with Airbnb properties clustering in particular neighbourhoods. One recent study found half of some Barcelona streets were STRs, a phenomenon of concentration that is now visibly underway in parts of Manchester. Along with price rises, disruption caused by visitor lifestyles contributes to the feedback loop of localised STR proliferation.

1

*Loss of housing  
for long-term  
residents*

2

*Burden on  
public services  
(rubbish etc.)*

3

*Tax burden -  
reduction in council  
tax and business  
rates*

4

*Antisocial  
behaviour, noise,  
disruption*

5

*Concerns around  
safety*

6

*Unfair competition  
with traditional  
accommodation  
providers*

The main criticisms of short term letting using online platforms such as Airbnb pertain to the rapid transformation of housing stock and the associated displacement of long-term residents, often accompanied by the acceleration of tourism and unplanned skewing of the local economy.<sup>20</sup> There are concerns about taxation arrangements, unfair competition with traditional accommodation providers, discrimination on the platforms, and threats to resident safety and security.

Airbnb and its lobby groups suggest that the complaints that matter relate to a few 'bad apples' who cause persistent nuisance. But the trajectories of other cities, and the data we have from Manchester, show the problems go far wider than just anti-social behaviour. The next section will examine the impact that STRs are having on Manchester.



# 3

## Airbnb in Manchester

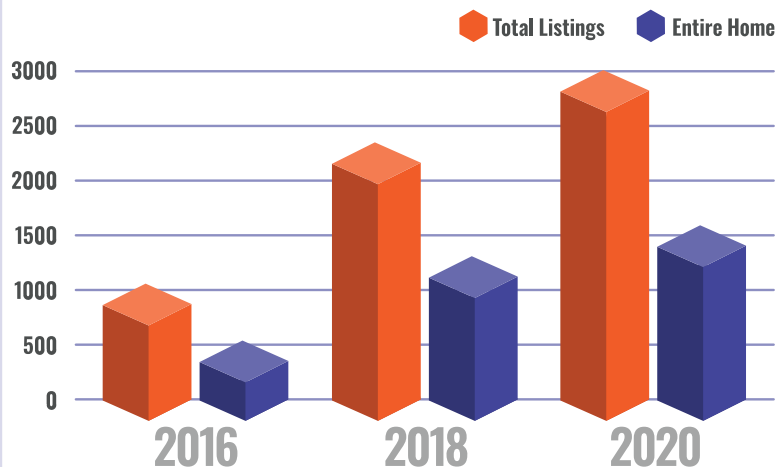
### 3.1

### The overall impact of Airbnb properties in Manchester

The growth of Airbnb in Manchester mirrors that of similar cities across Europe and North America. Airbnb has consistently refused attempts by governments to share its data, but pressure group Inside Airbnb analyses publicly available information and provides filters and metrics to reveal how the company is competing with the residential housing market.<sup>21</sup>

#### Figure 1

*Growth of Airbnb listings in Manchester 2016 - May 2020  
(source: Inside Airbnb).*



Overall, the data showed sustained growth of properties listed on Airbnb in the city even into the beginning of the Covid-19 pandemic. Numbers rose from 865 Airbnb listings in May 2016 (with 357 entire properties) to 2,159 listings (with 1,103 entire properties) in 2018, to 2,820 listings (with 1,409 entire properties) in May 2020.

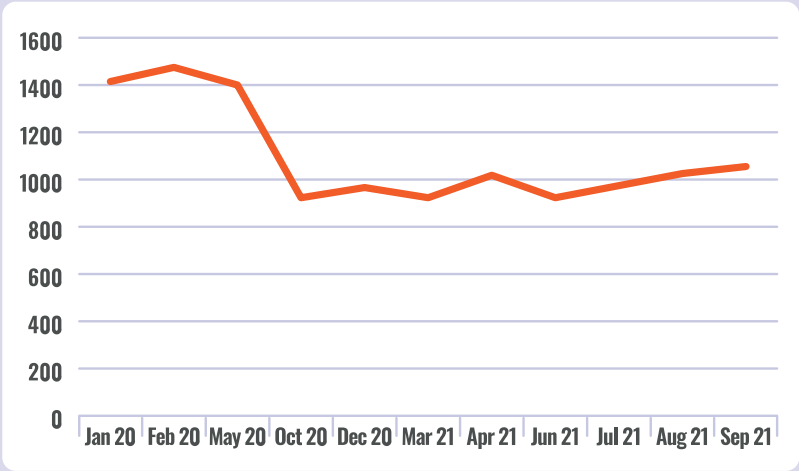
This corresponds to more than a tripling in the number of all Airbnb listings, and nearly a quadrupling for entire properties, demonstrating an increasing pattern of dominance by professional landlords. (Figure 1).

### 3.2 The Impact of Covid Pandemic on Short Term Lets in Manchester

Our analysis of Rightmove and Airbnb data during the first lockdown suggested a modest proportion of STRs were placed back on the long-term rental market. Data from Inside Airbnb shows how the number of entire properties listed on Airbnb fell by just over a third as the pandemic progressed and then remained stable (Figure 2).

**Figure 2**

*Impact of pandemic on short term let entire properties listed on Airbnb in Manchester: January 2020 - September 2021*  
(source: Inside Airbnb).



These have slowly risen each month since the summer of 2021, coinciding with the ending of most of the restrictions. As of September 2021, the number of entire properties listed on Airbnb stands at 72% of the pre-pandemic figure of 1,472 properties in February 2020.

Whilst there is talk of a post pandemic travel boom, only time will tell of the impact that the economic crisis has had on tourism, and the full extent to which short term letting will bounce back. However, this report assumes that eventually short term letting will return to a similar degree and rate of growth as before the pandemic.

### 3.3

## Impact of Short Term Lettings on Housing Supply in Manchester

The number of entire properties on Airbnb had risen from 357 in May 2016 to 1,409 by May 2020. This equates to an average growth of 263 new properties per year being listed on Airbnb in Manchester. After May 2020 the listings fell sharply as the pandemic progressed and prolonged restrictions took their effect on tourism. Assuming eventual recovery from the pandemic, we have estimated how many houses could be lost to STR use over a four year period and a decade in Manchester. We have assumed a return to 1409 properties (using the May 2020 figure before the impact of the pandemic took hold as the baseline), and have used the prepandemic trend of an additional 263 properties being listed every year in Manchester on Airbnb to calculate the following:

Over a four year period we would see a total of 2461 entire properties listed. These would otherwise provide housing to 5,734 permanent residents (using 2.33 people as average household size).

Over a ten year period, we would see a total of 4039 entire properties listed. These would otherwise provide housing for 9,410 permanent residents. (using 2.33 people as average household size).

These figures are likely to be an underestimate as they are only based on data provided by Inside Airbnb, which analyses listings from Airbnb only. There are other online platforms operating in Manchester that also list entire properties. Whilst the rate of growth in the future may differ from our estimate, the pattern of rapid housing loss to STR use has been demonstrated in cities across the world (see Table 1).

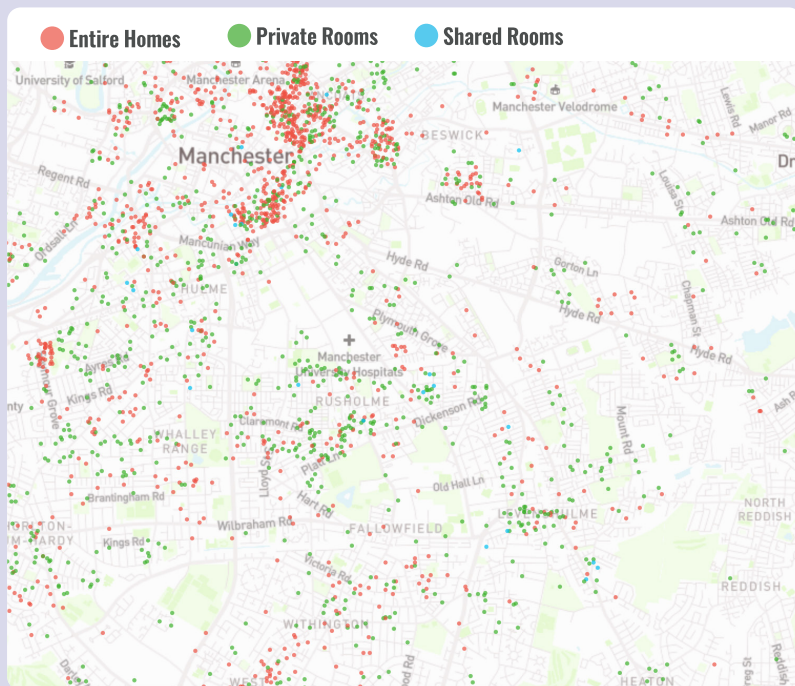
According to Shelter in 2019, there were 13,466 households on the social housing waiting list.<sup>22</sup> The number of houses lost to STR use over a decade would equate to 30% of that. Will we see our social housing waiting lists continue to rise whilst long-term housing stock is transferred to more lucrative STRs? The increase in short-term rentals raises not only concern for the loss of housing, but also for the clustering of STRs and how they can make particular areas unpleasant to live in.

### 3.4 Distribution of properties

Airbnb listings are not evenly spread across the city. They cluster in particular neighbourhoods, especially in and around the city centre and its tourism infrastructure (Figure 3).

**Figure 3**

*Spatial distribution of Airbnb properties in Manchester, November 2018 (Source: InsideAirbnb)<sup>23</sup>*

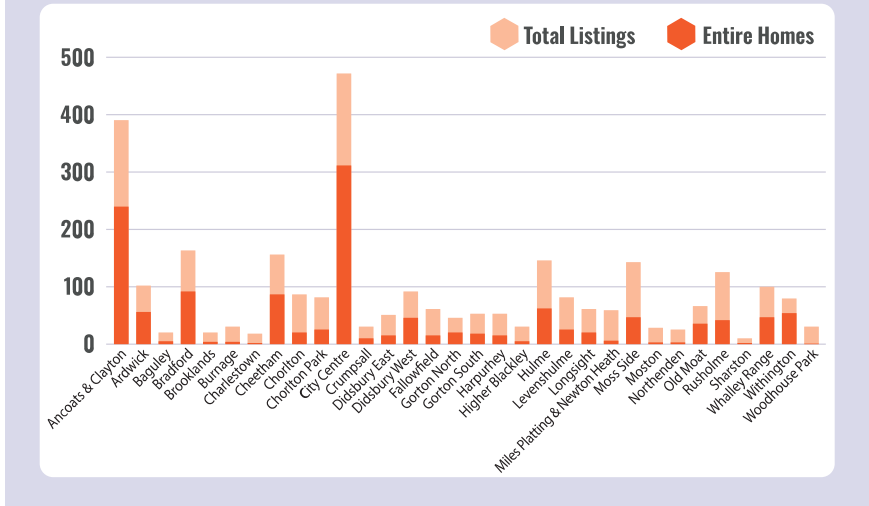


Data from Inside Airbnb\* taken from May 2020 shows that before the effects of the pandemic on STRs took place, areas with the highest number of Airbnb listings were in the city centre with 462 (including 305 entire properties), and the wards of Ancoats and Clayton which adjoin it, with 386 listings (including 237 entire homes) (Figure 4). Collectively, this central stretch has seen 542 entire properties taken out of the long term rental market, which could equate to homes for more than 1,250 residents.

\*Inside Airbnb data still uses the former Manchester ward boundaries that were in place prior to 2018.

Other inner-city neighbourhoods with high numbers of Airbnb listings, themselves clustered on particular streets (Figure 4), include Cheetham Hill (with 153 listings; 85 entire homes), Hulme (143 listings; 61 entire homes), Moss Side (with 140 listings; 46 entire homes), and Rusholme (123 listings; 41 entire homes).

**Figure 4** *Airbnb properties at neighbourhood level (total listings vs entire homes) May 2020 (Source: Inside Airbnb)*

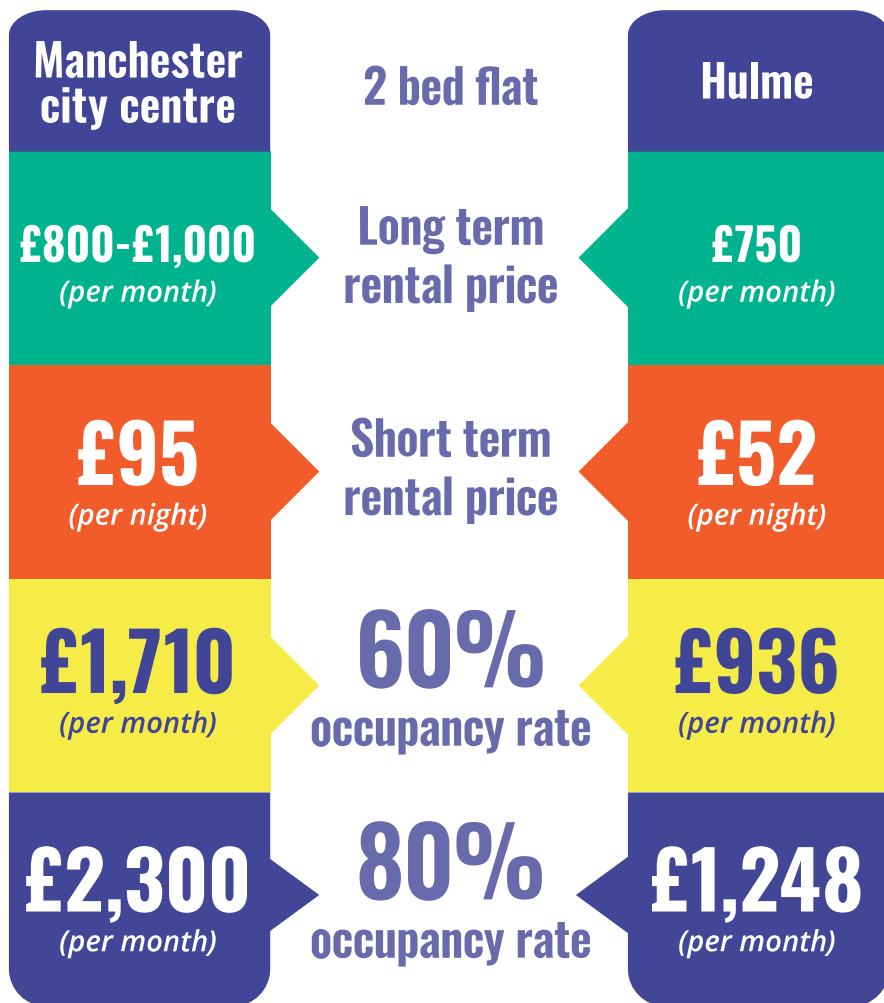


If the pre-pandemic growth rates return in Manchester, inner-city neighbourhoods will be increasingly impacted by STRs, with associated hikes in sale prices and the cost of renting in general. This would match the negative impacts seen in other global cities.

**The landlord incentive**

The potential to generate more rental income through STRs than long term tenants is driving the growth of the sector. Inside Airbnb data from October 2020 illustrates this underlying dynamic. In Manchester city centre the average cost is £95 per night for a 2-bed flat. A 60% occupancy rate, would generate £1,710 per month. This compares to a long term rental price of £800-£1,000 per month. If the occupancy was 80% for the month, the landlord would more than double their take to £2,300.

In Hulme the average cost is £52 per night. At 60% occupancy a landlord could expect to generate £936 per month, instead of a rental income of around £750. Even with relatively low occupancy rates, there are significant gains in ‘flipping’ long-term rental properties into Airbnbs.



The higher rents possible through STR has brought in a large number of professional landlords whose properties could instead have housed long-term residents. Hosts with multiple listings are more likely to be running a business and unlikely to be living in their property and letting an otherwise empty room to guests. If in London, they are more likely to be violating the 90-day rule (see page 44).<sup>24</sup> Inside Airbnb data from October 2020 indicates that 54.9% of all Manchester listings were owned by landlords with more than one property.

Manchester landlords include 'Sam', who has 21 properties in the city centre and the South Manchester wards of Fallowfield and Withington; and 'Scott', with 18 properties around the city centre. With a 60% occupancy rate on his properties, 'Sam' could be generating £28,000 per month, or nearly £37,000 at 80% occupancy. The

widespread landlord practice of creating more than one profile and using multiple platforms to advertise means that these are probably an underestimate.

### 3.5

## Management companies

Manchester's STR sector is sufficiently lucrative to support a highly developed industry of 'management services' companies, who relieve landlords of the need to be the kinds of hands-on 'hosts' projected in Airbnb 'sharing economy' marketing. Landlords making use of these companies have no need to meet guests, exchange keys, clean, or arrange bookings on the platforms. Instead, the service providers professionally photograph properties, maintain and renovate them, and even can be asked to identify or purchase new properties on behalf of clients for transformation into STRs.

We found three locally-based firms operating in Manchester, Airb 4 Me, Bee Hosting and Stay Happy, alongside established corporates Guestready, Houst, Portico Management, Aircompare, Bnblord, Hello Guest, Rentals Hosted.com, Pass the Property, Pass the Keys and City Superhost. Most offer to list property on multiple sites (typically Airbnb, Booking.com, Expedia, Rightmove, Zoopla and VRBO), some of which offer dynamic pricing. This can as much as double a landlord's rental yield. The introduction of professional management companies makes it harder for landlords offering a single room, or who are genuinely temporarily absent from their homes, to remain competitive.<sup>25</sup>

Use of multiple sites to list parts of the same property means that data gathered by analysts such as Inside Airbnb and AirDNA for entire-home rentals is likely to considerably underestimate the number of STRs in Manchester. It will also underestimate the number of nights that flats are available for, and booked. This means that the pattern of commercialisation of Airbnb properties in Manchester is considerably more entrenched than it already appears. It highlights the difficulty that authorities have in monitoring STRs. Capping the number of nights per year that a property can be let is the solution most commonly suggested by Airbnb in the face of regulatory pressure. Yet without a system of licensing, platform accountability for illegal listings, and enhanced resources for detecting breaches of the guideline, it would, as in London, prove fairly futile.

The growth of management companies shows quite how far the original Airbnb 'spare room' concept has shifted. Without a regulatory approach that directly addresses the conversion of permanent homes to STRs, and adequate means of enforcement, the commercial STR sector will continue to expand.



## 4

## Impacts on Manchester neighbourhoods

Inside Airbnb provides an essential toolkit for tracking city-wide data on STRs down to the neighbourhood scale. But local knowledge adds extra detail and conversations with residents are essential to avoid misunderstanding the rapid changes taking place, their everyday impacts, and the sense of anger and powerlessness of Mancunians facing them.

The next section draws on research carried out by long-term residents of Manchester who were motivated by their experiences to make a difference for the rest of the city. This ongoing work involves engaging neighbours and local community groups, assessing changes to streets, and keeping abreast of the rapid purchasing of homes by Airbnb and other STR landlords – work we hope will be recognised as vital to a renewed City Council response to STRs. We present this evidence in relation to Moss Side and the Northern Quarter, two very different neighbourhoods which strikingly illustrate the problems associated with entire-home short-term lets.

### 4.1

### Moss Side Case Study

Once home to novelist Antony Burgess, and the birthplace of suffragette Emmeline Pankhurst, Moss Side is now a relatively densely populated inner-city ward of around 19,000 people. It is an ethnically diverse and working class residential neighbourhood. The East section, close to the University of Manchester, comprises mainly two and three bedroom Edwardian terraced housing with a mix of social, privately owned and privately rented housing. The West section, encompassing the Alexandra Park Estate, has more modern social rented and privately owned homes, with some low rise flats.

STRs have been increasing in Moss Side for five years. Its attraction lies in its location and the nature of its housing. Properties are still relatively cheap to buy, benefit from no parking restrictions, and can be (made) big enough to accommodate large groups. Moss Side is also within walking distance of the city centre, has easy access to the airport, football stadiums, and is close to the universities and hospitals.

We chose to focus on Moss Side because of the pre-existing pressures on family housing. Over a number of years, due to its proximity to the university, there has been a steady conversion of houses into houses in multiple occupation (HMOs) for students. Initiatives aimed at increasing the provision of family housing, such as new build schemes and the use of planning restrictions to prevent the conversion of family homes to HMOs, are being undermined by the growth in STRs. Local community groups have worked together to produce the information for this snapshot. Whereas most of our data so far has come from Inside Airbnb and is aligned to the city's former ward boundaries (pre-2018) this data, gathered in February 2020 relates only to STRs within the current Moss Side ward boundaries.

Data was taken from Airbnb and Booking.com in February 2020 and analysed using information from adverts, reviews and discussion with neighbours and community groups. See Appendix 1 for more on the methodology used.

4.1.2

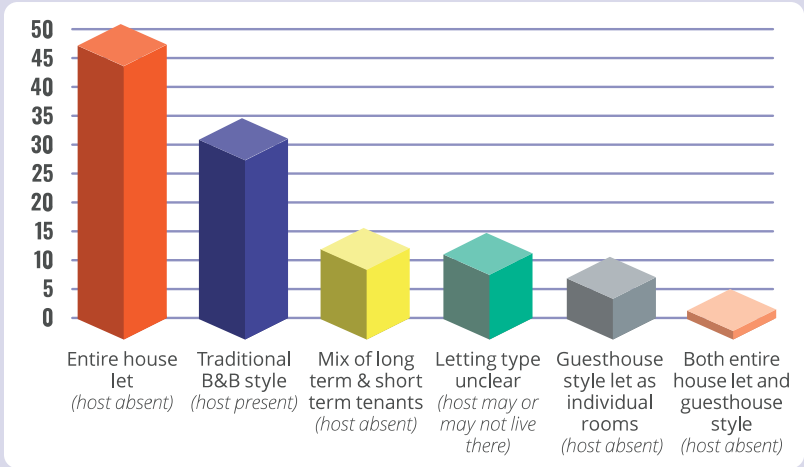
The STR sector in Moss Side – loss of family housing

In February 2020, there were 108 houses being used as STRs in Moss Side, across 167 listings. There are more listings than properties as some houses were advertising several rooms separately within a house.

Figure 5 reveals that of the 108, 46 were entire house lets, and seven offered rooms on an individual basis. The remainder were either traditional B&B style lettings with

Figure 5

Type of short term let houses, Moss Side, February 2020



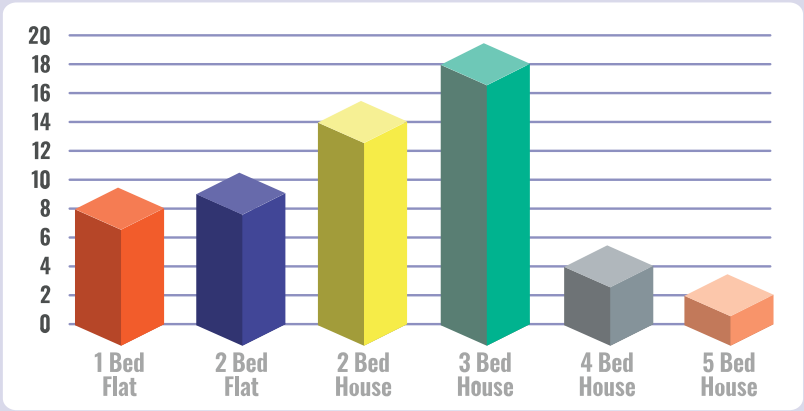
the host present (31 properties), a mix of short term and longer-term tenants (11), or the arrangements were unclear (11). One house was let both to large groups in its entirety, and at different times as individual rooms. There is some fluidity in STR arrangements, especially when hosts are absent, which makes monitoring difficult and time-consuming.

Figure 5 also shows that the great majority of STRs are not rooms let by ‘hosts’ in their own homes, as Airbnb often suggests, but are commercial ventures by landlords. Of the 108 houses listed, only 29-39% are used in the traditional B&B style with the host in residence and welcoming visitors to their home.

Between 55 and 66 houses of varied type and size appear to have been lost from permanent residential use (Figure 6). These were one to two-bed flats, and two- to five-bedroom houses. Sixty-nine per cent were houses. Five (9%) had been built within the past four years, with two having been built as part of a recent scheme to improve the supply of family housing.

**Figure 6**

*Type of property no longer available to permanent residents (based on original layout, eg, a house with three bedrooms at the point of sale, is recorded as a 3 bedroom house, but it may have since been extended specifically for the purpose of short term letting.)*



The STRs are distributed widely across Moss Side. However, there is one street where five of the last eight house sales went to a short term let company. Four of them are advertised on Airbnb and booking.com. A fifth is currently undergoing renovation. The concentration of STRs on particular streets can exacerbate difficulties for local residents and propel further property transformation, accelerating the loss of housing.

## Maximising occupancy

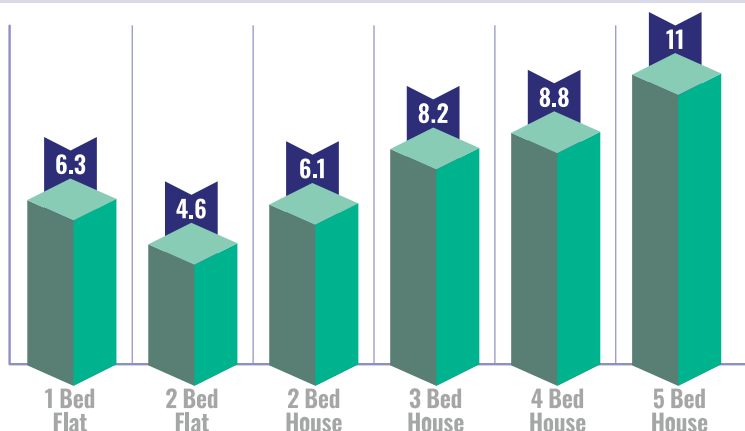
While the most common STR housing in Moss Side consists of former three-bed homes, this obscures an important trend of STR landlords expanding space through extensions, conversions and other internal transformations. Four of the three-bedroom houses identified by residents had undergone attic or dormer conversions to create up to three additional bedrooms immediately prior to becoming STRs.

Whether via remodelling or rearrangement (turning living spaces into bedrooms), STR occupancy levels typically exceed what you would expect for the type of housing used (Figure 7). Hosts owning houses of every size and type of residence, from formerly one bedroom flats to five-bedroom large family houses, manage to massively expand the number of people staying in their STR properties. In Moss Side, three bedroom houses, the most common STR, averaged a maximum occupancy of eight tenants. Four advertised for fourteen guests having been extended. The most under one roof was nineteen in a four-bedroom new build.

**Figure**

**7**

*Average maximum occupancy per house type, Moss Side, February 2020*



Increasing guest capacity is a way for landlords to increase yields over and above the gains they make from 'flipping' a long-term residential property into an STR. The additional strain on neighbours can be immense, especially when it comes to houses being used for parties.

## Party houses and anti-social behaviour

Groups coming together for parties and weekend getaways often bring additional noise and disturbance to a neighbourhood. Short-term, large-group lets also attract events and occasions such as stag weekends. The house goes from being a home in a residential street to a leisure destination location, making the interests of neighbours and guests often sharply divergent. There are multiple references to pre-wedding parties and celebrations in the Airbnb reviews of one mid-terrace STR in Moss Side.

## Evidence of impact from residents *(\*some names have been changed).*

### Moss Side Resident A

Pete, 60+, has lived in the same Moss Side terrace since childhood. Over the past two decades, he has watched the street transform, first with student shared houses, and now with Airbnb-style lets. "It's had an immense impact on the area," he says, "It totally means we've lost community."

**“ I dont want  
to be on  
tenterhooks  
all the time... ”**

Around 40% of the homes on the street are student lets, while the fifth large STR will soon open next door. Although Pete would like to live out the rest of his life in his home, he is having second thoughts. "I don't want to be on tenterhooks all the time, thinking 'Am I going to have hen parties or a stag do next door?'" With four other short term rental houses already on his street, he knows how disruptive living near one can be. Although he's a deep sleeper, his partner has been woken up by the noise from a party house four doors down.

Part of what concerns Pete the most is the lack of accountability of commercial STR landlords. "This Airbnb next door, I don't know who owns it. So who do I address problems to?" he asks. "Normally if there is a nuisance problem you can hold someone accountable and there can be some kind of a grievance procedure." To the other side is a student house, and he has a direct line to the landlord if there are any problems. "With Airbnb there's nothing," he says.

Pete is saddened, perceiving that the council has allowed his street to be turned into a party street, saying "You can just buy a house, pour another £50k into it, and turn it into an unlicensed hotel, which is basically what they

are.” He also has safety concerns, asking “Are the Airbnbs complying with fire regulations? Who knows? Because there’s no accountability. They certainly didn’t even bother with a party wall agreement when they did loads of structural work next door, so what other shortcuts are they taking?”

He says he can’t be angry at the people renting the homes, or with the owners who are acting within the law. However, he’s perturbed that “it seems to have the council’s blessing”.

“We hear at election times how important it is to preserve family homes in the Moss Side area,” Pete says, “but what is actually being done about it?”

What would Pete like to see from the council? “I would just like the Airbnb situation to be treated seriously,” he says, “and for them to stop any further Airbnbs, because I think we’ve got enough now.”

## Moss Side Resident B

Raana lives in a terraced house in Moss Side with her husband and three children under five. The youngest is severely hearing impaired.

When the house next door became a short-term let, they thought they would get used to it. But after nearly two years, Raana is getting desperate. “It’s like a nightclub next door,” she says.

“First it’s the excess noise that bothers you,” she explains, “then it’s the language being used, then it’s the music, then it’s bringing dozens of strangers back to the house, the amount of alcohol, the helium balloons [nitrous oxide canisters], and the smell of cannabis coming into your home.”

She realised just how loud it had become when her deaf child was woken by the vibrations coming through the wall.

“It’s all the aftermath of it too. They wake up hungover, they have all the windows open, trying to freshen up the place, with the music on.” The effects can be seen for weeks by the litter left on the streets.

Raana doesn’t know who owns the property and has never met them. She also says, “I don’t think any group of people who have been there have stuck to any rules if there are any.”

*“ We’ve thought about moving out of the area... There have been times when we felt unsafe. ”*

“We’ve thought about moving out of the area,” she says, adding “There have been times when we have felt unsafe.”

Raana grew up on this street and remembers when it was residential. As a child, she knew all the neighbours and recalls happily playing out in the street. Now she wouldn’t consider leaving her children outside on their own.

“As a kid, I felt safe, I knew who lived at every single door. That’s how warm and welcoming it was,” she says. Then homes started to be let out to students, and now they’re increasingly becoming Airbnb party homes. “We miss the residential element.”

## Moss Side Resident C

Amina has lived in a terraced house with her family on a quiet residential street in Moss Side for nearly three decades since migrating from Somalia.

18 months ago, the three-bedroom house next door was converted into a 14-bed Airbnb, renovated to trendy stripped-back brickwork and wooden floorboards, all of which exacerbate sound disturbances significantly. Visitors often include large hen and stag parties, which have greatly impacted Amina’s quality of life.

“Since Airbnb has been here it has been a great nuisance and disturbance to the street. The sole purpose of renting out Airbnb’s are usually for a weekend getaway, so it does not make sense to put it at the heart of a residential street.”

Amina doesn’t speak English fluently, and is not aware of any way to report the problems she has encountered. She hasn’t raised the issue with the Council despite it significantly impacting on her and her family’s quality of life and ability to get decent sleep at the weekends.

**“ I have heard unnecessary screaming, loud music and slamming doors. ”**



## 4.2

## Northern Quarter Case Study

## 4.2.1

## The STR sector in the Northern Quarter

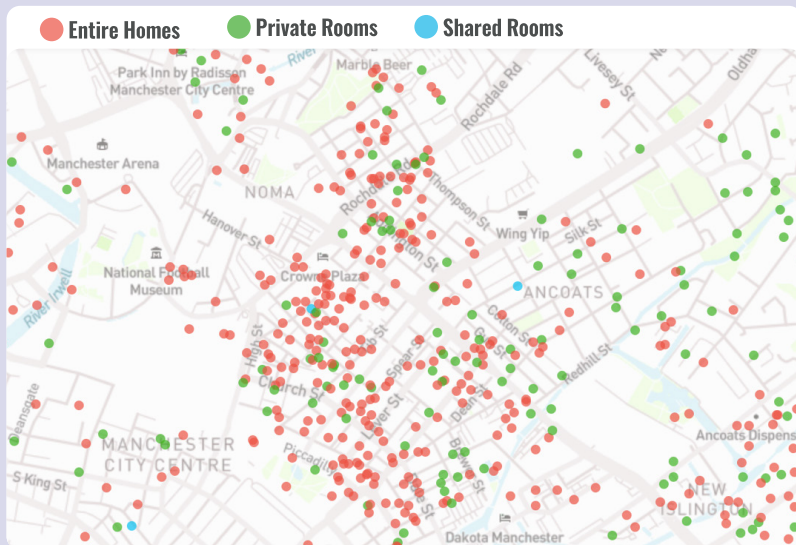
Airbnb is traditionally understood as a city centre problem, so we wanted to focus on Moss Side first to make clear its impact on ordinary neighbourhoods outside of this area, problems which recur in neighbourhoods as diverse as Hulme, Withington and Levenshulme. However, there are issues particular to the central ring, where many of the STRs are concentrated, that we now explore through a case study of the Northern Quarter.

The Northern Quarter is a centrally located neighbourhood known for its cultural offering, night life and independent businesses. Over the last 20 years, with its proliferating bars and restaurants, it has become a popular destination. It has experienced a growth in hotels operating in and around the area, and more recently the rapid emergence of short-term rental apartment blocks and Airbnb properties.

InsideAirbnb data considers the Northern Quarter part of the wider city centre which in November 2021 had 280 Airbnb listings, 77.5% of them entire homes. The map (Figure 8) shows that many of these properties are within the boundaries of the Northern Quarter.

**Figure 8**

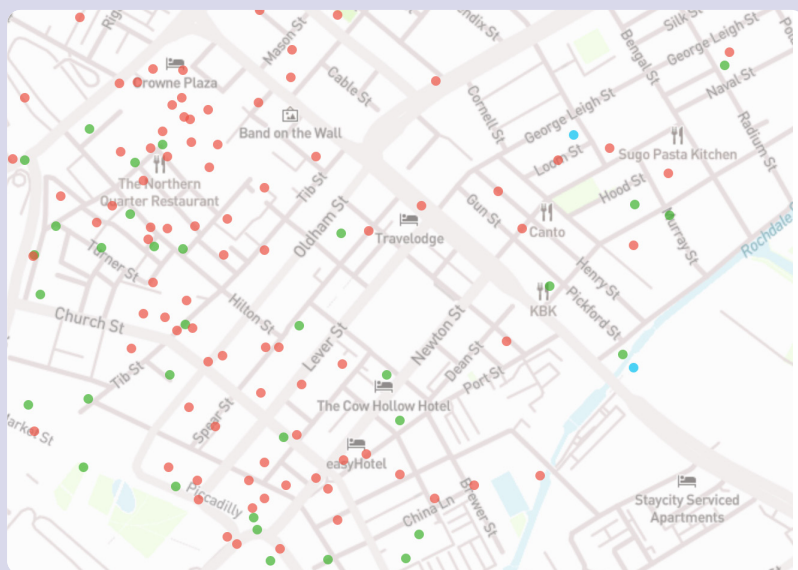
*Airbnb listings in and around the Northern Quarter*  
(Source: InsideAirbnb)



The average STR rental price per night is £131, providing an average estimated £1,300+ income for the landlord per month, more than could be generated from a long-term tenant and with potential to increase significantly if occupancy levels return to pre-pandemic levels. A 2016 AirDNA survey showed a total of 310 units being advertised on Airbnb within central Manchester, a 70% increase on the previous year. The average price per night for an entire property in 2016 was £143; the highest £1,251. Over 47% of city centre listings are owned by hosts with more than one rental property - a professionalised operation unencumbered by taxation to help mitigate its worst effects. While occupancy rates have been low during the pandemic months, it is highly likely that in the post-Covid era the STR sector will rebound and become one of the most pressing challenges in the Northern Quarter.

## Figure 9

*Airbnb properties in the Northern Quarter  
(Source: InsideAirbnb)*



In April 2021, we found 115 active rentals in the Northern Quarter (Figure 9), 75 of them incorporating a full property (65%). This is in addition to over 500 serviced apartments operating in the area.<sup>26</sup> With the residential population of the wider Piccadilly ward estimated to be just 7,000, it is hardly surprising that the character of the neighbourhood is changing rapidly, while fears grow that it is 'losing its soul'.

Short term rental properties in the Northern Quarter are known as 'party flats' by residents. Loud and sometimes anti-social behaviour occurring late into the

night, alongside issues of increased litter and waste (especially the ubiquitous empty nitrous oxide canisters). These problems have been regularly highlighted and documented by the Northern Quarter Forum, and have made the area a difficult place to live for long-term residents. A Northern Quarter Forum member told the Manchester Evening News in 2019:

“They are not being run as a business, they’re not paying business rates, they’re not using commercial waste facilities, they’re not considering health and safety issues... it’s a minefield.” The leader of the council’s STR task group, Pat Karney, is quoted in the same article as saying “We’re concerned about it, particularly in the Northern Quarter”.<sup>27</sup>

In August 2020, Greater Manchester Police took action on a property on Tib Street, using a court order to stop what were referred to as ‘Covid parties’ taking place in three flats. Dozens of guests played loud music until 4am.<sup>28</sup> A three-month closure notice was served on the owners, Hornsearle Property Ltd. This is among the very few examples of local enforcement that we know of, and it is not clear whether the same power could be used outside the Covid laws that were in place during the episode.

## 4.2.2

### Evidence of impact from residents

#### Northern Quarter Resident A

Thomas is a permanent resident in an apartment block on Lever street in the Northern Quarter. Although the building is designated for residential use only - as stated in contracts - several apartments are let out on Airbnb and Booking.com.

“At the entrance to the building there are messages stating that Airbnb is NOT allowed here. Unfortunately, certain people are ignoring this and it is threatening permanent residents’ security and damaging our property.”

Thomas lives directly below a short-term rental, while another is nearby on the floor below, which he can see from his flat. Despite being nearly deaf and not wearing his hearing aids at night to sleep, he says: “I’ve been woken up at stupid hours in the night due to loud music and thumping like elephants.”

These apartments continued to be let out during the pandemic, with people bringing back groups after the 10pm curfew to continue drinking and partying. There has been damage to the building including to the locks leaving

**“ This residential only building is being treated like a hotel. WE ARE NOT A HOTEL! ”**

Thomas feeling unsafe in his own home with strangers entering the building at all hours.

Some of the things Thomas says he has to deal with on a regular basis:

- *Airbnb guests banging violently on my door during early hours of the morning because they are heavily intoxicated and come back to the wrong apartment.*
- *Shouting in the corridors*
- *Leaving rubbish in the corridors, stairwells and foyer*
- *Standing at the building entrance in groups smoking with the door open and letting anybody walk in.*
- *Leaving the main door open or not making sure that it has closed and locked properly behind them.*
- *Letting everyone and anyone into the building, including homeless and thugs who then hang around the car park, sleeping rough, causing serious damage to people's cars, drug dealing and leaving human waste i.e. urine and human faeces.*



## Northern Quarter Resident B

Rachel moved with her husband to the Northern Quarter six years ago. Three nearby flats that previously had long-term tenants are now rented out short-term on Airbnb and other platforms.

Around three times a month she and her husband are disturbed by loud parties, with guests bringing back large groups to the flats. On multiple occasions they have been kept up all night due to the disturbance, they've been verbally abused by guests at the flats, and rubbish and litter from parties have been strewn across the street.

Rachel says the flats have a "notorious reputation" in the area, having been occupied by "a supposed celebrity Tattooist" and as well being used by sex workers as a temporary base.

Rachel recalls one gathering lasting until 6am. After being called to the property on one occasion, police informed them that 30 people had been present.

On another occasion when police were called out, she heard a guest threatening to track down whoever had reported the party. "I heard a very angry man expressing a desire to find the 'grass' who had ended the party, saying something like 'it cost me a fortune to hire the decks'".

Another time a group of six in their late teens loitered outside Rachel's home after checking out. They were intoxicated and rowdy and threw rubbish on the ground. When asked by Rachel's husband to respect the local lockdown and leave, "they became verbally abusive".

As well as calling the police, Rachel has sometimes tried contacting the Council's Out of Hours Team and the Anti-Social Behaviour Team, who have sometimes intervened. When the problem started, Rachel and her husband also attempted to deal with the issue by going directly to the owner who met with them. But although the owner reassured them the problems would be resolved, they weren't.

The owner now no longer answers the phone or responds to text messages when they try to contact him. The management company of the flats has employed security for the buildings, also without results.

**The situation has been ongoing for two years.**

*“ I have even seen amplifiers and PAs set up in the property along with numerous people inside, both prior to and during [lockdown]. ”*

## 5

## Addressing the problem

The problem of the commercial short term rental sector in Manchester is significant and complex, and its continued growth is a worrying prospect in terms of further loss of housing to long-term residents, and further strain on neighbourhoods and cost to local services. It means that all possibilities for improving the situation must be considered.

### 5.1

### What have other countries done to preserve housing for residents?

Table 2 summarises the interventions that six other European cities have taken with the specific intention of limiting the number of STRs to preserve housing for residents.<sup>29</sup>

Legislating and implementing these measures has proven challenging. Online platforms make it easy to let properties without the authorities knowing where they are or who owns them, and Airbnb and others are often reluctant or slow to remove illicit listings when asked to do so. Monitoring and enforcement is labour intensive and costly to the local authority.

The city of Barcelona, where registration is compulsory, has invested in 30 inspectors, and 40 “visualizers” to examine the adverts and seek out suspected illegal STRs. While this succeeded in cutting the number of STRs by 70%, those operating illegal STRs have become experts in hiding the locations, dressing them up as ordinary homes and asking guests to lie to inspectors.<sup>30</sup> Overall, however, in Barcelona and other cities, making registration compulsory has helped to curb the growth of STRs, benefiting local residents and reducing housing market inflation.<sup>31</sup>

*Table 2. Interventions taken by other European cities against short term lets*

<b>City</b>	<b>Intervention to limit number of STRs</b>
<b>Berlin</b>	Banned without a permit, and very few permits are issued. Occasional use of a primary residence as an entire house let. Second homes can be let for 90 days.
<b>Barcelona</b>	Use “zoning” to ban any more permits for STRs in central tourist areas with small amount of growth in other areas.
<b>Madrid</b>	Ban on STRs in blocks of flats where there isn’t a separate entrance and staircase from that of residents. The rules apply in zones near to tourist areas.
<b>Amsterdam</b>	Banned STRs completely from residential areas of three cities. However, this was overturned in court in May 2021.
<b>Lisbon</b>	In certain neighbourhoods popular with tourists there is an outright ban on any more STRs where STRs make up more than 20% of housing. In neighbourhoods where STRs make up 10-20% of housing, new ones are only allowed under strict conditions.
<b>Paris</b>	STRs are defined as commercial and any host must have authorisation for a change of use from residential. Applicant has to contribute to a scheme that turns non-residential properties to residential. However, many commercial premises are now being turned into STRs as planning permission is not required for this change.



## 5.2

### What powers exist in England to prevent loss of housing to STR use?

Whilst tourist destinations across the world have been able to implement a wide range of measures, and Scotland has just passed a law allowing local authorities to ban STRs in areas of high housing pressure, there is very little legislation in England that can preserve housing for permanent use – with the exception of London’s ‘90 day rule’, discussed below.

The biggest challenge for local authorities in England is the lack of regulatory power. Requests to the government for additional powers have fallen on deaf ears:

*“The government has made it clear that it has no plans to ban the use of residential properties for short-term letting. It considers that further legislation would be overly bureaucratic and could act as a barrier to households letting out their properties on a short-term basis. Instead, the Government prefers a non-regulatory approach by encouraging the Short Term Accommodation Association to improve standards and promote best practice in the industry.”*<sup>32</sup>

The government has urged councils to make use of the enforcement powers that they do have but these are limited and not always suited to the challenges presented by STRs. Some councils have made use of planning enforcement powers, which has brought both success and challenges.

## 5.3

### Use of planning enforcement by local authorities outside of London

Entire house STRs and ordinary residential houses are in the same planning use class (C3), and therefore planning permission is not required to change from one use to another. The exception to this is in London where a house is deemed a change of use if let for more than 90 days per year. There is a clear cut definition of the point at which a London authority can take planning enforcement action against a landlord.

Outside of London, we are aware of 9 English local authorities having permanently shut down 23 host-absent entire-house STRs.<sup>33</sup> They did this by arguing that their nature and use meant that the properties no longer fit the definition of an ordinary residential home (C3) and therefore constituted a material change of use that would require planning permission. Planning enforcement notices were successfully served in every case, ordering them to permanently cease use as short term lets. In 24 cases, the owners appealed against the notices. The Planning Inspectorate dismissed each appeal. (see Appendix 2 for the cases.)

In dismissing the appeals, the planning inspectors had to justify their decisions. As well as referring to harm caused by factors including high turnover of guests, tendency towards party type gatherings, high numbers of simultaneous guests, parking issues and anti-social behaviour, reference was made in several cases to the depletion of housing stock, which contravened local policies.

### **Oxford example: enforcement on grounds of residential housing need**

A two-bedroom terraced house in an area of high student density in Oxford had been advertised as a short term let on Airbnb and booking.com. It offered stays of between one night and one week, was targeted at families and restricted parties to a maximum of four people. Following neighbour complaints of antisocial behaviour and nuisance, the council served an enforcement notice in 2019 ordering the cessation of its use as a short term let.

The host appealed. The planning inspector noted that there were 55 customer reviews from 2018 and 45 reviews from 2019 and concluded that the transient pattern and high turnover of occupants made it untypical of a normal home. Also noted was that the owner had no way of verifying if it was families booking it and that a review showed that a group of 12 had stayed there.

To justify enforcement, the inspector had to identify the harm it was causing. Although reference was made to the potential for disturbance and noted one complainant, the loss of a permanent home in an area where it was policy to protect existing stock was a significant factor in their decision. The inspector stated in Paragraph 25 of the appeal decision:

*"I acknowledge that the development has only resulted in the loss of one dwelling but [...] the policy states that given the scale of objectively assessed housing need in Oxford, it will be important to ensure that the existing stock of homes is protected otherwise the benefits of building new housing would be undermined."*

(Appeal Reference: APP/G3110/C/19/3239740, 45 William St, Oxford)

What is most significant about this recent Oxford case is that the house in question was previously a family home. It mirrors the situation in South Manchester, where family homes are being bought up by short-term let landlords. Now that at least 9 councils have used this method to shut down a small number of problem STRs, and the planning inspectors have supported council action, will more local authorities follow suit to protect communities and restore quality of life to affected neighbourhoods?

In a report to its Economy Scrutiny Committee in February 2020, Manchester City Council stated that it had successfully used planning powers in 2017 to shut down an STR near the Airport.<sup>34</sup> The report does not specify if this was an entire-house let, or a guest house style STR (which is a different planning class from an ordinary house). They also described a case in Cheetham Hill where agreement was reached to cease letting of part of a property without the need for formal action; and a third case that was under investigation. However, the paper describes the process as protracted and resource intensive, stating that outside of London, planning powers are weak and proving unauthorised use is challenging.

At the same Economy Scrutiny meeting it was commented that the Short Term Lettings Task Group wanted *“a steer from Government...akin to Scotland, in order to provide the power necessary in Manchester to address the problems associated with such types of lettings.”*<sup>35</sup> At the time the Scottish government had just announced plans to establish an STR licensing scheme and to give local authorities the ability to introduce short-term let control areas, where there are housing pressures.

In March 2020, a Manchester City Council report on the Private Rented Sector Strategy 2020-2025 stated: “Planning legislation is such that in many cases STRs do not require a planning consent. However, if complaints are received about a possible unauthorised use these will also be investigated.”<sup>36</sup>

This begs the question: are affected residents aware that the Council will investigate, and has anyone told them how to report it? What sort of cases would be considered if the City Council’s stance is that many do not require planning consent? This requires clarification as part of worked-through STR strategy involving affected communities.

## 5.4

### Problems with the planning enforcement route

Whilst the planning enforcement route has brought relief to a few communities in a handful of cases in England, the lack of unique planning classification for STRs means that there is no deterrent for these changes of use from happening in the first place. Each case to restore them to the correct use has to be argued on its own merits, and time and resources spent gathering evidence. Enforcement can take several months to take effect and there is always the chance of an appeal being successful. There has been a sharp rise in STRs over the past four

years, but this has also been a time of cuts to council budgets, resulting in fewer resources to deal with the problems they increasingly cause.

Cambridge City Council has successfully shut down 14 STRs that we are aware of via planning enforcement, but that number is a drop in the ocean compared to the number of entire-house lets in their city. Currently, with lack of resources and lack of clear planning definition of short term lets it would appear that this route can permanently shut down troublemaking STRs, but not be an effective tool for controlling widespread proliferation of STRs and protect housing supply. It would be a far more efficient use of resources to require all changes to short term lets to apply for permission in advance, but this would require a radical change in the government's stance.





## 5.5 New-builds and use-restriction

As discussed earlier, Manchester City Council has sought to prevent new homes on land it owns from being turned into STRs by including restrictive covenants and clauses within the leases and freeholds which will remain in place when the properties are sold on.<sup>37</sup> This is part of a pilot scheme which if successful could set a precedent for other local authorities in protecting new estates from the influx of STRs. This is a positive step but does not offer hope to existing communities.

## 5.6 The '90 day rule'

Short term rentals were banned in London until deregulation in 2015, when it became permissible to short term let a property up to 90 days only. Beyond that, planning permission would be required. There was an inevitable surge in properties becoming short term lets. However the extent of this demonstrated that even with a limitation of 90 days short term letting is financially attractive with an impact on housing supply. It also highlighted the difficulties of enforcing such a limit.

In 2020, the Greater London Authority (GLA) analysed data on STRs (STLs in their report) in London from 2015 (the year of deregulation) to 2019.<sup>38</sup> It found that:

-  The total number of STRs increased four-fold across London, from 18,440 to 80,770
-  The number of entire-house STRs increased most in Outer London, going up 15-fold
-  Entire-home STRs made up 1.2% of the city's dwelling stock
-  This is highly concentrated in some areas: entire-home STRs accounted for more than 1 in 20 houses/apartments in Westminster

The acceleration away from ‘sharing economy’ spare room lets to commercial STR is confirmed in the capital too. In 2020, of approximately 108,000 listings on the six most popular STR platforms, more than 73,000 were for entire homes.<sup>39</sup>

There is also evidence that the 90-day rule is proving difficult to enforce. There is an online cottage industry of websites and YouTube videos advising how to “get round the 90-day rule” by, for example, changing the photos in the adverts, creating new hosts for the same listing, taking untraceable cash payments, and using a variety of online platforms. According to the GLA report, within two years of deregulation, Westminster City Council alone was investigating 1500 properties suspected of having gone over the 90-night limit with a special team of officers dedicated to the task. London Councils (2020) state that Airbnb provided data to the London Borough of Hackney, showing how fewer than 3% of properties were breaching the 90-day rule (although Airbnb did not share the details of these properties with the authority). However, in 2019, the London Borough of Camden conducted its own research and estimated that of 7000 short term rentals, 48% were violating the rule.<sup>40</sup>

Extensive evidence from London, and from cities across the world where a day cap has been brought in suggest that this is a poor way to slow the rate of growth of STRs, still less reduce overall numbers, without also introducing mandatory registration of entire-home STRs; legal obligations on platforms to remove illegal listings; and caps on overall numbers of entire-home STRs. Even where adequately monitored and enforced, the principle of capping the number of days can result in houses sitting empty for more than half of the year rather than being returned to permanent habitation. Capping the number of lettable days, certainly to as high as 90, has been shown to be ineffective and not something that UK councils should be calling for.

## 5.7

### Voluntary charters to protect communities

So far the government has refused to grant local authorities more powers to protect housing stock. Instead, they have advised councils to work with the Short Term Accommodation Association (STAA) and make use of their “Short Term Lettings Charters”.<sup>41</sup>

Indeed, Manchester City Council has been working with the STAA to draw up a “Considerate Short Term Letting Charter which sets out best practice for hosts, emphasising the shared responsibility of them and their guests.”<sup>42</sup> At the time of publishing this report, we are not aware of the proposed charter having been published.

Irrespective of what Manchester’s charter will say when produced and when the closed-door discussions with the STR trade association have concluded, the government has not granted local authorities the power to enforce any of it. It

remains no more than a voluntary code of conduct, directed at the minority of non-commercial STR landlords, which we predict will have no impact on either anti-social behaviour or the bigger underlying problem of the continued loss of housing to professional STR landlords.

We recommend more time is invested in working with communities adversely affected by STRs.

## Who are the STAA?

The UK Short Term Accommodation Association (STAA) is a trade body established in March 2017 by Airbnb, HomeAway, and several third party companies which professionally service and manage short term lets, such as UnderTheDoormat. The STAA's Director General is Shomik Panda, founder and CEO of lobbying firm Inline Policy,<sup>43</sup> who specialise in political affairs and technology regulation of online platforms and digital technology and are credited for London's 2015 Deregulation Act.<sup>44</sup> Its policy lead is Marie Lorimer, an Airbnb Public Policy representative.<sup>45</sup>

Unsurprisingly, given its role in representing the sector and lobbying for favourable regulation, the STAA's interventions have promoted weak initiatives that promote the dissemination of best practice templates to landlords; 'considerate lets' charters that "remind hosts of their responsibilities towards their neighbours", and voluntary accreditation schemes around safety and legality.

## Case Study – London council working with residents

The Royal Borough of Kensington and Chelsea established a 'Short Term Lettings Working Group' in response to residents' concerns about the impact of STLs on their quality of life and the neighbourhood. They met with local residents and businesses and invited all council members to contribute to their report, final recommendations for which were drawn up at a public panel meeting. A main focus of the report is the negative impact of short term lettings on the community, and the need to empower affected residents to report issues and support the council in its efforts to tackle STL problems.<sup>46</sup>

# 6

## Recommendations

Across the world, the friendly concept of 'home sharing' has given way to a problematic new industry. Commercial activity accounts for 94% of STR revenue in Prague, 89% in Barcelona, 87% in Vienna and 85% in Paris,<sup>47</sup> and as we have shown, it makes up the bulk of the offer in Manchester too.

We are calling for Manchester City Council to act to prevent further rapid growth of the destructive commercial sector and restore short-term rental activity to legitimate letting of spare rooms to paying guests.

It is important that the Council involve and consult local residents and stakeholders, and not just the industry-sponsored STAA, in the creation and implementation of an effective strategy.

We have little faith that an unenforceable 'considerate lettings charter', the favoured solution of STR providers and lobbyists, will make a dent in the problems described in this report.

We would also like to see our political leaders, at city and regional level, make a serious effort to convince the Government of the need for new local powers of regulation. Platforms such as Airbnb are changing neighbourhoods and deepening the housing crisis in many UK cities. A new, national approach is needed.

### **We ask that Manchester City Council take the following next steps:**

- ❖ Ringfence adequate resources for enforcement of planning laws and handling noise, rubbish and nuisance complaints.
- ❖ Provide a named main point of contact for residents who are adversely affected by STRs, to provide all necessary support and advocacy. This should include proactively communicating with neighbours when the Council becomes aware that a host-absent entire house let is in operation.
- ❖ Produce a public strategy outlining actions to date, outcomes, aims and a timetable of future action, including details of any research or lobbying the Council has undertaken and what response they have had.

- ❖ Continue to impose and enforce bans on STRs in new residential developments, to reduce further loss of social and affordable housing in particular, wherever they can legally do so.
- ❖ Meet with local residents, community groups and others affected by STR and keep them regularly updated on what is being done to curb nuisance and safeguard their neighbourhoods.
- ❖ Minute and make public all discussions with STAA, Airbnb, or their lobbyists.
- ❖ Set up a database of short term lettings and encourage Manchester residents to feed in local intelligence. Make this information accessible to relevant council departments.
- ❖ Reject calls from Airbnb and others for London-style system limiting short term lets to a certain number of nights per year.
- ❖ Join forces with other councils and devolved regions to push for the regulatory autonomy to be able to monitor, understand and control the expansion of STRs.

Current attempts by cities across the world to regulate and negotiate with Airbnb and its imitators are met with extensive legal obfuscation, refusal to provide useful data and non-co-operation in removing illegal listings.<sup>48</sup> To have any chance of stopping the continued loss of housing to STRs, we call on Manchester's political leaders and their Greater Manchester allies to lobby the government for a regulatory approach that is enforceable and feasible.

**Such an approach should, we suggest, combine four elements:**

1. A mandatory registration system requiring hosts to apply for a permit, license or registration from the local authority for entire-home listings
2. Platform accountability for host compliance, such that platforms can accept advertisements and transactions only from hosts who have registered their STR. Permit numbers must be displayed prominently in advertisements. Where these are not displayed, the enforcing authority will need processes to notify platforms, who must within a set period of time delist the offending operations. This is important to prevent platforms ignoring requests to remove illegal listings.
3. Platform data disclosure: platforms must be monitored to ensure hosts are going through registration and platforms are not listing unregistered adverts. Platforms should be obliged legally to send regular files containing all active listings on their platform including, as a minimum: permit/license/registration number, platform identifier or URL, name or other details of the host, and property address.<sup>49</sup>
4. Bounded control areas: the ability for local authorities to require planning permission for change of use to an STR and delimit and refuse STR permits within 'Short-Term Let Control Areas' - areas where there is pressure on housing supply or other legitimate community concern - where planning permission for conversion has not been obtained.



## Appendix 1: Methodology of Moss side case study

Booking.com and Airbnb were searched to identify all listings in Moss Side in February 2020. Other online platforms were also searched but these did not show any additional properties that were not already on booking.com or Airbnb.

Booking.com also advertises rooms in established hotels. These were omitted from the data.

Local groups helped analyse listings, to identify which row of houses or apartment block they were in, and where possible the address. .

Why an in depth analysis of the listings was necessary

In 2018, Manchester ward boundaries changed, but InsideAirbnb's data on Moss Side is still aligned to the former ward boundaries. It was necessary to analyse the listings according to the new ward boundaries. Local services are planned according to the ward boundaries, and STRs can and do put pressure on local services.

Whilst listings on booking.com usually state the address, those on Airbnb are pinpointed on a map anywhere up to 150 metres from the location. The pin can be in a different ward and can even place rooms within the same house in different wards. It was necessary to analyse each listing in order to link them correctly to the ward.

Our main aim was to reveal the impact of STRs on housing supply. Airbnb categorises its listing as either 'entire residential house', 'private room' or 'shared room'. Counting 'entire residential houses' alone does not provide sufficient information. Many of the 'private rooms', whilst scattered on the maps could be identified as coming from the same houses, and if the host does not live there, then these houses are also unavailable for permanent residential use. Therefore it was necessary to group together private rooms from the same house and establish the presence or absence of a host, to gain a better picture of the impact on the supply of houses for permanent residents.

## Appendix 2: Short Term Rental Planning Enforcement Cases

This is a list of planning cases we are aware of outside of London, where host-absent short term rentals that let to one group at a time, have been ordered to cease short term letting.

**Suffolk Coastal District Council:** St Audry House: 9 bedroom house letting to large groups. Reference: Moore v Secretary of State for Communities and Local Government & Suffolk Coastal DC [2012] EWCA Civ 1202. This is a case law in which it was ruled that whether or not a house used as short term let/holiday accommodation amounts to a material change of use that requires planning permission depends on the particular characteristics for each case. It is this ruling that is referred to by inspectors presiding over most of the following cases.

**Bath & NE Somerset Council:** 3 Greenaway, BA2 4LJ: 7 bed house let to groups of up to 17 people Source: The Planning Inspectorate, Appeal Decision APP/F0114/C/18/3217514 (2019) Accessed in July 2021 via: <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3217514&ColD=0>

**Braintree District Council:** 15 Queen Street, CO9 3EZ, 9 bed house letting to 25 guests. Source: The Planning Inspectorate, Appeal Decision: APP/Z1510/C/18/31950 (2018) Accessed in October 2021 via <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3195085&ColD=0>

**Cambridge City Council:** (house) 17 Richmond Rd, CB4 3PP: 3 bedroom terrace letting to 5 guests Source: The Planning Inspectorate: Appeal Decision: APP/Q0505/C/18/3193261 (2018) Accessed in October (2021) via <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3193261&ColD=0>

**Cambridge City Council:** (flats) Marino House & Roman House CB1 1AL: 13 identical flats letting to small groups. Reports for all 13 are identical and the hyperlink is to the lead case. Source: The Planning Inspectorate: Appeal Decisions: APP/Q0505/C/18/3196460 (2019) APP/Q0505/C/18/3196461, APP/Q0505/C/18/3196464, APP/Q0505/C/18/3196465), APP/Q0505/C/18/3196466, APP/Q0505/C/18/3196473, APP/Q0505/C/18/3196476, APP/Q0505/C/18/3196478, APP/Q0505/C/18/3196479, APP/Q0505/C/18/3196480, APP/Q0505/C/18/3196481, APP/Q0505/C/18/3196483, APP/Q0505/C/18/3196484. Accessed June 2021 via: <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?Caseid=3196460&ColD=0>

**East Lindsey Council:** "The Old Vicarage, LN12, 1PD": Former nursing home letting to large groups. Source: The Planning Inspectorate: Appeal Decision APP/D2510/C/14/2222553 (2016) Accessed in May 2020 via <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=2222553&ColD=0>

**Newark and Sherwood District Council:** Two 4 bed houses on cul de sac letting to groups of up to 10:

1 Home Farm Close, NG23 5QB: Source: The Planning Inspectorate: Appeal Decision: APP/B3030/C/19/3223682 (2019) Accessed in June 2021 via [https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3223682&CoID=0\(1](https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3223682&CoID=0(1)

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**Oxford City Council:** 45 William Street, OX3 0ES: small mid-terrace letting to groups of up to 4. Source: The Planning Inspectorate: Appeal Decision: APP/G3110/C/19/3239862 (2019) Accessed in July 2021 via <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3239862&CoID=0>

**Sefton District Council:** The Windmill, L23 2SH: Windmill letting to groups of 12. Source: The Planning Inspectorate: Appeal Decision: APP/M4320/C/17/3166632 (2017) Accessed in July 2021 via <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?Caseid=3166632&CoID=0>

**Sunderland City Council:** Wellbank Rd, NE37 1NW: 4 bed house with a hot tub letting to 8 guests Source: The Planning Inspectorate: Appeal Decision: APP/J4525/C/18/3196185 (2018) Accessed in June 2021, via: <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3196185&CoID=0>

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