

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 1:17 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** recorded in DPIE subs register, Potential Duplicate

Submitted on Wed, 11/09/2019 - 13:17

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Ian

**Last name**

McCleary

**Name withheld**

No

## Info

**Email**

[lkbjpb@bigpond.com](mailto:lkbjpb@bigpond.com)

**Suburb/Town & Postcode**

2067

**Submission**

I suggest that consideration be given to amending S137A of the Strata Schemes Management Act as follows:

A by-law made by a special resolution of the owners corporation may prohibit a lot being used for the purpose of a hosted short term rental accommodation arrangement if the lot is not the principal place of residence of the person who pursuant to the arrangement, is giving another person the right to occupy the lot.

A by-law has no force or effect to the extent to which it purports to prevent a lot being used for the purpose of a hosted short term rental arrangement if the lot is the principal place of residence of the person who, pursuant to the arrangement, is giving another person the right to occupy the lot.

In this section, short term rental arrangement has the same meaning as in S54A of the Fair Trading Act 1987.

“Hosted short term rental accommodation” means the person giving another person the right to occupy the lot must reside at the lot at all times, apart from absences for bona fide holidays, illness and emergencies.

The proposal will it is submitted enable good management and enforcement of by laws of Strata Properties.”

Ian McCleary

**I agree to the above statement**

Yes



**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 5:30 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

Submitted on Wed, 11/09/2019 - 17:29

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Ian

**Last name**

Cohen

**Name withheld**

No

## Info

**Email**

[ian.cohen.green@gmail.com](mailto:ian.cohen.green@gmail.com)

**Suburb/Town & Postcode**

Broken head 2481

**Submission**

Support limited days in Byron shire

Owners should be onsite or proper management

Needs to be effective methods ensuring proper tax payment

Support a daily levy on all holiday let's to go directly to Council

Strict fines for agents and owners for lack of noise management  
An effective hotline to be established with powers to fine  
Holiday let is a priveledge not a right and must be effectively policed  
Limit and stipulate numbers of guests at any time

**I agree to the above statement**

Yes

## A response to the discussion paper on Short Term Rental Accommodation Proposed Regulatory Framework

The NSW Government has proposed a regulatory Framework for the Short Term Rental Accommodation Industry. The Industry appears to be flourishing with hundreds if not thousands of properties being made available for short term lets through various on line platforms.

Many people are taking advantage of this situation and are happy to use the services on line platforms and take advantage of the value for money offerings available.

My wife and I have a property which is used occasionally by members of our family for short breaks by the coast and therefore it is an easy extension of that use to allow others to use it from time to time. The property is a unit in a residential block with no current Strata rules affecting our preferred use. We have chosen to restrict the time available for short term lets to within the proposed timeframes suggested in the regulatory framework. We have set rules which restrict who and how people use our property and to a very large degree these rules are understood and followed by our guests. We understand that our chosen use of the property may affect the other people living in the block and we have been diligent in our preparations to accept guests and make the impact as minimal as possible.

I would make the following points with regard to the proposed regulatory framework:

- 1) I do not believe that any further regulation is necessary. People are protected through current laws that seek to control unsocial behaviour including noise, rubbish disposal, nuisance, domestic animals and a host of other issues that might interfere with the natural enjoyment of someone's own property.
- 2) In my specific case if the regulations were imposed as described currently it is likely that I would not continue to provide short term accommodation. The alternative use would be to rent out the property on a long term basis which effectively means I would not be able to use it for my own families enjoyment. Any issues with a misuse of the property or anti-social behaviour would be dealt with under the current laws and Strata rules however, I would also suggest that if there were any issues with the longer term tenants then my neighbours would be left with that issue for potentially a much longer time.
- 3) With regards to the proposed registration, I believe that this would impose additional cost to the industry which would inevitably be passed onto the users of short-term accommodation. Registration suggests that personal information would be collected and that would require proper management and privacy measures to be put in place. How would one online platforms share information with another in a commercially sensitive environment? Currently if a host provides a poor product, they will receive a poor review which will affect their ability to attract users. If a guest acts in an inappropriate manner they will receive a poor review which will limit their ability to use the service. All this information is publicly available through the hosting web sites. The nature of the information that is proposed to be collected over and above that which is publicly available is confidential in nature and it is likely that the only party who would have the ability and neutrality to administer the proposed register is likely to be the state or local government. I have serious doubts that this could be administered in a cost-effective manner, producing more "red tape" and inefficiency into an environment and an industry which is effective and working well.

- 4) With respect to the proposed additional safety measures suggested I would point out that most strata organisations have requirements under planning laws to maintain sufficient safety measures within the buildings they manage. If a single unit requires additional alarms or lights this would be an impractical imposition onto the strata body and also for the individual owners within that block. The accommodation being used is not a hotel or a commercial building which has been designed for that purpose. It is a home that is as safe as the law and its owner deems necessary. If the guest does not feel safe, they have rights to leave and to gain compensation for any loss. I would suggest that Insurance (property, contents, public liability) should be made mandatory requirements with evidence of compliance required to be posted on the hosting sites.

What is the difference between a homeowner occupying their premises and guests who may be introduced through an online hosting site or privately arranged as a house sitter or a long-term tenant? Each situation requires the occupier to acquaint themselves with their situation and plan for their own safety commensurate with the risk they perceive.

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Thursday, 12 September 2019 5:24 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Tessa Submissions, non Air BNB run

Submitted on Thu, 12/09/2019 - 05:21

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Ian

**Last name**

Connolly

**Name withheld**

No

## Info

**Email**

[iscon2006@yahoo.com.au](mailto:iscon2006@yahoo.com.au)

**Suburb/Town & Postcode**

2120

**Submission file**

[short-term-accomm..docx](#)

**Submission**

I have attached a short document which addresses my concerns with the proposed regulatory framework as best as I can. I ask that you consider my submission.

**I agree to the above statement**

Yes

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 4:10 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Rob submission 3.0, non Air BNB run

Submitted on Wed, 11/09/2019 - 16:10

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Ian

**Last name**

Curdie

**Name withheld**

No

## Info

**Email**

[icurdie@bigpond.com](mailto:icurdie@bigpond.com)

**Suburb/Town & Postcode**

Lavender Bay

**Submission**

My submission is a simple one. The proprietors of a strata plan, (a strata community), must be able to say how they want their strata plan to run. Democratic decisions taken by the proprietors must be

allowed to stand and should these decisions be flouted by individual owners, then the decisions of the strata plan must have enforceable remedies at law. It is not the place of the government to force short term tenancies on any unwilling strata community.

thank you, Ian Curdie.

**I agree to the above statement**

Yes



**From:** Ian Foster <ian@lantern.com.au>  
**Sent:** Tuesday, 10 September 2019 3:31 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** recorded and not sent to DCS, recorded in DPIE subs register, Purple category

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

I have a business that represents home-owners who wish to host on Airbnb. Airbnb helps these home-owners to pay the mortgage and the bills, and to share their spaces to guests so that they can become part of other communities.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share the homes of our home-owners.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired

- Require evacuation or emergency plans and guest education

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Ian Foster  
2 Banjo Dr  
Kosciuszko National Park, Nsw 2625

**From:** no-reply@planning.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Wednesday, 28 August 2019 4:29 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category

Submitted on Wed, 28/08/2019 - 16:29

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Ian

**Last name**

Greenwood

**Name withheld**

No

## Info

**Email**

[BORMIO@GRAPEVINE.COM.AU](mailto:BORMIO@GRAPEVINE.COM.AU)

**Suburb/Town & Postcode**

Tomakin, 2537

**Submission**

We have a house in Tomakin that we make available for holiday rentals during certain times of the year.

The property is a 3 bedroom detached, single level 'family' home.

We have the '3rd' bedroom setup for children with 2 single bunk beds - the other 2 bedrooms both have a single queen size bed. I believe this may contravene the new rules on number of beds per room yet I don't believe that what we have is particularly cramped or unsafe. Could exemptions be made available?

The fire alarm rules also seem a bit excessive - perhaps alarms in each bedroom but a linked system with hallway lights seems a bit excessive in a single dwelling.

**I agree to the above statement**

Yes

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Tuesday, 10 September 2019 3:10 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Dom submission, recorded in DPIE subs register, Purple category

Submitted on Tue, 10/09/2019 - 15:09

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Ian

**Last name**

MacDonald

**Name withheld**

No

## Info

**Email**

[ian.leadership@gmail.com](mailto:ian.leadership@gmail.com)

**Suburb/Town & Postcode**

Newport 2106

**Submission**

As an owner of an apartment, I believe that stratas should have some capacity to have a by-law (which requires 75% support) to limit or eliminate short term lending. I recognise some stratas will support it

but there are others where owners' rights are compromised and where short term renting can result in increased maintenance / repair costs and intrusion into lifestyle.

It is also an imperative that any registration system not be in the hands of the short term letting industry but is managed by government or local government. Allowing the industry to manage such a process leads to a very obvious conflict of interests.

Where short term letting is allowed, it does require a strict code of conduct that protects owners and long term residents.

**I agree to the above statement**

Yes

**From:** Ian Madden <madden.ianf@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:22 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Ian Madden  
12 Livingstone Pl  
Mount Colah, Nsw 2079



**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 12:32 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

Submitted on Wed, 11/09/2019 - 12:32

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Ian

**Last name**

McCleary

**Name withheld**

No

## Info

**Email**

[ian.mccleary@iinet.net.au](mailto:ian.mccleary@iinet.net.au)

**Suburb/Town & Postcode**

Chatswood 2067

**Submission**

I suggest that consideration be given to amending S137A of the Strata Schemes Management Act as follows:

(1) A by-law made by a special resolution of an owners corporation may prohibit a lot being used for the purpose of a hosted short term rental accommodation arrangement if the lot is not the principal place

of residence of residence of the person who, pursuant to the arrangement, is giving another person the right to occupy the lot.

(2)A by-law has no force or effect to the extent to which it purports prevent a lot being used for the purpose of a hosted short term rental accommodation arrangement if the lot is the principal place of residence of the person who, pursuant to the arrangement, is giving another person the right to occupy the lot.

(3) In this section, short term rental arrangement has the same meaning as in section 54A of the Fair Trading Act 1987.

(4)"Hosted short term rental accommodation" means the person giving another person the right to occupy the the lot must reside at the lot at all times, apart from absences for bona fide holidays, illness and emergencies.

The proposal will better enable good management and enforcement of by laws of strata title properties and I request that consideration be given to the submission.

**I agree to the above statement**

Yes

**From:** Ian Slater <ian.slater@asia.com>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** [SUSPICIOUS MESSAGE] Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** rob submission 2.0, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired

- Require evacuation or emergency plans and guest education

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Ian Slater  
18 Jessie St  
Westmead, Nsw 2145

**From:** Ian Treleaven <iantreleaven@me.com>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

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Thank you for reading my submission.

Regards,  
Ian Treleaven  
78 New Beach Rd  
Darling Point, Nsw 2027

**From:** Ian Zhang <amon0102@hotmail.com>  
**Sent:** Tuesday, 10 September 2019 8:04 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** recorded in DPIE subs register, recorded and not sent to DCS

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

#### STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

#### Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
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#### STRA Property Register

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#### Code of Conduct

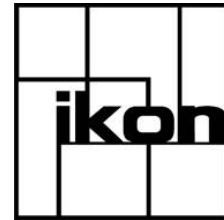
I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Ian Zhang  
U 2, 125 Euston Road, Alexandria, NSW 2015  
Alexandria, Nsw 2015





The Ikon  
81 Macelay Street  
Potts Point. 2011  
10<sup>th</sup> September 2019

The Hon. Rob Stokes  
Minister for Planning and Public Spaces

**NSW GOVERNMENT'S PROPOSAL FOR STRA IN NSW RESIDENTIAL STRATA SCHEMES.**

Dear Minister,

I write in my capacity as Chair of the *Ikon* strata committee and endorse the submissions made by Mr. Ralf Harding, Chair of *The Altair*, dated 9<sup>th</sup> September.

The *Ikon* is a large strata scheme located in Potts Point, with over 180 lots. The *Ikon* offers residents a secure, luxurious and community-minded home complemented by leisure facilities, a pro-active and hands-on strata committee and professional on-site concierge and building manager, who assist residents day to day and ensure adherence to our by-laws. It is for these reasons that people choose to buy and reside in our building – and indeed, pay a premium for this lifestyle. This high standard of living that we currently enjoy however, stands to be substantially eroded should the proposals for STRA be adopted.

We make the following observations in relation to the proposal currently on exhibition:

**Exempt and Complying Development:**

*Ikon*'s owners have consistently voted overwhelmingly to restrict the use of apartments for short term (defined as less than 3 months) tourist or holiday accommodation and moreover, leasing of apartments in *Ikon* for less than 3 months is an unapproved development activity according to our development consent.

The proposal to make dwellings exempt within day limits, is effectively changing the goal-posts on owners who have decided to make *Ikon* their 'home' and under the proposed day limits, would now be subjected to living in a quasi-hotel with strangers staying next door or across the corridor every other weekend.

We believe that 1) residential schemes should have their existing development consent conditions upheld, 2) un-hosted short-term lets should be capped at a more reasonable number of days and 3) no exemption to the un-hosted day threshold for guests staying longer than 21 days. The hypothesis that a 3-week stay is likely to impinge on our amenity less than a 3-night stay is not an experiment we want tested in our homes.

Under the threshold of 180 days for un-hosted units, apartments could be leased short term every weekend of the year and this places an unacceptable imposition on residents and burden on the building's common facilities/property.

### **Code of Conduct:**

Whilst a code of conduct is in theory a good idea, in practice it is a toothless tiger and places further pressure and demands on the unpaid volunteers who serve on the strata committee and are answerable to their fellow owners, should there be problem guests or hosts who contravene the by-laws and/or the code of conduct.

To give a practical example, whilst we have security cameras across large tracts of the common property, they can't cover all areas. How are strata schemes supposed to sufficiently evidence damage to the common property to satisfy the Commissioner?

With respect, recording a 'strike' against a guest or host, offers little comfort to an owners corporation dealing with 180 lots, who are left paying for the repair of common property should it be misused or damaged by short-staying guests who have no long term interest in the property.

A further deficiency of the code of conduct is in relation to the Commissioner only accepting a complaint for a contravention of by-laws, if NCAT has firstly made orders for a financial penalty for the contravention of the by-law. This then imposes an obligation on the strata committee to take action through NCAT – a time consuming process with uncertain results and no enforceability for the financial penalty, short of pursuing further legal avenues.

### **Industry-Led Register:**

The proposed register is necessary to ensure compliance with any STRA rules, however leaving the administration of this register under the purview of the Short Term Letting industry is akin to letting the fox guard the hen house. We believe that an independent body such as Local Council would be more suited to monitor and police the register.

Separately, an exclusion register may not necessarily capture all short term letting participants who negatively impact the amenity of residents, for reasons outlined above.

We submit that 1) hosts should be required to register their premises with the strata committee and strata manager of their building complex before any commercial letting takes place, just as traditional leasing arrangements for 3 months or more are compelled to do, and 2) the owners corporation, via their strata manager, are able to request a bond of say, \$5000 before any short term letting is permitted and/or charge fees or extra levies on owners of lots who short term let.

### **Fire Safety Certification:**

Strata Schemes have stringent fire safety standards that they are required to maintain and have certified annually. There are penalties for buildings that fail to satisfy their fire safety standards and any building that contains apartments used for short term lets will have to upgrade to a higher commercial standard. In *Ikon's* case, that would mean fire extinguishers and blankets in the kitchens and evacuation diagrams on the rear of doors. Who is responsible for ensuring that these extra fire

safety measures are in place? It is ultimately the owner's corporation who bears all the risk without any ability to enforce the regulations.

With respect, policy makers – some of whom may not appreciate the reality of living in a strata scheme – need to understand that Strata Plans are fundamentally different to private stand-alone properties. When you make a decision to live in a residential strata scheme, whilst you may do as you wish within the confines of your 4 walls (within reason), the rest of the property is communal and a shared cost to maintain and repair. It is the ultimate democracy, with every owner getting to vote on matters pertaining to common property and by-laws or 'rules' are enforceable if need be. For the most part, the long-term outlook of residents who live within the strata scheme compels individuals to self-regulate their behaviour, which makes for a harmonious living environment. However, should the government implement the proposed changes, it would upset this fine balance that we have achieved, by turning our building – *our home* – into a de facto hotel.

We submit that strata plans like ours should be left to decide how to manage our schemes – which we have done successfully for many years – without the long arm of the state government changing the law midstream to appease a billion dollar US company who pays little or no local taxes.

Yours truly,

Alexandra King  
Chair, Ikon Strata Committee

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Tuesday, 10 September 2019 8:19 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** recorded in DPIE subs register

Submitted on Tue, 10/09/2019 - 20:17

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

**First name**

Alexandra

**Last name**

King

**Name withheld**

No

## Info

**Email**

[alex@philippeperzi.com](mailto:alex@philippeperzi.com)

**Suburb/Town & Postcode**

Potts Point

**Submission file**

[short-term-rental-accomm\\_september-2019.pdf](#)

**Submission**

Please find attached submissions on the STRA proposal on exhibition, made on behalf of the Ikon Building (Potts Point) Strata Committee

**I agree to the above statement**

Yes

**From:** Ilya Shirsho <ilya.shirshov@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:16 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Ilya Shirsho  
1 Brodie Spark Dr  
Wolli Creek, Nsw 2205

**From:** Ineke Van Overmeir <inekevano@yahoo.com.au>  
**Sent:** Wednesday, 11 September 2019 2:22 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Rob submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it enables myself and my husband to continue supporting ourselves financially. It also enables us to be able to keep living in our home for as long as possible while our health permits.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

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Environmental Planning and Assessment (STRA) Regulation 2019

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- Mandate smoke alarms – either battery operated or hard-wired



- Require evacuation or emergency plans and guest education

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#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Ineke Van Overmeir  
27 Greyleigh Dr  
Kiama, Nsw 2533

**From:** Ingrid Kwong <ingrid\_kwong@bigpond.com>  
**Sent:** Wednesday, 11 September 2019 2:23 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Rob submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host an Airbnb in Mackerel Beach (your electorate). We bought the tiny shack in 2013 (after it sat on the market for 2.5 years). Although it was not heritage listed it was considered a local piece of history and a landmark by locals. However, due to its poor condition (asbestos clad exterior and termite ridden interior) and the size of the land upon which it sits, it was a knockdown and development scenario. Instead, we restored the shack (using environmentally friendly practices) and preserved it for many more generations to come. After friends and family who came and experienced the restored shack encouraged us to share it and our sustainable and environmentally friendly principles with others we began making it available on Airbnb. Our aim was simple: to positively influence the environment and our guests, one couple one weekend at a time. Judging by the amazing feedback we've received to date The Little Black Shack has done just that. Perhaps you'd like to visit the shack and see what successful, low impact eco-tourism can look like.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend local transport, boat hire, cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. How can the government allow thousands of families to use their homes on Pittwater's Western Foreshores and Scotland Island (designated bushfire zones) yet prohibit guests from staying in the exact same homes? Are guests lives more important than home owners? The impact this will have on owners, property values, the tourism industry and local businesses will be catastrophic. Has government looked at the number of properties that are in Bush Fire Zones? For instance, the entire village of Thredbo falls under this category.

I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

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I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Ingrid Kwong  
29 Ross Smith Parade  
Great Mackerel Beach, Nsw 2108

**From:** no-reply@planning.nsw.gov.au on behalf of Department of Planning,  
Industry and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Thursday, 15 August 2019 1:36 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Cc:** DPE PS ePlanning Mailbox  
**Subject:** Have your say on Short Term Rental Accommodation

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category

Submitted on Thu, 15/08/2019 - 13:36

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Ingrid

**Last name**

Taylor

**Name withheld**

No

## Info

**Email**

[ingrid.t@bigpond.net.au](mailto:ingrid.t@bigpond.net.au)

**Suburb/Town & Postcode**

Robina

**Submission**

I own a holiday house in the Casuarina area and believe strongly that as a home owner we should have the right to earn some income from this asset in order to afford to keep it. I completely understand that neighbours needs to be respected with regards to noise etc - but I would vote strongly for allowing short term holiday letting

**I agree to the above statement**

Yes

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# INNER WEST COUNCIL

11 September 2019

Director, Housing and Infrastructure Policy  
NSW Department of Planning, Industry and Environment  
GPO Box 39  
SYDNEY NSW 2001

Dear Sir/Madam,

## **SHORT-TERM-RENTAL ACCOMMODATION REFORMS - INNER WEST COUNCIL SUBMISSION**

Thank you for the opportunity to provide feedback on the draft Short-Term Rental Accommodation (STRA) reforms. With the growing demand for STRA, Inner West Council supports the initiative of a state-wide planning framework to better manage its impacts.

Council acknowledges the need to establish a regulatory framework that balances the benefits that STRA delivers to the local economy with the potential adverse amenity impacts it has on residential areas, such as noise, anti-social behaviour and increased rental stress.

Central to Council's ongoing concern regarding STRA is its potential impact on the availability of housing supply for long term rental in the Inner West LGA. As raised in our previous submission, dated 16 November 2018, Council considers the period of up to 180 days, essentially 6 months, of the year appears to be too high and that as a result the proposed framework would set a balance that is still strongly on the side of STRA and not the long term rental market.

Council identified this concern in its earlier submission and it appears that the issue has not been given consideration in the development of the now proposed measures. Council requests that this matter be given further consideration before measures are introduced that have the potential to further impact on already high levels of unaffordability of rental properties in the Inner West.

A significant proportion of the Inner West LGA already experiences high levels of housing unaffordability. Council's draft Housing Strategy<sup>1</sup> highlights that short-term letting is already affecting the availability of rental properties in the Inner West, given its close proximity to Sydney CBD. The number of dwellings frequently available on Airbnb represents 69% and 44% of the vacant rental stock available in the former Leichhardt and Marrickville local government areas respectively (pp. 172-173). Therefore, Council urges the NSW Government to reconsider the 180 day threshold and lower the maximum day cap.

This letter includes further Council's comments in relation to the draft instruments, regulations and Code of Conduct as exhibited on 14 August 2019.

- 180 Days Threshold for Unhosted Premises in Greater Sydney

Inner West Council continues to be concerned that the 180 day threshold would not adequately address the potential impacts it would have on reducing the supply of dwellings available for long term rental. Council's draft Local Housing Strategy outlines that the proposed policy to allow a 180 days per year for unhosted short-term letting will continue to erode the availability of rental properties in the Inner West, potentially leading to the following impacts:

- Removal of properties from long-term rental market further increasing housing and rental prices through lack of supply;
- Incentivising short term leases (six months) while property owners utilise the short term letting arrangements for the remainder of the year;
- Further decreasing rental vacancy rates. Inner West currently experiences a below 3% vacancy rate in every suburb except for St Peters (refer to Appendix E-5 of the draft Local Housing Strategy);
- Contributing to further instability for renters. Currently 12,000 (or 7%) of the Inner West population experiences rental stress.

Further to note, the Inner West LGA is identified under SEPP 70 – Affordable Housing (Revised Scheme) as an area that is in need for affordable housing. Generally, LGAs identified in this SEPP are also areas where demand for STRA is high.

In consideration of the above, the proposed period of 180 days per year provides a balance that is still in favour of STRA. This would be detrimental to the long term rental market for the Inner West, especially at a time where housing affordability remains a key challenge in Greater Sydney. Council urges the NSW Government to reconsider the proposed period as it would not address the housing unaffordability in the Inner West and would not discourage long term residential dwelling from being used as STRA on a commercial basis.

The analysis on which the proposals are founded in the respect of the impacts on housing supply and affordability needs to be identified for all stakeholders involved to understand. In the absence of this, Council recommends the Government considers other options in relation to the proposed threshold including:

- Reduction of the maximum number of days (e.g. to 90 days in alignment with the Standard Instrument definition of boarding house that means providing a principal place of residence that is for 3 months or more);
- Exclusion of the Inner West LGA from being applicable for the 180 day threshold;
- Implementation of the current 180 day threshold on a temporary basis but allowing Council to monitor the impacts on the long term rental market once the STRA policy comes into effect and give power to Council determine the appropriate threshold in the future.

#### • Burden of Compliance

Council is supportive of the Code of Conduct that provides an alternative pathway to resolve disputes and complaints regarding the use of STRA. Council's main concerns relate to ensuring future compliance with the proposed regulatory framework.

It needs to be noted that Council is limited in resources to undertake meaningful investigations into dwellings that are contravening the requirements under the draft SEPP. For instance, to determine whether a STRA booking is made in a premise where the host is not present, Council would require a new team of officers to enter dwellings to investigate this matter. In addition, Council is restricted in its powers to enter any residential property and can only enter on the permission of the owner or occupier.

In light of the above, compliance and enforcement of the proposed regulation by Council is considered to be impractical. Council is supportive of a framework that does not require intervention by Council. The introduction of the proposed register and Code of Conduct should be enforced by Fair Trading, supported by online booking platforms (e.g. Stayz and AirBnb) being required to make data accessible to help alleviate some of the burden on Council's resources.

#### • Legal Definition

The draft SEPP at Clause 9 (2) (b) includes certain types of dwellings that may not be used for STRA. These prohibited dwellings include the term "boarding house". Council strongly agrees with this proposed prohibition under the SEPP but requests the SEPP to go a step further.

The term boarding house has a number of meanings, and those which are prohibited should be clearly defined so that there is no question of their inability to be used under the draft SEPP for STRA use.

Definitions which Council recommends be included and prohibited under Clause 9 (2) (b) are:

1. A boarding house under Division 3 of SEPP (Affordable Rental Housing) 2009. This is because the SEPP itself within its objectives (refer to Clause 3 for the aims of the Policy) relates to promoting affordability. Under Clause 6 there is a definition of affordable housing which would likely preclude STRA.
2. A boarding house under a Standard Instrument LEP. In the Dictionary to the SI LEP :  
*boarding house means a building that:*
  - (a) *is wholly or partly let in lodgings, and*
  - (b) *provides lodgers with a principal place of residence for 3 months or more, and*
  - (c) *may have shared facilities, such as a communal living room, bathroom, kitchen or laundry, and*
  - (d) *has rooms, some or all of which may have private kitchen and bathroom facilities, that accommodate one or more lodgers, but does not include backpackers' accommodation, a group home, hotel or motel accommodation, seniors housing or a serviced apartment.*
3. Under the *Boarding Houses Act 2012* a registerable boarding house is one which provides fee for reward for 5 or more residents.

Other than these there are other definitions in, say, the various pieces of taxation legislation dealing with concessions for boarding houses. Council is keen to have the land uses specified above to be defined within the draft SEPP so that there can be no question the SEPP does not apply to those three discrete land uses.

- Housing supply and Building Defects

Council is concerned that the policy may lead to an increase in the amount of apartments held by developers off the market after completion to be used for STRA. By enabling STRA through exempt and complying approval pathways, it may encourage a profitable alternative land use tool for developers of high rise apartment buildings, where a majority of apartment dwellings can be withheld from the market during the warranty period for major building defects.

The proposed regulatory framework does not adequately address the potential adverse impacts of STRA on building quality and housing affordability in terms of rental apartments and apartment prices. Further consideration should be made in incorporating measures to prevent new apartment buildings over 3 storeys to be used for the purpose of STRA within the first 6 years from completion.

- Strata By-Laws

The clarification of strata schemes entitled to prohibit STRA, for lots that are not a host's principal place of residence is supported, noting a 75% majority vote is required. Any such by-law that is adopted by strata schemes will be acknowledged by Council.

- Exclusion Register

The initiative to develop an exclusion register to prohibit a host or guest from participating in the STRA industry for a period of five years is supported. However, Council is concerned about the ability of the register to draw a distinction between different hosts letting out the same premises. For example, a host who is included on the exclusion register can receive the assistance of an associate to rent out a premise on their behalf. This undermines the veracity of the registration system in penalising participants that have contravened the proposed Code of Conduct.

Council recommends the exclusion register should include properties, not just the host, in circumstances where the host has breached the Code of Conduct and is the principal owner of a property. This will limit associates of the host, from renting out a premise on the behalf of an excluded host, and ensure greater compliance with the proposed Code.



- Industry Led Property Register

The introduction of a property register is supported as it will provide the necessary data to assist Council to manage and respond to complaints relating to the use of dwellings for STRA in the Inner West.

Council notes that in order for the register to operate and ensure compliance effectively, it is important that online booking platforms, such as AirBnB and Stayz, share accurate and live booking data with the industry. Without making this data accessible, it will be challenging for the industry to regulate the 180 day threshold.

In consideration of Council's limited resources, online booking platforms should incorporate measures on their websites to enforce the threshold by blocking users from booking premises that have breached the day cap. This will enable Council to focus resources to investigate serious breaches and on listed premises that has gone over the threshold.

Therefore, Council makes the following recommendations to online booking platforms to consider:

- *Cross platform collaboration* – Online booking platforms should share data with each other to prevent hosts from evading the day cap by renting out the same unhosted premises on separate booking websites.
- *Automated day limit counter* - To ensure compliance with the annual day cap limit, online booking platforms should enforce it through an automated day-counter. Any listing that goes over the day limit should be blocked from having the booking functionality. This day counter should also be applied at a cross platform level.

- Un-hosted STRA bookings of 21 or more consecutive days

Council notes the inclusion of 21 days or more consecutive days as an exemption to the applicable day limit threshold relates to low amenity impacts from longer bookings and to support mobile workers. However, with no clarification into how each booking would be scrutinised, Council is concerned that this exemption can be counter-productive to the proposed efforts in regulating unhosted STRA.

For example, a host can potentially rent out a premise to a close associate as a tokenistic effort for 21 or more consecutive days to reset the threshold. Coupled with the proposal to permit non-hosted STRA as either an exempt or complying development (where **entire** rental dwellings can be rented out), the exemption to not count unhosted booking days to the day cap would continue to encourage whole conversion of residential rental dwellings into STRAs being run on a long term commercial basis.

The proposed exemption digresses from one of the main purpose of the reform which is to regulate the adverse impacts on residential amenity and housing supply and affordability caused by short term letting being operated as a commercial business. Therefore, Council recommends that this exemption be removed or be implemented on a basis that is more suited for certain communities.

Council trusts the feedback as raised above would be considered and is looking forward to further advise the Department in the delivery of this much needed reform on the planning framework for STRA. Should you have any enquiries please contact **Alan Chen**, Strategic Planner, on 9392 5265.

Yours sincerely



**David Birds**  
**Group Manager Strategic Planning**

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 5:14 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Rob submission 3.0, non Air BNB run, council submission

Submitted on Wed, 11/09/2019 - 17:11

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

**First name**

Alan

**Last name**

Chen

**Name withheld**

No

## Info

**Email**

[alan.qi.chen@innerwest.nsw.gov.au](mailto:alan.qi.chen@innerwest.nsw.gov.au)

**Suburb/Town & Postcode**

Ashfield 2131

**Submission file**

[short-term-rental-accommodation-reform---inner-west-council-submission.pdf](#)

**Submission**

Hi - the attachment is Inner West Council's submission letter to the STRA reform.

Please message me once you received this submission.

Regards,

Alan

**I agree to the above statement**

Yes

17 September 2019

Director, Housing Policy  
NSW Department of Planning, Industry and Environment  
GPO Box 39  
Sydney NSW 2000

Dear Director,

### **INQUIRY INTO SHORT TERM RENTAL REFORMS AND CODE**

The Insurance Council of Australia (ICA) welcomes this opportunity to provide a submission on short-term holiday reforms and proposed code in NSW.

The Insurance Council of Australia (ICA) is the industry association for the general insurance industry. ICA members provide a wide range of insurance products including home and contents insurance, landlord insurance, strata insurance and public liability insurance.

The ICA last made a submission to government on this issue in November 2015.

Since that time the industry has further evolved products for short-term rental (STR) activities. There are now a number of insurers within the market who offer this cover to policyholders seeking to use part or all of their property for STR.

Members of the public are able to locate an insurers who offer this cover via the ICA's Find an Insurer service at [www.findaninsurer.com.au](http://www.findaninsurer.com.au)

Find an Insurer is an online search portal for insurers and products, established in 2012 by the ICA. To assist with increasing demand, a category for STR was added to the portal in January 2016. Following this addition, the service has received 19,943 online enquiries and 1,521 telephone enquiries in relation to STR policies to date.

#### **Information to improve the code**

The ICA does not have detailed views on the types of STR information that would be useful for the Secretary to collect. However the industry would be open to working with the Secretary on insurance issues where they may assist future maturation of the STR code.

#### **Obligations under the code**

With regard to the obligations of STR hosts and related parties, the ICA believes the current provisions are sound. However, the industry is concerned about the level of insurance cover that hosts may or may not have.

Most insurers regard STR as a business activity. Neither standard home insurance or landlords insurance are specifically designed to cater for STR exposures. Homeowners and renters could incur uncompensated financial loss if the STR operator does not hold the correct type of

insurance. For example, a standard home insurance policy may not cover for theft or accidents that have occurred as a result of STR activity.

### **Complaints process**

Any complaints relating to insurance under Part 6 of Code, should be managed under existing insurance industry complaints processes detailed in the general insurance industry code of practice at [www.codeofpractice.com.au](http://www.codeofpractice.com.au).

### **Strikes recorded under the code**

Strikes recorded as '*a host failing to comply with their insurance obligations and the failure is not minor*' requires greater clarity and alignment with products currently available in the market.

The industry would like to open discussions on this point, to ensure that hosts are able to comply with this requirement by obtaining insurance coverage that is deemed to meet the obligation.

### **Support for the code**

The general insurance industry is supportive of the STR Code. However, the industry has no capacity to contribute to the costs or enforcement of the Code. As this regulatory framework was established by the NSW Government, such activities must fall with their remit.

### **Transition period**

To ensure hosts have compliant and up-to-date insurance policies, the ICA recommends a transition period to allow policyholders enough time to make necessary changes to avoid strikes.

As with other successful regulatory changes requiring adoption by community members, a strong communications plan should be implemented to help homeowners and STR suppliers understand STR code requirements for insurance. The ICA would welcome any opportunity to help shape that communications effort.

If you have any queries please contact Karl Sullivan, Head of Risk and Operations via email [ksullivan@insurancecouncil.com.au](mailto:ksullivan@insurancecouncil.com.au) or phone (02) 9253 5155.

Yours sincerely



Robert Whelan  
Executive Director & CEO

**From:** Karl Sullivan <ksullivan@insurancecouncil.com.au>  
**Sent:** Tuesday, 17 September 2019 11:56 AM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission STRA  
**Attachments:** 2019\_09\_17\_ICA\_Submission\_short term rental reforms and Code.pdf;  
ATT00001.htm

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Tessa Submissions

Please find attached a short submission on the STRA reforms.

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**From:** Iona Roumeliotis <iona@artechne.com.au>  
**Sent:** Wednesday, 11 September 2019 2:20 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it provides an easy & affordable forum to access potential guests.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Iona Roumeliotis  
1 Myrtle St  
Leichhardt, Nsw 2040



**From:** Irena hutchings <irena@paperbarkcamp.com.au>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...we are elderly and have a large home which costs a lot to maintain, so extra income keeps us in our home instead of selling for something smaller,

.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing

- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

#### STRA Property Register

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Thank you for reading my submission.

Regards,  
Irena hutchings  
605 Woollamia Rd  
Woollamia, Nsw 2540

**From:** Iryna White <irinadigi@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:20 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because I have no other job, I need to support myself and my family. I was very happy to find Airbnb as a source of income. I meet new people and it makes my life happier and it takes me away from depression.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

#### STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

#### Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
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## STRA Property Register

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Iryna White  
12 Lakelands Cl  
Shell Cove, Nsw 2529

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 11:29 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** recorded in DPIE subs register

Submitted on Wed, 11/09/2019 - 11:28

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Isaac

**Last name**

Shapiro

**Name withheld**

No

## Info

**Email**

[namaskar@ozemail.com.au](mailto:namaskar@ozemail.com.au)

**Suburb/Town & Postcode**

Tyagarah

**Submission**

NSW is out of step with locations all over the world. Major towns and cities are placing restrictions on Air BnB but in NSW the state government appears to have allowed the short term letting

accommodation industry to write the rules.

The new legislation places a cap on days allowed for letting, where the host is not present, of 180 days per year or 365 days in regional areas. Byron was promised a 90 day limit in the run up to the last election but it is still to be approved and Council has to prove its case as to why Byron gets special treatment before it is approved. 90 days is still 45 weekends a year and, given weekend prices, this is likely not a deterrent to making owners return houses to the permanent rental market.

Unlimited days - no caps: Also, a loophole has appeared in the proposed regulation: a booking for 21 or more consecutive days will not count towards the limit when a host is not present. So a cap is not really a cap!! This means the true extent of short-term letting can never be monitored or measured. A host could add as many 21-day letting periods as they want and it would not be counted in the annual total!

**I agree to the above statement**

Yes

**From:** no-reply@planning.nsw.gov.au on behalf of Department of Planning,  
Industry and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Wednesday, 14 August 2019 4:32 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Cc:** DPE PS ePlanning Mailbox  
**Subject:** Have your say on Short Term Rental Accommodation

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category

Submitted on Wed, 14/08/2019 - 16:32

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

**First name**

Italo

**Last name**

Tius

**Name withheld**

No

## Info

**Email**

[italo.tius@gmail.com](mailto:italo.tius@gmail.com)

**Suburb/Town & Postcode**

2095

**Submission**

Our apartment block is in Manly and is presently classified as long term lease only. Some blocks next to or near us have short term leasing and it becomes an absolute nightmare, especially in any holiday season.

Many holiday makers seem to throw all caution to the wind once they book into their temporary holiday accommodation. This makes it a living nightmare for the permanent residents.

We're hoping to keep our block as a long term leasing block as it is presently. Life in our block is a lot more peaceful... and safer than any of the short term blocks near us.

**I agree to the above statement**

Yes

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If you are not the intended recipient, please notify the sender and then delete it immediately.

Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the NSW Office of Environment and Heritage.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL



**From:** no-reply@planning.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Tuesday, 20 August 2019 1:51 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Submitted on Tue, 20/08/2019 - 13:50

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

**First name**

J

**Last name**

Sersansie

**Name withheld**

No

## Info

**Email**

[villasatbyron@gmail.com](mailto:villasatbyron@gmail.com)

**Suburb/Town & Postcode**

2481

**Submission**

As you know the Industry has come under even tighter scrutiny since the rise of Airbnb which has unfortunately brought a huge increase in un-regulated and ill-supervised Holiday Letting. A problem not

only Byron Bay has faced, it's global. Cities like Madrid, London, New York's have all been addressing the issue, but unlike Byron, their economies obviously survive with or without Holiday 'House' style Accommodation (who wants 50 high-rise Hotels in Byron Bay, not us, nor the local community).

Here in Byron, Suffolk and Brunswick Heads it's complex and I can understand where some of the opposition to our Industry is coming from, certainly with more regulation and possible registration, part of the problems here could be addressed. Large numbers of Tourists vs the number of rate payers does put strain on the Council to support and even improve infrastructure and amenities. I believe, as many do, that the NSW or Federal Government's Tourism Departments should contribute to Byron Bay's economics as it IS a desired holiday destination, known globally, as is being proven by the numbers of visitors from all over the World. It has really become a 'must go' place. As John Gudgeon, Chariman of Byron Bay's HLO Inc, Byron should be a JEWEL of Australia and needs better Management / funding.

The suggestion of a CAP to the amount of days we will be permitted to rent IS ABSOLUTELY OBJECTED TO. I would think Council just want to limit days which would mean the town is dead for the low seasons - job losses, shop closures - half town closed for Winter, we do not want. It would indeed cause huge problems for sustainability for local businesses and employment, negative effect on Property incomes etc.

Visitors do contribute significantly to many facets of our economy in my eyes - all of the above, employment as a result of Tourism and STHL is also significant. Many Trades and Businesses I deal with rely, on the majority or 100% on the Holiday Letting Industry, which in turn feeds our local economy by having rate payers employed, in work and tax liable.

The commercial retail rental side of Byron Bay is quite outrageous but no-one seems to be looking at what the Real Estate Agents are doing, charging huge amounts of retail rent which in turn kills off local enterprise. This is a point that should be highlighted indeed to Government. Who is going to support the plethora of shops, restaurants and cafe's paying huge amounts of rent with over the top increases per year etc if we limit Tourism. This I don't understand.

Let's see what this 'Consultation' process can provide, but I do recommend that a greater Government Tourism contribution is required. The amount of income these 3rd party booking sites make from our Industry is huge. I think they should contribute part of their commission/booking fee income to the town, it should not just be put on 'us' or the visitors alone. Obviously in addition to this the Federal Government needs to be collecting Tax from these companies who are based off shore but reap huge amounts of income out of our Tourism industry. (Airbnb USA, HomeAway NL etc, Booking.com NL).

Many of my Owners have invested in Superannuation type purchases and have huge mortgages, they need this income to continue Ownership of their properties, not all are money grabbing greedy Capitalists and certainly care for and contribute significantly to Byron Bay/Suffolk Park local economies.

DO NOT LET BYRON COUNCIL CAP OR RESTRICT, THE ECONOMICAL DOWN SIDE WILL BE SIGNIFICANT AND JEOPARDISE THE SURVIVAL OF BYRON BAY AND SUFFOLK PARK.

**I agree to the above statement**

Yes

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This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it immediately.

Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the NSW Office of Environment and Heritage.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

**From:** no-reply@planning.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Tuesday, 20 August 2019 2:13 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Submitted on Tue, 20/08/2019 - 14:13

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

J

**Last name**

Sersansie

**Name withheld**

No

## Info

**Email**

[jsersansie@gmail.com](mailto:jsersansie@gmail.com)

**Suburb/Town & Postcode**

Byron Bay/2481

**Submission**

This is a beachside tourist town. Fact.

What does Byron Council propose the thousands of people who rely on STHL to do for employment if the industry is cut off at the knees with a cap on allowance to Holiday Let. We do not want HIGH RISE HOTELS here. The appeal of Byron is that it is not over developed like the Gold Coast and offers a relaxed option for a beach and nature holiday.

I have lived in Byron Shire for 13 years and have solely relied upon this industry for employment and financial support of my family (single parent). My Child attends Byron Bay Public School where there are over 500 students, all who live locally. Byron Council have got it WRONG, who says there is no community here, I am it and so are all the parents of the school children in ALL local schools here. Do not cut the Industry off, regulate it and make it accountable. This will get rid off the ill-managed properties where objections to quiet enjoyment of neighbours is expected to be respected.

I manage many houses here and most sleep 12 Guests. I very rarely get complaints from neighbours, am registered with the HLO Inc (John Gudgeon's company) and licensed. All my properties have fire checks and safety equipment, rubbish collected weekly and serviced.

It will kill our town if restrictions to amount of days are put in place - do we want half the town closed during non-peak seasons. Look at the rent being charged by Real Estate Agents on the commercial side. One local Physio on Shirley Street who has worked in this town for 30 years had his rent put up by \$2000 pm and had to move out. This is a loss to our community. Only one example - shops are closing and for rent signs all over the place.

We need help for Byron Council to better manage the towns, no facilities for young Children - no skate park or play area other than the toddler area opposite Main Beach, public toilets and facilities. Look at where the Council spends its money and not waste time and our taxes constantly objecting to the only major income stream this town has.

**I agree to the above statement**

Yes

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This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it immediately.

Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the NSW Office of Environment and Heritage.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

**From:** John Howarth <158nf@comcast.net>  
**Sent:** Friday, 6 September 2019 11:54 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens on our operations.

As a responsible operator, I support the creation of a cost-free register of all holiday rental properties listed on a platform and the code of conduct provided these do not add to my costs. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

In NSW we face very high costs, often imposed by governments such as land tax (my second biggest cost after mortgage interest), council rates, electricity, and gas (electricity and gas are included because government policy has caused their costs to skyrocket). Others include mortgage interest, maintenance caused by the severe conditions at our coastal location, and cleaning which in itself employs 3 people. I need higher revenue than 180 nights will provide, in order to cover these costs.

If a 180 night limit is arbitrarily imposed, I foresee that holiday rents will rise as property owners restrict their availability to high demand periods. The consequence of this is that with less supply in off-peak periods, there will be fewer properties available which will then raise their rents. At the same time, property owners will need to raise rents in peak periods such as school holidays in order to generate enough annual income to cover costs for the periods when this proposed policy will force vacancies.

There is an abundance of evidence that when governments have interfered with the free market, there are unintended consequences. Diminished supply and higher rents will be two of them.

Yours faithfully,

J.A. Howarth,

Azure on the beach,

Boomerang Beach NSW 2090

Email: [azure@optusnet.com.au](mailto:azure@optusnet.com.au)

**From:** Jacinda Lindsay <j.kostovski@y7mail.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

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Thank you for reading my submission.

Regards,  
Jacinda Lindsay  
5 Edward St  
Barrack Heights, Nsw 2528

**From:** Jack Fiddis <jackfiddis@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

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Thank you for reading my submission.

Regards,  
Jack Fiddis  
19 Meares Pl  
Kiama, Nsw 2533

**From:** no-reply@planning.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Friday, 23 August 2019 9:31 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category

Submitted on Fri, 23/08/2019 - 09:31

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Jack

**Last name**

Haley

**Name withheld**

No

## Info

**Email**

[jack777@bigpond.net.au](mailto:jack777@bigpond.net.au)

**Suburb/Town & Postcode**

Maroubra 2035

**Submission**

If the proposed Register is to be managed by the industry, the total content must be available to anyone with an interest, including members of Strata Committees.

**I agree to the above statement**

Yes

**From:** justin woodcock <jwoodcock@thelem.com.au>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because the flexibility in both, personal accommodation and renting, provides my family and I the options of receiving rental income, and also using the property for our own personal use. It creates another valuable and more flexible form of real estate leasing.

I can only see benefits in providing travellers with an additional form of accommodation option. If the key risks to short term accommodation are managing disruptive behaviour by a few, then these proposed legislative changes are excessive and a significant burden on both owners and Government. I always thought the Liberal Party were for entrepreneurialism, a free market and innovation? These proposed legislative changes do not reflect those values.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

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Thank you for reading my submission.

Regards,  
justin woodcock  
29 King Edward St  
Pymble, Nsw 2073

**From:** Jackie scott <jackie-scott@live.com.au>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

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Thank you for reading my submission.

Regards,  
Jackie scott  
30 Winsor St  
Merewether, Nsw 2291

**From:** Jacob Ralph <Jacob\_Ralph\_80@hotmail.com>  
**Sent:** Thursday, 5 September 2019 9:23 AM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission by Jacob Ralph for Holiday rental regulations for NSW  
  
**Categories:** Purple category

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens on our operations.

As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

Please consider amending the following proposal:

- Where the host is not present, and the site is not on bushfire prone land or a flood control lot, STRA is 'exempt development' for: ▪
  - 180 days in Greater Sydney
  - 365 days if the STRA owner's principle place of residence is within a 10 km radius of the STRA in Greater Sydney
  - 365 days in regional areas; except where a council varies this to no lower than 180 days.

As a property owner, I do not necessary need to be present at the property to ensure that the guests needs are met and that the neighbours right to peaceful enjoyment of their place is maintained. Many of the problems with Metropolitan areas such as Sydney are due to 'agents' operating multiple STRA without appropriate oversight. As the property owner, I have a vested interest in maintaining good condition of the my property and good relations with the neighbours. As I live in the neighbourhood, I can attend the premises immediately if there are any issues. This addition would still meet the intent of the regulations and reign in rouge STRA agents but also give property owners a little more flexibility on how they lease the premises if they are prepared to manage the property themselves in person.

Thank you for your consideration

Jacob Ralph

0438 377 835

**From:** Jacqueline Fredericks-Smith <jacquie\_fs@yahoo.com.au>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations. I have a four bedroom modern home in Maryville NSW

I host on Airbnb because it provides me with an opportunity to run a small business (with an abn, where I pay all correct tax), as I have a disability, and I would otherwise be on a government paid pension. I pride myself on being self sufficient financially. I provide families and friends an opportunity to stay together in one large house at a very affordable price. These guests spend money on shops, food and tourism whilst in Newcastle every weekend, as I am regularly booked with regional, interstate and international travellers who are attending events such as university / Tafe graduations, weddings, concerts, Hunter Valley, Port Stephens, local markets, conventions/trade shows, birthdays, sporting events and competitions, and local business, etc.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home rendering it unviable and forcing me to close my small business.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

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Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW

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I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Jacqueline Fredericks-Smith  
56 Lewis St  
Maryville, Nsw 2293

**From:** JACQUELINE SALIBA <im.jaq.9@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because I am a single mum and our home provides an extra source of income which enables me to spend more time with my 1 year old son. I rely on the extra income. It helps me pay my mortgage and our bills. Without it I would have to put my son in childcare full time, which as you know is incredibly expensive in NSW.

As an Airbnb host, I make sure that my guests hear about local attractions and businesses which boosts tourism and business.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

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Thank you for reading my submission.

Regards,  
JACQUELINE SALIBA  
40-42 Ramsgate Ave  
Bondi Beach, Nsw 2026

**From:** Jacqueline Wilkes <wwsurfers@yahoo.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because in an area of low unemployment it is one of the only means to make an income without depending on government handouts.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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Regards,  
Jacqueline Wilkes  
71 Seaside Parade  
Dolphin Point, Nsw 2539



**From:** Jacqui Brady <jacqui\_bc@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

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Thank you for reading my submission.

Regards,  
Jacqui Brady  
MacLeay St  
Sydney, Nsw 2011

**From:** Jacqui Brookes <ozbrookes@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

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I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Jacqui Brookes  
70 Phillip Dr  
South West Rocks, Nsw 2431

**From:** Jacqui Lachmann <jaclachmann@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:21 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because we have space in our house that is excess to our family's requirements. As the mother of small children, earning money through hosting allows me to contribute to our family's income while still being available to care for the kids, avoiding paying for childcare. Whilst the space we use for hosting is self-contained, it does not have kitchen facilities and is not suitable for long-term accommodation- therefore we are not reducing the availability of rental housing in our area. We are present on the property whilst we host, therefore able to prevent any noise or nuisance issues that could affect neighbours. We purchase additional public liability insurance on top of the insurance supplied by Airbnb.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that

hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

#### STRA Property Register

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#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Jacqui Lachmann  
32 Greenfield Rd  
Lennox Head, Nsw 2478

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Monday, 9 September 2019 1:03 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** recorded in DPIE subs register, Purple category

Submitted on Mon, 09/09/2019 - 13:03

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Jacqui

**Last name**

Willoughby

**Name withheld**

No

## Info

**Email**

[jac.willoughby@gmail.com](mailto:jac.willoughby@gmail.com)

**Suburb/Town & Postcode**

Mosman

**Submission**

I am relieved to see government investigating this issue. This market is unregulated and has enormous impacts on residents in their homes.

The disregard to noise, rubbish management, large visitor numbers and a residents right to enjoy their home and community needs careful and expert investigation.

I trust all persons involved in the decision making process who have a conflict of interest will disclose as such.

**I agree to the above statement**

Yes



**From:** Jade Group <lisa@jadegroup.com.au>  
**Sent:** Tuesday, 10 September 2019 8:00 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** recorded in DPIE subs register, recorded and not sent to DCS

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because I enjoy providing families who are travelling affordable accommodation. Prior to Airbnb, our family of five struggled to stay anywhere in the inner cities of Australia that was affordable as hotels don't cater well to the family market. I love that now as I travel I can stay in lovely affordable homes and in turn I chose to host families.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

I am concerned about the Government's approach, and parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

I am opposed the 180 night cap in Sydney when hosts are not present. I feel there is a real lack of affordable accommodation for travelling families and the introduction of the 180 day cap will significantly reduce the number of available properties for travelling families and will only add to that shortage. If affordable housing is the issue why not introduce a 10% tax after 180 days per annum and use that money towards housing projects.

I believe the 180 day cap should not apply to buildings zoned for short term stays or buildings zoned as serviced apartments. In those buildings owners should have the right to lease out their property 365 days a year because owners invested enormous amounts of money in to those buildings with the belief that there was no limitations to their usage and imposing a 180 day cap to buildings zoned for short term stays or as serviced apartments is unjust.

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a

significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

#### Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

Thank you for reading my submission.

Regards,  
Jade Group  
243 Pyrmont St  
Pyrmont, Nsw 2009

**From:** Jade Hajj <jadehajj@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Rob submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it helps my wife and I pay the mortgage. We are a young married couple who work hard and still struggle to make ends meet with crazy apartment prices. Airbnb supports us with a little extra income that really helps with the mortgage.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism. I've made a booklet, like many others, with pictures and addresses of local businesses.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

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#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Jade Hajj  
503 Bunnerong Rd  
Matraville, NSW 2036

**From:** Jade Peters <jadepeters2000@yahoo.com.au>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it provides necessary income to support my daughter as a solo parent.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

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Thank you for reading my submission.

Regards,  
Jade Peters  
273-275 Avoca St  
Randwick, NSW 2031

**From:** Jamie Gonzalez <jamie@jamiegonzalez.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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Thank you for reading my submission.

Regards,  
Jamie Gonzalez  
68 Lamrock Ave  
Bondi Beach, Nsw 2026



**From:** Jaimie Anastas <jaimie@enagroup.com.au>  
**Sent:** Wednesday, 11 September 2019 2:20 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

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Thank you for reading my submission.

Regards,  
Jaimie Anastas  
906 Elizabeth St  
Zetland, Nsw 2017

**From:** Hostie Admin <admin@hostie.com.au>  
**Sent:** Friday, 16 August 2019 8:51 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Re: Holiday rental regulations for NSW

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category, sent

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens on our operations. My business operates & co-ordinates short term rentals on behalf of owners. Our services are specific to the holiday rental industry & we follow all laws and regulations like any other real estate. We ensure the premises are safe, clean and well maintained for guests safety. We also screen guests, enforce house rules and promptly deal with any kind of guest misconduct 24/7.

All the properties I manage have restrictions. We limit no. of persons per property, set noise restrictions, cleaning standards, safety checks and inspections, guest screening and terms & conditions of booking. If an owner would like to rent a property on a short term basis outside of maximum limit could professional management be an option?

As a responsible short term rental property management business & operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

As holiday rentals like the one's I manage become more important to the tourism economy, it's my strong belief the NSW Government should build a regulatory solution that ensures the sector can reach its economic potential.

Thank you reading my submission.



**Jaina Wuellner**

**Airbnb Property Management | Host**

|

Mobile: 0422 545 066

Web: [www.hostie.com.au](http://www.hostie.com.au)

Address: PO BOX 209, Bogangar NSW 2488



**From:** no-reply@planning.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Sunday, 1 September 2019 4:42 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Purple category

Submitted on Sun, 01/09/2019 - 16:41

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Jake

**Last name**

Bohl

**Name withheld**

No

## Info

**Email**

[jakebohl@me.com](mailto:jakebohl@me.com)

**Suburb/Town & Postcode**

Cooma

**Submission**

I have multiple properties on Airbnb and made a lot of money off it! But it is out of control and it's overloading towns and infrastructure in areas like the snowy mountains because there is too much accommodation on offer compared to the facilities. Not to mention the people that don't have holiday

letting approval. I also own a motel and have been massively impacted by the this unregulated accommodation on offer. It's making it so the ski resorts actually stop letting people enter the resorts if you don't get up there by 830 on busy weekends. Which would be pretty shit if you spent thousands of dollars to be there and you can't get there. Not to mention that Airbnb would not be paying any tax to our country to fix any of these infrastructure problems either. But in the meantime I'm gonna keep using it as makes me a lot of money. But I'm ready for it to change..

Shut it Down!

**I agree to the above statement**

Yes

26<sup>th</sup> October 2017

**Director, Housing Policy  
Department of Planning and Environment  
GPO Box 39, Sydney NSW 2001**

Email: [sth1@planning.nsw.gov.au](mailto:sth1@planning.nsw.gov.au).

Dear Director,

**RESPONSE - Short-term Holiday Letting (STHL) Options Paper**

As chairman of SP94816 which is a large residential building complex located at 28-30 Anderson Street, Chatswood, I write on behalf of the Owners Corporation to **OPPOSE** the use of short term lettings in strata title buildings for the following reasons:

- We highly value the following attributes of living in a building where only permanent residents are permitted with high levels of security, high sense of community; high standards of housekeeping and knowing our neighbours.
- Owner occupiers purchased into this property on the assurance of the Development Consent being of residential use, which in Willoughby LGA is a minimum occupancy of 3 months;
- Tenants have committed to leases of minimum of 6 months on the same basis;
- Increase strata levies to rectify the common property damage by short term tenants;
- Increase in noise and decrease parking availability;
- Time consuming for volunteer strata committees to manage;
- Reduce rental affordability;

We have a large number of owner residents with young children and a numbers of women living alone. We also have elderly residents. We have chosen to live in our building because of the safety and security it offers. We feel secure in allowing our children and grandchildren to play in the garden and pool knowing other users are residents.

All of the above are under threat if strangers are constantly permitted to occupy our apartments on short term lettings and deteriorate our building and community. Many of us would not have considered living in strata apartment as an option if there was a possibility of having to share our building with short term occupants.

We demand the government maintain the conditions of the Development Consent and preserve the integrity of strata living as an attractive choice to live in.

Yours Sincerely

Jam Xia  
Chairman SP94816  
The Chatswood, 28-30 Anderson Street, Chatswood NSW 2067

Cc:  
[gladys.berejikian@parliament.nsw.gov.au](mailto:gladys.berejikian@parliament.nsw.gov.au)  
[gail.giles-gidney@willoughby.nsw.gov.au](mailto:gail.giles-gidney@willoughby.nsw.gov.au)

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Monday, 9 September 2019 10:28 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Tessa Submissions, recorded in DPIE subs register, Purple category

Submitted on Mon, 09/09/2019 - 22:26

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

**First name**

Jam

**Last name**

Xia

**Name withheld**

No

## Info

**Email**

[jam2929xia@gmail.com](mailto:jam2929xia@gmail.com)

**Suburb/Town & Postcode**

Chatswood

**Submission file**

[short-term-letting---the-chatswood-sp94816.pdf](#)

**Submission**

Dear Director,

**RESPONSE - Short-term Holiday Letting (STHL) Options Paper**

As chairman of SP94816 which is a large residential building complex located at 28-30 Anderson Street, Chatswood, I write on behalf of the Owners Corporation to OPPOSE the use of short term lettings in strata title buildings for the following reasons:

- We highly value the following attributes of living in a building where only permanent residents are permitted with high levels of security, high sense of community; high standards of housekeeping and knowing our neighbours.
- Owner occupiers purchased into this property on the assurance of the Development Consent being of residential use, which in Willoughby LGA is a minimum occupancy of 3 months;
- Tenants have committed to leases of minimum of 6 months on the same basis;
- Increase strata levies to rectify the common property damage by short term tenants;
- Increase in noise and decrease parking availability;
- Time consuming for volunteer strata committees to manage;
- Reduce rental affordability;

We have a large number of owner residents with young children and a numbers of women living alone. We also have elderly residents. We have chosen to live in our building because of the safety and security it offers. We feel secure in allowing our children and grandchildren to play in the garden and pool knowing other users are residents.

All of the above are under threat if strangers are constantly permitted to occupy our apartments on short term lettings and deteriorate our building and community. Many of us would not have considered living in strata apartment as an option if there was a possibility of having to share our building with short term occupants.

We demand the government maintain the conditions of the Development Consent and preserve the integrity of strata living as an attractive choice to live in.

Yours Sincerely

Jam Xia

Chairman SP94816

The Chatswood, 28-30 Anderson Street, Chatswood NSW 2067

**I agree to the above statement**

Yes



**From:** no-reply@planning.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Tuesday, 27 August 2019 9:54 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Submitted on Tue, 27/08/2019 - 21:48

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

James

**Last name**

Abad

**Name withheld**

No

## Info

**Email**

[jimabad@gmail.com](mailto:jimabad@gmail.com)

**Suburb/Town & Postcode**

2261

**Submission file**

[short-term-holiday-submission-james-abad.pdf](#)

**Submission**

My name is James Abad. I request the following amendment to the Fair Trading Amendment (Short-term Rental Accommodation) Bill 2018 Schedule 2 Amendment of Strata Schemes Management Act 2015 No 50 Section 137A

**137A Short-term rental accommodation**

(1) A by-law made by a special resolution of an owners corporation may prohibit a lot being used for the purposes of a short-term rental accommodation arrangement if the lot is not the principal OR A SECONDARY place of residence of the person who, pursuant to the arrangement, is giving another person the right to occupy the lot.

(2) A by-law has no force or effect to the extent to which it purports to prevent a lot being used for the purposes of a short-term rental accommodation arrangement if the lot is the principal or OR A SECONDARY of residence of the person who, pursuant to the arrangement, is giving another person the right to occupy the lot.

(3) In this section, short-term rental accommodation arrangement has the same meaning as in section 54A of the Fair-Trading Act 1987.

Please refer to the attached submission for reasons and definition of a Secondary Place of Residence.  
Thank you

**I agree to the above statement**

Yes

**From:** James Avramides <james.avramides@lendi.com.au>  
**Sent:** Wednesday, 11 September 2019 2:16 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
James Avramides  
13 Zara Rd  
Willoughby, Nsw 2068

**From:** James Fulford-Talbot <james.ft@live.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because the size our mortgage is unaffordable if we don't and our property is key to our retirement funds.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

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Thank you for reading my submission.

Regards,  
James Fulford-Talbot  
32 Penrose Rd  
Bundanoon, Nsw 2578

**From:** James Lyell <jimmytwosox@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because I want to create an environment for tourism (our towns biggest economy) to coexist with the local community.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

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Thank you for reading my submission.

Regards,  
James Lyell  
20 Bangalow Rd  
Byron Bay, Nsw 2481



**From:** James Mayson <jamesmayson@yahoo.com>  
**Sent:** Thursday, 5 September 2019 11:23 AM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens on our operations.

As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the 90 night limit sought by Byron Shire Council as unworkable – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

Affordable housing is indeed a critical social issue and as such should be dealt with on a State and Federal Governmental level through construction of specific housing. To expect private home owners who have purchased their property under existing legislation, to completely change their use is poor governance. To retrospectively enforce home owners to adhere to a shortage in the market created by lack of governmental land release, affordable housing and DA restrictions that exclude reasonable provision of tourist accommodation, is unethical and short sighted.

Regards,

James Mayson

**From:** James Price <jim\_price@glenrose.com.au>  
**Sent:** Wednesday, 11 September 2019 2:20 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

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Thank you for reading my submission.

Regards,  
James Price  
11 Sandy Beach Rd  
Korora, Nsw 2450

**From:** no-reply@planning.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Monday, 26 August 2019 9:35 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category

Submitted on Mon, 26/08/2019 - 09:34

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

James

**Last name**

Scott

**Name withheld**

No

## Info

**Email**

[tobys@mardon.com.au](mailto:tobys@mardon.com.au)

**Suburb/Town & Postcode**

Byron Bay 2481

**Submission**

I strongly appose the reduction to 180 days of STRA in the Byron Bay area due to the adverse impact it would have on the local working community.

A very high percentage of the local community in Byron Bay rely on income generated by STRA . Not only Shops and Restaurants, but small business and individuals that supply services that cater for visitors to the area year round.

Reducing the number of nights would mean " Hosts" would condense their allotted number of nights in peak Summer months for a higher yield thus creating a low Winter season with much lower income for the locals. Many of these Businesses may not survive these periods of low income. Businesses in the area would struggle with the proposed new legislation.

INSTEAD of reducing the number of nights suggestions include;

- i. A compulsory & regulated register of STRA premises like the Holiday Letting Organization (HLO) in Byron Bay.
- ii. Strict anti social behavior & noise requirements with deregulation or "Time out" repercussions for repeat offenders.
- iii. Council Fire Safety requirements with an annual inspection certificate to stay on the STRA register.

The local councils need a percentage of income generated by STRA to maintain Roads and amenities.

Suggestions include;

- iv. STRA registration fee.
- v. A Bed Tax. This system is very successful in other parts of the world with similar issues. The Tax is collected and distributed by the Booking platforms and out of the hands of hosts. Most Booking platform already use this method.

Implementing the above suggestions have already worked in other parts of the world without reducing the incomes of local residents and their businesses.

**I agree to the above statement**

Yes

**From:** James Sutton <jj.sutton@live.com>  
**Sent:** Wednesday, 11 September 2019 2:20 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

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Thank you for reading my submission.

Regards,  
James Sutton  
11 Peppermint Dr  
Springvale, Nsw 2650

# **JAN BARHAM**

## **PO Box 561 Byron Bay 2481**

Former Byron Shire Councillor (1999-2012) , Former Byron Shire Mayor (2004-2012)  
Former NSW MLC (2011-201)

10<sup>th</sup> September, 2019

### **Submission opposing Draft *State Environmental Planning Policy (Short-term Rental Accommodation) 2019***

**I strongly oppose this proposed Draft SEPP and if it or any version of it is adopted, I urge the NSW Government to exempt Byron Shire from the SEPP and allow council to determine what is acceptable for this community.**

As a long term Byron Shire resident and former elected representative I have knowledge and evidence of the evolution of the use of residential dwellings for the commercial use of short term tourism rental and it's unsustainable impacts. Over many years, the Byron Shire Council sought to define and regulate the use but was thwarted by government.

As a supporter of tourism and for a period of two years a representative on the regional Tourism Board, I continue to raise concerns about the impact of this activity on the resident community of the shire , the council and the approved and regulated tourism industry. I have also continued to raise the contradiction that exists with the State Government's demands on this shire to meet population and dwelling increases whilst allowing this activity to continue.

Currently, there are over 2,500 entire houses being used for Airbnb, this equates to approximately 6,000 residents displaced from our community. The 2016-2036 NC Regional Plan, Byron Shire Council is required to deliver 3,150 new dwellings to meet the expected population growth. Under the current situation and with the proposed SEPP there is no guarantee that much of this increased and unsustainable development requirement will end up as further short term rental accommodation. This is a reckless imposition on a community that is already under stress from the impact of tourism and housing unaffordability and unavailability.

The lack of available rental housing stock and the unaffordability is having dramatic impacts on our community. We are losing social capital and amenity in our neighbourhoods and have been financially and socially disadvantaged by the activity. It is also a planning contradiction that the use of approved residential dwellings in zones that prohibit tourism in the zoning is allowed to continue.

**I urge the Government to allow Byron Shire to be exempt from the proposed SEPP and allow the council to determine what is acceptable for this shire.**

It should not be overlooked that Byron Shire is a tourism icon that the State and Commonwealth government continue to promote as a tourism destination without



regard for the impacts on the community, commercial tourism operators and the council of this unregulated activity. But what is proposed is unacceptable for Byron Shire. With a shire wide population of approximately 30,000, there are over 2 million visitors each year. There is already unacceptable pressures from impacts of tourism on the environment, community and infrastructure.

During my time in Parliament I was a committee member on an inquiry that investigated the 'Impacts of tourism on local communities'. It was clear in the report that the use of residential properties for short term visitor use is unlawful. There was substantial evidence from communities of the negative impact of this use and there is case law <sup>1</sup>that supports the unlawful nature of the use and the impacts.

It is unacceptable that the State Government is not taking into account the impacts and responses that experienced around the world. The use of residential properties for short term visitor accommodation has been challenged and opposed in many destinations including Barcelona, Berlin, New York and San Francisco.

<https://www.cntraveler.com/galleries/2016-06-22/places-with-strict-airbnb-laws>

It is irresponsible for the State Government to allow the demands of the short term letting industry override it's responsibility to the citizens of the state to protect their right to housing and amenity.

The proposed SEPP places a cap on days allowed for letting where the host is not present. This is unacceptable. The only premises for this use should be where there are permanent residents who rent out a room/s. **Entire homes should not be allowed to operate as short term rental accommodation.** The use equates to a motel but without the required 'service' that is a component of the tourism industry and the regulation and payment of fees to councils for the commercial use.

I am aware that Byron Shire was promised a 90 day limit to the permissibility of the use during the recent state election. If this is a commitment the government is willing to honour, it should also allow the right to define where it is allowed.

It is a responsibility of the State under planning laws to ensure the rights of residents but this use of homes erodes those rights and denies the community the basic right of living in a neighbourhood and enjoying the amenity that residential zones are meant to deliver.

---

• <sup>1</sup> NSW Land and Environment Court case law - definitions of "residential accommodation", "residential building", "residential flat building", "domicile" and "flats", and concluded that there must be "an element of permanence or residence for a considerable time, or having the character of a person's settled or usual abode" in order to constitute "residential buildings"; relying particularly on *North Sydney Municipal Council v Sydney Serviced Apartments Pty Ltd* (1990)21 NSWLR 532 and *Derring Lane Pty Ltd v Port Phillip City Council* (No 2) (1999) 108 LGERA 129.

In Byron Shire there are increasing pressures on infrastructure and amenity and these are only able to be addressed with comprehensive planning laws that consider all impacts and respect the rights of residents.

It appears that there is a loophole in the SEPP that a booking for 21 or more consecutive days when a host is not present will not count towards the cap limit of days allowed. This is open to being misused and presents an unacceptable position and should be rejected from the SEPP.

The concept of an industry led register is also unacceptable. If this activity (STRA) is proposed to be permitted then it should be regulated by local government and subjected to controls defined by councils. Unfortunately, the industry has proven that it's interests have priority over the interests of neighbours. It is local governments' role to protect the interests of residents and that should be retained as for any other development activity.

**I respectfully urge the NSW Government to allow Byron Shire to be exempt from the proposed SEPP and allow the council to determine what is acceptable for this shire in relation to the protection of our community neighbourhoods and the appropriate regulation and approval system for Short Term Rental Accommodation.**

I strongly oppose the ***Draft State Environmental Planning Policy (Short-term Rental Accommodation) 2019*** proposal as currently presented and particularly for Byron Shire.

Yours sincerely,

Jan Barham

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 5:44 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

Submitted on Wed, 11/09/2019 - 17:42

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Jan

**Last name**

Barham

**Name withheld**

No

## Info

**Email**

[janbarham@bigpond.com](mailto:janbarham@bigpond.com)

**Suburb/Town & Postcode**

Byron Bay 2481

**Submission file**

[short-term-rental-accommodation-sepp---jan-barham-sept-2019.docx](#)

**Submission**

I oppose the Draft Short Term Rental Accomodation SEPP.

I may have sent the wrong / incomplete submission file previously, if you could please consider this my submission.

regards

Jan Barham

**I agree to the above statement**

Yes

**From:** Jan Beacham <jan.beacham@live.com.au>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

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I host a couple of times a year on Airbnb because...

It's an income stream to help us pay the mortgage and the bills.

It's also good for the Manly community as I bring in tourists, recommend my favourite cafes, restaurants and shops which are all local small businesses (that an ordinary tourist may not get to know and only see the large national and global chains) - so the local economy gets a boost as well

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

#### STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people like me who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts like me who share their home for only a few weeks a year, this is a significant barrier and will make hosting uneconomical.

For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive for me as well when I want to go on holiday myself and may drive me off shore.

#### Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Jan Beacham  
31 Arthur St  
Fairlight, Nsw 2094

**From:** Jan Stubbs <janstubbs49@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because my rental property in South West Rocks doesn't get booked enough through the local agent (we use both Airbnb & agent). We have a property in Sydney which we can't use personally on a regular basis so we do a little Airbnb renting to help with costs- the managing agent is aware of this situation.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

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Thank you for reading my submission.

Regards,  
Jan Stubbs  
163 Dondingalong Rd  
Dondingalong, Nsw 2440



**From:** Jane H Bare <janehbare@icloud.com>  
**Sent:** Wednesday, 21 August 2019 11:17 AM  
**To:** DPE PS STHL Mailbox  
**Cc:** abare@y7mail.com  
**Subject:** Re: Holiday rental regulations for NSW

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category, sent

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens on our operations.

As responsible operators, we strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

As holiday rentals like ours become more important to the tourism economy, it's our strong belief the NSW Government should build a regulatory solution that ensures the sector can reach its economic potential.

Thank you reading our submission.

Kind regards

Jane and Andrew Baré  
Owners  
Madison Park, Roberston, NSW 2577  
0404 856162

**From:** Jane Crichton <janecrichton2@bigpond.com>  
**Sent:** Wednesday, 11 September 2019 2:16 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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Thank you for reading my submission.

Regards,  
Jane Crichton  
16 Bolton St  
Wagga Wagga, Nsw 2650

**From:** Jane Geyle <coora1462@yahoo.com.au>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because I enjoy providing a beautiful homely space for visitors to enjoy.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

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Thank you for reading my submission.

Regards,  
Jane Geyle  
36-38 Jarrett St  
Coffs Harbour, Nsw 2450

**From:** Jane Leacey <janeleacey@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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Thank you for reading my submission.

Regards,  
Jane Leacey  
44 Armstrong St  
Suffolk Park, Nsw 2481

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Tuesday, 10 September 2019 5:32 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Rob submission, recorded in DPIE subs register, Purple category

Submitted on Tue, 10/09/2019 - 17:32

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Jane Margaret

**Last name**

Lymer

**Name withheld**

No

## Info

**Email**

[jlymer@uow.edu.au](mailto:jlymer@uow.edu.au)

**Suburb/Town & Postcode**

Mangerton

**Submission**

I own a STRA property in Currarong NSW 2540 and wish to make two points



1. I am deeply concerned about the proposed fire safety standard which will not permit STRA for properties with BALs greater than 40. Currarong is a tiny holiday village nestled between the sea and the bush that is almost totally reliant on holiday rental income and from what I can discern around one third of the rental properties could meet a BAL rating of 40 or greater with a large number of BAL 29 rentals needing to upgrade equipment. Areas like ours are at risk of fire - not just these selective houses but the entire community so to single out some houses above others in a small community surrounded by bush makes little sense. A fire, should it occur, would not do so.

Also, Currarong may not be an isolated case. The entire Shoalhaven region relies heavily on tourism (especially areas around Currarong, Callala Beach, Kangaroo Valley and Berry) and in many cases the attraction of STRA properties in this region is their small community feel along with their proximity to the bush and/or beaches that are surrounded by bush and where guests get to enjoy visits from the native wildlife in their backyards.

I would ask that areas like this be assessed differently to city areas to ensure that both owners and holiday makers are able to continue to enjoy spending time in close proximity to nature while also ensuring measure are put in place to ensure the safety of these communities as a whole, rather than targeting individual properties.

2. I would ask that existing dwellings be grandfathered. My husband and I are in our 60s and our STRA property was purchased as part of a self-funding retirement plan. I know that at least in our area we are not alone. Many of the properties in Currarong, and in general I am sure, are used as retirement income or future retirement income. Should this legislation come into force I am fearful of the impact this will have not only on our potential income but also on the value of our property. Should holiday villages such as Currarong become unattractive to investors as a result of this legislation then the property market will be adversely affected.

**I agree to the above statement**

Yes

**From:** Jane Tamone <jane@mediabrandaid.com>  
**Sent:** Wednesday, 11 September 2019 2:22 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

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Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

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## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Jane Tamone  
285 Miller St  
Cammeray, Nsw 2062

**From:** janelle garth <jrgarth@yahoo.com.au>  
**Sent:** Saturday, 7 September 2019 9:06 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday Homes are Generations Old

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Minister,

Please do not destroy the holiday home industry for Australians.

Holiday home accommodation is acutely unique in what it offers, and is extremely important for meeting the ranging needs of the community, and supports community and family wellbeing.

It offers 'affordable' and 'self contained' accommodation for large families, multiple families, generations of the same family, and social groups.

No other forms of accommodation offers this ability for families and friends to stay together, connecting people, which is proven to be important for social and mental health and general wellbeing.

Our holiday home is utilised by many people for these reasons. Many guests travel for sporting competitions, social and community events, as well as holidays, and enjoy accommodation where the whole family or group can stay together.

We oppose night limits and maximum per room restrictions.

These restrictions would mean we could no longer offer our home for holiday accommodation.

After 15 years being a holiday home, in order to maintain our livelihood, the property would be converted to a full time rental. We would not be the only ones forced to do this to pay the mortgage.

This would be tragic to the tourism industry as well as for the community service we provide.

Family holidays in a holiday home rental accommodation have created lifelong special cherished memories for many Australians like me and my family, for many generations.

I urge you to consider carefully the importance of holiday homes as a vital accommodation option to the community, and do not impose restrictions which would destroy this industry.

**From:** Janelle Noble-Jerks <janellenoblejerks@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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Thank you for reading my submission.

Regards,  
Janelle Noble-Jerks  
New Brighton Rd  
, Nsw 2483

**From:** Janene Ellis <ellis15@iprimus.com.au>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because... I have a beautiful house with much spare space and as I am now retired, I wish to still make some income so I don't have to go through all the ridiculous hurdles to receive aged pension. I love to host and look after my guests personally - something lacking in other hotel accommodation. I offer far more quality and value for money. I have all safety issues covered.

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I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Janene Ellis  
532 Nagle Rd  
Lavington, Nsw 2641

**From:** Janene Hochmuth <jali2005office@yahoo.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism. Living in a country area it is difficult to come up with the supplementary income that can assist us as we age. It is a retirement plan for a lot of people which ultimately will take the burden off the pension system.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing

- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

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Thank you for reading my submission.

Regards,  
Janene Hochmuth  
171 Gladstone St  
Mudgee, Nsw 2850

**From:** Janene larence <janene.larence@yahoo.com.au>  
**Sent:** Tuesday, 10 September 2019 8:06 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** recorded and not sent to DCS, recorded in DPIE subs register

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

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Thank you for reading my submission.

Regards,  
Janene Iarance  
2 Yarra Pl  
Wadalba, Nsw 2259

**From:** Janet Beckingsale <jpmaren80@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

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Thank you for reading my submission.

Regards,  
Janet Beckingsale  
3 Hawke St  
Tuncurry, Nsw 2428

**From:** Janet Nguyen <nguyenjanet@mac.com>  
**Sent:** Wednesday, 11 September 2019 2:16 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

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I host on Airbnb because...

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Thank you for reading my submission.

Regards,  
Janet Nguyen  
19 Griffiths St  
Fairlight, Nsw 2094

**From:** no-reply@planning.nsw.gov.au on behalf of Department of Planning,  
Industry and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Thursday, 15 August 2019 4:50 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Cc:** DPE PS ePlanning Mailbox  
**Subject:** Have your say on Short Term Rental Accommodation

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category

Submitted on Thu, 15/08/2019 - 16:49

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Janet

**Last name**

Ryan

**Name withheld**

No

## Info

**Email**

[janjohnr@bigpond.com](mailto:janjohnr@bigpond.com)

**Suburb/Town & Postcode**

Abbotsford 2046

**Submission**

I am writing in regard to short term letting, airbnb. My husband & I live in an apartment complex We firmly believe that STL, airbnb, should not be foisted on apartment residents when it is not wanted. If the Owners Corp have gone to the expense & trouble of having a by-law that prohibits same, then it is incomprehensible to even suggest that it can be overturned without another bylaw with majority agreement or ignored. Our O.C has had this special bylaw in place for over 12 months (100% support) & now residents are very concerned that some authority who doesn't even live here, could even consider forcing their wishes on us. By all means, allow those apartments who want it, & have a majority in agreement, go ahead. But a lot of us have spent a lot of money selecting a quiet residential block to call home.

I understand that airbnb is causing havoc in many overseas countries & in New York, the host has to be present.

**I agree to the above statement**

Yes

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This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it immediately.

Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the NSW Office of Environment and Heritage.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

**From:** Janette Nilsen <labomshack@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:20 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

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Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Janette Nilsen  
49 McGee Ave  
Wamberal, Nsw 2260

**From:** Janice Challinor <jchallinor3@bigpond.com>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it supplements my retirement income and allows my partner and I to travel and live a better life than we could otherwise do on limited retirement incomes.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

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Thank you for reading my submission.

Regards,  
Janice Challinor  
160 Glebe Point Rd  
Glebe, Nsw 2037

**From:** Janice mclay <mclayjanice@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:22 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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I host on Airbnb because...

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Thank you for reading my submission.

Regards,  
Janice mcLay  
22 Roberts St  
Narrandera, Nsw 2700

**From:** Janice Morrell <janice3morrell@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

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Thank you for reading my submission.

Regards,  
Janice Morrell  
8 Lurline St  
Wentworth Falls, Nsw 2782

**From:** Janiece Elton <fannyadamsjrp@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

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I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Janiece Elton  
6 Island View St  
Emerald Beach, Nsw 2456

**From:** Janiece Fanny <fannyadamsjrp@gmail.com>  
**Sent:** Thursday, 5 September 2019 9:58 AM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

**Categories:** Purple category

Dear Minister, Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry. As a result, regulation for our sector should avoid unnecessary burdens on our operations. As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

**From:** Janita Abra <janitaabra4@outlook.co>  
**Sent:** Wednesday, 11 September 2019 2:22 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Janita Abra  
222 Pacific Hwy  
Crows Nest, Nsw 2065



**From:** robertwiggins4@bigpond.com  
**Sent:** Saturday, 17 August 2019 4:04 AM  
**To:** DPE PS STHL Mailbox  
**Subject:** Re: Holiday rental regulations for NSW

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

**As a result, regulation for our sector should avoid unnecessary burdens on our operations.**

As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

As holiday rentals like mine become more important to the tourism economy, it's my strong belief the NSW Government should build a regulatory solution that ensures the sector can reach its economic potential.

Thank you reading my submission.

Kind regards,

Jann Wiggins

**From:** Janniene McDonald <jannienemc@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

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I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

#### Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

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- Mandate smoke alarms – either battery operated or hard-wired
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I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Janniene McDonald  
Po Box 290 Dorrigo  
Dorrigo, Nsw 2453

**From:** Jas Gill <jasdeep.gill@live.com>  
**Sent:** Wednesday, 11 September 2019 2:23 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Rob submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I have listed my property and decided to host on Airbnb because it provides me with great flexibility in renting my property. I am able to earn a higher income from guests travelling from overseas through the airbnb platform when compared to the traditional long-term rental.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I have also placed many pamphlets and menus from the local cafes, restaurants and shops for my guests to view and consider so the small businesses get a boost from the guests staying at my property. Many guests decide to follow my suggestions and provide business to the local cafes and restaurants rather than purchasing groceries and cooking at home over a short stay as it is more convenient.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home through airbnb.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

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Thank you for reading my submission.

Regards,  
Jas Gill  
21 Highland Close  
Macquarie Links, Nsw 2565

**From:** Jason Snaddon <jason@jasonsnaddon.com>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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Thank you for reading my submission.

Regards,  
Jason Snaddon  
19 Hutchinson St  
St Peters, Nsw 2044

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Tuesday, 10 September 2019 6:37 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Tessa Submissions, recorded in DPIE subs register, Purple category

Submitted on Tue, 10/09/2019 - 06:28

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Jason

**Last name**

Trump

**Name withheld**

No

## Info

**Email**

[jason@trumpfamily.net](mailto:jason@trumpfamily.net)

**Suburb/Town & Postcode**

Sydney 2000



**Submission file**

[motion-amending-by-laws-residential-north-sp-66849.pdf](#)

**Submission**

I'm writing as an owner of a property at King Street Wharf, North Tower (SP66849) and also represent the views of the majority of owners as Chairman of the Owners Corporation, as evidenced through recent AGM and committee discussions related to STRA.

Our Strata Plan was established in 2001 after the construction of the King Street Wharf precinct, and from the time of construction had considered the importance of balancing the needs of a commercial retail, commercial offices, residential and service apartment hotel occupants. Whilst the OC structure is complex, there's a strong working relationship across all OCs.

Specific to North (SP66849) and South (SP66850), there are by-laws that were established at inception covering Short Term Rentals, and these were further refined on legal advice and passed by the AGM in 2019. A copy of the enacted By-Law is attached for your reference. We also wish to point out the limitation of STRA was a Development Approval condition for the development, noting the commercial operations of the Adina Apartments within the precinct.

As the NSW Government proceeded to enact changes to Laws related to STRA, there's been a theme of very limited or cursory consultation. Our local MP of the NSW Parliament, Hon. Alex Greenwich has made representations on this topic, and we wish to reinforce his position as outlined in his speeches to Parliament and submissions.

From a citizen's perspective, it's becoming abundantly clear that the NSW Government is bowing to lobbying by the STRA industry and neglecting the interests of the majority of residents in Strata Units like King Street Wharf. Your paper fails to acknowledge and appreciate the views and needs of our Owners and Residents.

In the case of my residential building (SP88849) we've experienced multiple negative impacts from STRA including:

- Security given transient guests. Current security arrangements in our building require all residents to be registered and issued electronic key access (with appropriate ID checking). STRA guests are not registered and we have no idea who is in our building.
- Damage to common property, including signage, furnishings, walls intentionally vandalised.
- Concern over security, including mailboxes and personal safety from transient guests
- Impact of noise from parties which have run beyond reasonable hours.
- Blocking of amenities – for example 'reserving' the pool chairs in such a manner as to block use by owners and long-term residents, even when not in use.
- Safety concerns on the use of the gym and fitness facilities from casual/unfamiliar users.
- Accelerated wear and tear in common areas.

Ultimately, I'll be PAYING MORE in my Strata Levies if we're forced into a situation where additional concierge services, security, maintenance works, utilities for common property is required due to a disproportionate occupancy of STRA due to our prime CBD location. This doesn't provide fairness to owner occupiers or owners of long-term tenancies.

The clause that "Where the host is not present, and the booking is for 21 or more consecutive days, the

booking will not count towards the above day thresholds.” Is a flagrant disregard for the intent of minimum lease periods (3 months in our Strata Plan) and gives owners the ability to operate a Commercial Enterprise for short term renting at Scale. Whilst your paper suggests such STRA rentals have less impact on the amenity of the building, I hold the position that such rentals should comply with a 3 month minimum period and be a formally lodged lease with Fair Trading, with appropriate bonds etc held in trust by the Government.

At the very least, By-Laws preventing STRA that have been appropriately passed by Owners Corporations should be grandfathered into any arrangements. In the case of SP66849 and SP66850, strengthened By-Laws were passed following Legal Counsel advise in 2019, and it’s expected these remain valid after Parliament approves any changes.

As a regular business traveller, I want to return to my home and be a part of a community. I did not invest to live in a “hotel” with transient guests. As it stands now, the NSW Government isn’t taking into account my rights for the peaceful enjoyment of my property, and the minimisation of my cost.

In short, we expect the right to continue to prohibit STRA in our development.

Sincerely,  
Jason Trump

Chairman, SP66849  
King Street Wharf, North Tower  
Sydney NSW 2000

**I agree to the above statement**  
Yes

### **SP 66849 – Residential North**

The owners corporation SPECIALLY RESOLVES pursuant to section 141 of the Strata Schemes Management Act 2015 to repeal existing special by-law 3 and to amend existing by-law 8.7 and to make additional by-laws 8.11 to 8.19 so that they read as follows:

- 8.7 In addition to its powers under the *Strata Schemes Management Act 2015*, the Owners Corporation may serve on an owner or occupier a written notice requiring the owner or occupier to provide to the Owners Corporation a tenancy notice pursuant to section 258 of the *Strata Schemes Management Act 2015* and a copy of any lease, sub-lease or assignment of a lease or sub-lease, and an owner or occupier who receives such a notice must provide the tenancy notice, lease, sub-lease or assignment within 14 days of receipt of the notice.

#### **Additional rules about occupation of your lot**

- 8.11 For the purpose of the Owners Corporation complying with by-law 8.4:
- (a) in addition to its powers under the *Strata Schemes Management Act 2015*, the Owners Corporation may require, by written notice, an owner to provide it with a statutory declaration that in the 12 month period immediately before the date of the notice, that at all times during that 12 month period, the lot was occupied by the owner as the owner's place of residence or by a tenant under a residential tenancy agreement as the tenant's place of residence; and
  - (b) within 14 days of receipt of the notice, the owner must provide the statutory declaration to the Owners Corporation.

#### **Occupancy limits**

- 8.12 Subject to section 137(3) of the *Strata Schemes Management Act 2015*, you must ensure that:
- (a) Your lot is not occupied by more than two adults per bedroom in your lot; and
  - (b) No more than two adults occupy any bedroom in your lot; and
  - (c) No bedroom in your lot contains more than two beds (excluding children's beds, cots or bassinets); and
  - (d) Your lot is not occupied by more persons than are allowed by law or any development consent applicable to Residential North under the *Environmental Planning & Assessment Act 1979*; and
  - (e) If you are an owner, you must take all reasonable steps to ensure that the occupiers of your lot comply with this by-law.

- 8.13 In by-law 8.12:

**"adults"** means any persons 18 years of age or older but does not include excluded adults;

**"bedroom"** means a room approved for use as a bedroom under, or indicated as a bedroom in any plans the subject of, a planning approval for the Strata Scheme;

**"excluded adults"** means (where all of the adults who reside in a lot are related to each other) any adults who are related to each other;

**"related to each other"** means related to each other within the meaning of clause 36 of the *Strata Schemes Management Regulation 2016*.

#### **Prohibition on illegal uses and unlawful short term accommodation**

- 8.13 You must ensure that your lot is not used for any purpose (including but not limited to a business, activity or industry) that:
- (a) is prohibited by law, a restriction on use, or the LEP; or
  - (b) requires approval or authorisation of an authority including the Council or under any law or the LEP, without that approval or authorisation.
- 8.14 You must ensure that your lot is only used as a permanent dwelling or domicile unless you are lawfully able to use your lot for another purpose, or you obtain Council approval to use your lot for another purpose, in which case you may use your lot for that other purpose.
- 8.15 You must not use your lot, or allow your lot to be used, for unlawful short term accommodation.
- 8.16 You must take all reasonable steps to ensure that your lot is not used for unlawful short term accommodation.
- 8.17 You must ensure that your lot is not advertised or promoted for unlawful short term accommodation including on Airbnb or similar Internet website or for any use which is prohibited by this by-law.
- 8.18 If you lease or sub-lease your lot after this by-law 8.18 is registered, then you must ensure that the lease or the sub-lease contains:
- (a) a term prohibiting your tenant or sub-tenant using the lot for unlawful short term accommodation or for any use prohibited by this by-law; and
  - (b) a term prohibiting advertising or promoting the lot for unlawful short term accommodation including on Airbnb or similar Internet website.
- 8.19 In by-laws 8.13 to 8.18:

**“Council”** means City of Sydney Council and any successor;

**“LEP”** means the *Sydney Local Environmental Plan 2012* including any amendment of it and any planning instrument replacing it;

**“permissible short term accommodation”** means occupation of a lot, or part of a lot, by one or more persons temporarily, or for a period of less than three months, on a commercial basis that is permissible with the consent of the Council under the LEP or the *Environmental Planning & Assessment Act 1979*;

**“prohibited short term accommodation”** means occupation of a lot, or part of a lot, by one or more persons temporarily, or for a period of less than three months, on a commercial basis that is prohibited under the LEP;

**“restriction on use”** means any restriction on use of land that is registered on the common property certificate of title for Residential North;

**“unlawful short term accommodation”** means permissible short term accommodation without the consent of the Council and prohibited short term accommodation.

## **Costs**

- 8.20 If an owner or occupier breaches any part of by-laws 8.1 to 8.19, then, in addition to any other rights the Owners Corporation may have:
- (a) the Owners Corporation may recover from the owner or occupier any fine or fee suffered or incurred by the Owners Corporation as a result of that breach; and

- (b) the Owners Corporation may recover from the owner or occupier its reasonable costs as determined by the strata committee in investigating, reporting and dealing with complaints, notices and remedial action arising from that breach; and
- (c) the Owners Corporation may recover from the owner or occupier its costs of enforcing any part of by-laws 8.1 to 8.19; and
- (d) the Owners Corporation may recover any amount due under this by-law as a debt.

**From:** Jason Williams <jaymoe@bigpond.net.au>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

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I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

#### Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
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I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Jason Williams  
27 Bradley Dr  
Harrington Park, Nsw 2567

I write to record my vehement objection to the amendment of the regulatory framework relating to Short Term Residential Accommodation to the extent that it is directed at restricting the ability of a strata plan to pass by-laws prohibiting “Air B-n-B” by providing that any such by-law be “*adopted by special resolution, with 75 per cent of votes supporting the proposal at a general meeting*” as set out in the Discussion Paper (Background Section)

We live in Milsons Point, a Sydney suburb with extremely high population density. Its public resources including on-street parking, open parkland and waste/litter management are strained. Our suburb has no requirement to house “FIFO” workers, a group whose need for accommodation appears to have been an important consideration underlying the policy.

The “special resolution” requirement would render it easier for owners to run apartments as private hotels in residential home unit buildings not approved for such commercial use. Such an operation can, and does interfere substantially with the quiet enjoyment of the occupation of other residents.

We have had such an experience in our strata block wherein a non-resident owner (the original developer of the property) made his penthouse apartment available and promoted its use for weekend “bucks’ parties” resulting in:

- Scattering of litter including cigarette butts in common areas and balconies of other apartments;
- Spillage of liquor in hallways and lifts;
- Excessive loud music and noise throughout the night;
- Visitation by strippers and sex workers to entertain the partygoers; and
- Provision to itinerants of access to secure car residents’ parking areas.

The codes of conduct to be observed in residential home unit buildings are regulated by the passage of by-laws under the legislation. It is entirely appropriate that they enable the residents to determine the manner in which their building may be used with consideration to the impact of such use upon their lives.

Like almost all others in our area our apartment block does not have the security, permanent cleaning and reception facilities required in the operation of a hotel business; the use to which the building could be put under the proposed framework.

In my submission, in a home unit block zoned residential it should be the ability of the owners’ corporation to pass by-laws *permitting* the use of apartments for STRA that should require a special resolution, with 75 per cent of votes supporting the proposal at a general meeting. The proposed framework is founded on the presumption owners of residential apartments should be allowed to operate a hotel in their apartments unless 75% of the other owners object. Such a presumption is abhorrent to the principal that an owner is entitled to the quiet enjoyment of his home.

Jay Anderson

1/3 Northcliff Street

Milsons Point 2061



**From:** no-reply@planning.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Thursday, 5 September 2019 9:06 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Purple category

Submitted on Thu, 05/09/2019 - 09:04

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Jay

**Last name**

Anderson

**Name withheld**

No

## Info

**Email**

[jayoa@bigpond.com](mailto:jayoa@bigpond.com)

**Suburb/Town & Postcode**

Milsons Point

**Submission file**

[air-bnb-objection.pdf](#)

## **Submission**

I write to record my vehement objection to the amendment of the regulatory framework relating to Short Term Residential Accommodation to the extent that it is directed at restricting the ability of a strata plan to pass by-laws prohibiting "Air B-n-B" by providing that any such by-law be "adopted by special resolution, with 75 per cent of votes supporting the proposal at a general meeting" as set out in the Discussion Paper (Background Section)

We live in Milsons Point, a Sydney suburb with extremely high population density. Its public resources including on-street parking, open parkland and waste/litter management are strained. Our suburb has no requirement to house "FIFO" workers, a group whose need for accommodation appears to have been an important consideration underlying the policy.

The "special resolution" requirement would render it easier for owners to run apartments as private hotels in residential home unit buildings not approved for such commercial use. Such an operation can, and does interfere substantially with the quiet enjoyment of the occupation of other residents.

We have had such an experience in our strata block wherein a non-resident owner (the original developer of the property) made his penthouse apartment available and promoted its use for weekend "bucks' parties" resulting in:

- Scattering of litter including cigarette butts in common areas and balconies of other apartments;
- Spillage of liquor in hallways and lifts;
- Excessive loud music and noise throughout the night;
- Visitation by strippers and sex workers to entertain the partygoers; and
- Provision to itinerants of access to secure car residents' parking areas.

The codes of conduct to be observed in residential home unit buildings are regulated by the passage of by-laws under the legislation. It is entirely appropriate that they enable the residents to determine the manner in which their building may be used with consideration to the impact of such use upon their lives.

Like almost all others in our area our apartment block does not have the security, permanent cleaning and reception facilities required in the operation of a hotel business; the use to which the building could be put under the proposed framework.

In my submission, in a home unit block zoned residential it should be the ability of the owners' corporation to pass by-laws permitting the use of apartments for STRA that should require a special resolution, with 75 per cent of votes supporting the proposal at a general meeting. The proposed framework is founded on the presumption owners of residential apartments should be allowed to operate a hotel in their apartments unless 75% of the other owners object. Such a presumption is abhorrent to the principal that an owner is entitled to the quiet enjoyment of his home.

Jay Anderson  
1/3 Northcliff Street  
Milsons Point 2061

## **I agree to the above statement**

Yes

**From:** Jay Novak <jaynovak@internode.on.net>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because I am a senior citizen who does not draw benefits. I am able to support myself from the income derived from Airbnb, hosting within my home. Not only do I derive an income but the experience adds to the quality of my life, introducing a wide range of people to my life. The World comes to me.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

#### STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

#### Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Jay Novak  
225 Wilson St  
Newtown, NSW 2042

**From:** Jayme Pearce <cabernet000@yahoo.com>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

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#### Environmental Planning and Assessment (STRA) Regulation 2019

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Jayme Pearce  
19 Coral Ct  
Byron Bay, Nsw 2481

**From:** Jean McDonald <jeaniemarymcdonald@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I want to provide my feedback on the Government's proposed regulations.

I host on Airbnb for the following reasons:

1. As retirees it provides just enough income to prevent us from having to go on the government pension.
2. There are no hotels or motels in our immediate area and we provide accommodation for a local tertiary institution, local wedding venues, our immediate community and for overseas visitors who wish to be central to the Central Coast, the Watagans, various beaches, Lake Macquarie, the Hunter and Newcastle.
4. People travelling from either north or south from centres such as Brisbane/Melbourne/Canberra/Woollongong etc like to have a stop-over mid-way in the country rather than the city and choose our location as a half way spot and perhaps because it is more affordable.
3. As retirees it also serves us as a hobby as we enjoy interaction with travellers and love to show, and tell them, what is available in our area.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will

end up making holidays across NSW more expensive.

#### Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW

Government streamlining safety regulations which:

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- Mandate smoke alarms – either battery operated or hard-wired
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#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Jean McDonald  
10 Harmon Dr  
Cooranbong, Nsw 2265



**From:** no-reply@planning.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Tuesday, 20 August 2019 1:59 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category

Submitted on Tue, 20/08/2019 - 13:59

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

**First name**

Jean-Claude

**Last name**

Branch

**Name withheld**

No

## Info

**Email**

[jcbranch@emeraldcityhotels.com](mailto:jcbranch@emeraldcityhotels.com)

**Suburb/Town & Postcode**

2061

**Submission**

I am submitting as both a Licenced accomodation (hotels and Guest houses 3 hotels and 140 rooms) operator and Airbnb host (8 apartments). I have seen the benefits and pitfalls of both platforms. One area that I think needs further consideration is the 180 day limit. The problem with this is it's extremely difficult to police. One could host for 180 days on airbnb and then 180 days on another platform with similar but slightly different listings and in buildings with multiple units it's extremely difficult to control and police (very time consuming and not partially beneficial to anyone).

I would suggest instead of a blanket cap, that measures are put in place where a strata could if desired place their own rules. but if there is no strata or the strata agrees, then a system to register accommodation and require the hosted accomodation to comply with similar standards such as fire and accessibility that a hotel must comply with. Hence assisting to level the field of competition.

**I agree to the above statement**

Yes

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This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it immediately.

Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the NSW Office of Environment and Heritage.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

**From:** Jeanette Merritt <byronbaytours@bigpond.com>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Jeanette Merritt  
20 Browning St  
Byron Bay, Nsw 2481

**From:** Jeanie Wylie <jeaniewylie@hotmail.com>  
**Sent:** Monday, 9 September 2019 6:47 AM  
**To:** DPE PS STHL Mailbox  
**Subject:** Re: Holiday rental regulations for NSW

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens on our operations.

As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

As holiday rentals like mine become more important to the tourism economy, it's my strong belief the NSW Government should build a regulatory solution that ensures the sector can reach its economic potential.

Thank you reading my submission.

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Friday, 6 September 2019 8:50 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** recorded in DPIE subs register, Purple category

Submitted on Fri, 06/09/2019 - 20:50

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Jeff

**Last name**

Norman

**Name withheld**

No

## Info

**Email**

[jeff.norman41@gmail.com](mailto:jeff.norman41@gmail.com)

**Suburb/Town & Postcode**

Jindabyne

**Submission**

Hi

I am a practising town planner with over 20 years of experience.

I own a 2 bedroom town house in the Snowy Mountains - Jindabyne. My property has development consent to be used as a holiday letting. There are prescribed conditions that I am required to comply with.

I have owned this property for over 20 years and there have been no issues. I regularly lease my property all year round for the purposes of holiday lettings.

I am concerned with the draft changes and in particular unnecessary and unreasonable imposition of additional fire safety requirements on my premises. The use is not dissimilar to that of a dwelling. The costs may be prohibitive, and if it is, I will cease my landuse and will switch it to a residential tenancy agreement. I believe NSW Planning is implementing these changes in response to issues raised by the Hotel and Motel industry. This is unfair as my building is not a 700 hundred bed resort where of cause more stringent fire safety measures are required.

There should also be exemptions applied to existing use provisions where any new measures are not retrospectively applied as it is in other building standards such as swimming pool barrier safety requirements etc.

I am also concerned that the proposal includes possible barring as the owner of a property is responsible for the behaviour of the guest. This is completely unreasonable as I live in Sydney and how can I be held responsible if a guest is violent towards a neighbour? This is a criminal act which should be treated as such by a police investigation. Property owners cannot review the character of potential guests as there is privacy legislation protecting all individuals. Hotels and motels would not be held to account if one of their guests were violent towards others, other than their responsibility to report any incident to the police.

I am happy to discuss further and can be contacted on 0412971075

Regards

Jeff

**I agree to the above statement**

Yes

**From:** no-reply@planning.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Wednesday, 21 August 2019 3:30 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category

Submitted on Wed, 21/08/2019 - 15:29

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Jeff

**Last name**

Smith

**Name withheld**

No

## Info

**Email**

[jeff@bwiloans.com.au](mailto:jeff@bwiloans.com.au)

**Suburb/Town & Postcode**

Kingscliff



**Submission**

I'd like to put my support behind the ability to allow Short Term residential holiday letting. I believe it allows communities to utilise existing residential housing infrastructure to accommodate peak period overflows in many holiday destinations and reduces the need for additional large scale development which have a far greater impact on the environmental considerations and may be well below capacity for extended periods each year. As a resident and small business owner in a holiday destination, I see significant benefits for both the resident and business operator.

**I agree to the above statement**

Yes

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This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it immediately.

Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the NSW Office of Environment and Heritage.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 11:05 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Rob submission 3.0, non Air BNB run

Submitted on Wed, 11/09/2019 - 23:05

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Jeffrey

**Last name**

Pilon

**Name withheld**

No

## Info

**Email**

[jessie@pilonengineering](mailto:jessie@pilonengineering)

**Suburb/Town & Postcode**

Randwick

**Submission**

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it provides flexible way for me to live in our family property while studying in Sydney and travelling back to country areas to work in the family business it has made this effective way both use the property and be able to rent while away for work I only have respectful people stay in our apartment and never had any issues

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems. I Don't agree with the 180 day ruling in Sydney areas as I don't see this fair, we are not going to unfurnish our property to rent out if we go over the limit while having our property for own use and rental at the same time, we would not want to rent full time as the property has been set up nicely for us to use and the short term guest, how is this going to effect the rental market which is already in a bad state of affairs with properties staying empty for many months affecting people trying to pay high mortgages, Real estates are also stating they cant ren furnished apartments?

Thank you for reading my submission.

**I agree to the above statement**

Yes

**From:** Jem Ellis <jemsplacetostay@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it provides me an income so as I can be a stay at home mum to my three small children. The hours are flexible and I host whenever it is convenient for me and my family.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

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I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired

- Require evacuation or emergency plans and guest education

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Jem Ellis  
568 Koorringal Rd  
Koorringal, Nsw 2650

**From:** Jenni Pendergast <jp@alpha.net.au>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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Thank you for reading my submission.

Regards,  
Jenni Pendergast  
25 Surf St  
Long Jetty, Nsw 2261



**From:** Jenni Richards <jennirichards@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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Thank you for reading my submission.

Regards,  
Jenni Richards  
318 Molesworth St  
East Lismore, Nsw 2480

**From:** Jennie Cass <jenniecass@bigpond.com>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it means I can be independent and pay my own way in life as well as contributing to the economy. I am a 60 year old widow and without it I would be just another unemployment statistic.

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Thank you for reading my submission.

Regards,  
Jennie Cass  
15 Mitchell St  
South West Rocks, Nsw 2431

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 11:00 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Rob submission 3.0, non Air BNB run

Submitted on Wed, 11/09/2019 - 22:59

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Jennifer

**Last name**

Bohn

**Name withheld**

No

## Info

**Email**

[jenniferbohn74@gmail.com](mailto:jenniferbohn74@gmail.com)

**Suburb/Town & Postcode**

Mount Victoria / 2786

**Submission**

The proposal that rental properties in the Blue Mountains should be treated the same way as residential / suburban areas is certain to impact negatively on residents and future of the area.

The Blue Mountains - especially the towns in the upper mountains - rely heavily on tourism for the local economies. The advancements that have been made in recent times to roads and local infrastructure support the region and can only be seen as positive. The area does, however, rely heavily on short-term rental availability. To limit that will reverse any gains made.

It must be considered that most homes in the Blue Mountains are in bush fire prone surrounds. The very thing that causes the risk is what makes it an attractive destination for holiday makers - the bush. With the majority of homes being older and not compliant to BAL29+ conditions, the pool of available accommodation will be shrunk - as will the number of visitors to our towns. The result - businesses losing trade and a town shutting down. Then, of course, there are the homes that do comply with the requirements of the bushfire code. Why limit the number of days for rental availability. Less days available on the market will make no difference to the safety or compliance of a house in the event of fire.

I hope that you will reconsider the proposal with the benefit and protection of local economies and also common sense in mind.

**I agree to the above statement**

Yes

**From:** jennifer busch <oshyabee@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:21 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

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#### Environmental Planning and Assessment (STRA) Regulation 2019

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Thank you for reading my submission.

Regards,  
jennifer busch  
538 Fishermans Reach Rd  
Fishermans Reach, Nsw 2441



**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Monday, 9 September 2019 10:08 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Submitted on Mon, 09/09/2019 - 22:07

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Jennifer

**Last name**

Day

**Name withheld**

No

## Info

**Email**

[jday1382@gmail.com](mailto:jday1382@gmail.com)

**Suburb/Town & Postcode**

Potts Point

**Submission**

This practice of turning your property/home into a short term holiday rental is testament to the greed

and lack of equality in our society. Less that a third of units in our strata building are owner occupied . Since this practice began our building is full of transient strangers who have no concern for the building or needs of occupants. The absent owners line their pockets while the owner occupiers suffer. These are the people who care for the building; it's our home, we don't want to have different neighbours every week, it adds to our expenses for security, repairs and maintenance, let alone extra noise. Please give consideration to those who can afford one home and want a some quality of life not those who are making a profit.

**I agree to the above statement**

Yes

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 2:34 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

Submitted on Wed, 11/09/2019 - 14:34

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Jennifer

**Last name**

Gray

**Name withheld**

No

## Info

**Email**

[jennygray@exemail.com.au](mailto:jennygray@exemail.com.au)

**Suburb/Town & Postcode**

Myocum, 2481

**Submission**

The proposed regulations for short term holiday letting are entirely inadequate.

I live in the Byron Shire where there are 3,306 properties listed on Air BnB, this is a rise of 200% in three years.

Of these, 80% are for whole homes. This shows that the idea that Air BnB is for spare room letting is a

fiction.

In this shire Air BnB has destroyed the permanent rental market and has pushed up property prices.

The lives of local residents who own their houses are being disrupted by suburban party houses.

Byron Shire was promised a cap of 90 days but there is no evidence of this.

Short term holiday letting should only be allowed if there is a permanently residing house holder.

The renting out of whole houses should be regulated by local councils.

**I agree to the above statement**

Yes

**From:** Jennifer Johnson <jenn.niff11@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because we have 6 expensive teenagers and only have them every other week because we are a split family so need a house big enough but have 5 empty rooms on opposite weeks. Our area have very few hotel options so it is ideal for visitors. We have plenty of onsite parking so our street is not impacted. When we go on holidays it helps fund the expense of our family of 8. Without Airbnb we are less likely to be able to afford these special family moments.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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Thank you for reading my submission.

Regards,  
Jennifer Johnson  
64 Washington Ave  
Cromer, Nsw 2099

**From:** Jennifer kuek <barefootatcallala@bigpond.com>  
**Sent:** Wednesday, 11 September 2019 2:16 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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Thank you for reading my submission.

Regards,  
Jennifer kuek  
67 Quay Rd  
Callala Beach, Nsw 2540



**From:** Jennifer Marshall <jenmarshall73@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Jennifer Marshall  
50 Whale Beach Rd  
Avalon Beach, Nsw 2107

**From:** Jennifer Richter <jenrr@y7mail.com>  
**Sent:** Wednesday, 11 September 2019 2:16 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, non Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because... at 61 yrs I lost my job and have not been able to get another. Hosting guests in my home has been a godsend for me. I am also unable to receive any government assistance as I have a couple of rental properties which pay for themselves i.e. the rent I receive pays mortgage therefore am not eligible for the newstart payment, without Airbnb I would be literally up the creek without paddle. Apart from the financial rewards of airbnbing my home, I get a social benefits. Living alone, without the social engagement of a workplace each day, I love the interactions I have with of my guests who are from diverse nationalities, ages, and life stages. Apart from the above, I am expressing my creativity styling my home (spending in local businesses and have honed my housekeeping skills to perfection

Regards,  
Jennifer Richter  
4 Benjamin St  
Geneva, Nsw 2474

**From:** Jennifer Roberts <jaye@essenture.com.au>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

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Thank you for reading my submission.

Regards,  
Jennifer Roberts  
17 Hillcrest Ave  
Port Macquarie, Nsw 2444

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Tuesday, 10 September 2019 5:54 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Rob submission, recorded in DPIE subs register, Purple category

Submitted on Tue, 10/09/2019 - 17:53

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Jennifer

**Last name**

Schrader

**Name withheld**

No

## Info

**Email**

[bj.fisher@bigpond.com](mailto:bj.fisher@bigpond.com)

**Suburb/Town & Postcode**

MOSMAN

**Submission**

I strongly object to any sort of legislation being passed that will allow short term letting in strata buildings. I believe it is totally contrary to the rights of the people who own and live in the development

as opposed to absentee owners who, on the whole, do not seem to care what effect their fly-in/fly-out occupiers have in relation to the generation of noise, rubbish disposal, parties and the wear and tear of the facilities of the strata premises.

**I agree to the above statement**

Yes

**From:** Jennifer Tesar <ruddo2@outlook.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

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Thank you for reading my submission.

Regards,  
Jennifer Tesar  
22 Coonawarra Ct  
Yamba, Nsw 2464

**From:** jennifer wright <jswright11@yahoo.com.au>  
**Sent:** Wednesday, 11 September 2019 2:21 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I have recently decided to host on Airbnb because it permits me to rent my cottage to guests who are looking for a pleasant home to stay will visiting Goulburn. I appreciate knowing the guests coming have been recommended. I believe staying in a home is more personal and relaxing than staying in commercial accommodation.

Also, hosting through Airbnb allows me to closely monitor my small rental property. I had previously rented my cottage to long term tenants who damaged the property extensively and failed to pay rent for an extended time. I have also chosen to host through Airbnb as a transparent system for short term rental. While I am working, I can organise my calendar to accept guests when it suits my work commitments.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

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Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home

before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

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Thank you for reading my submission.

Regards,  
jennifer wright  
144 Cowper St  
Goulburn, Nsw 2580

**From:** Jenny Alexander <jennyalexander@optusnet.com.au>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

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Thank you for reading my submission.

Regards,  
Jenny Alexander  
19 Birdwood Ave  
Collaroy, Nsw 2097

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Monday, 9 September 2019 1:56 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** recorded in DPIE subs register, Purple category

Submitted on Mon, 09/09/2019 - 13:56

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

JENNY

**Last name**

ANDREW

**Name withheld**

No

## Info

**Email**

[jenny@tweedcoastmarine.com.au](mailto:jenny@tweedcoastmarine.com.au)

**Suburb/Town & Postcode**

BRUNSWICK HEADS 2483

**Submission**

I am an owner of a property in Brunswick Heads in the Byron Shire which consists of 1 holiday apartment, situated in the CBD (commercial zoned). This holiday accommodation is actively managed by a local real estate agency. I have never had any formal complaints from neighbors but when there has been minor concerns then the real estate has handled it efficiently/effectively. Note Brunswick Heads has a small/limited range of accommodation options so need privately owned holiday apartments to provide a different/missing type of holiday accommodation as well as to cater to the high demand. Re: Demand - My property is running at a very high occupancy rate with majority of guests at my property being from Sydney, Brisbane & Gold Coast (we are only 60-90 min drive south of the latter two). Note Brunswick Heads has always been a 'holiday destination' - Historically, many holiday houses were built/owned by businessman from Lismore/Kyogle/Casino who regularly vacationed here along with many other local/regional families so tourism in town is not a new or developing situation - It's growth over recent years simply hasn't been planned for or managed by Local/State Government so a few anti-short term accommodation residents who shout the loudest are complaining & our 'Green' Council have bowed down to their scare campaign. Hence, I totally reject the Byron Shire Council's request for a special 90 day limit for short term accommodation. I actually also reject the NSW Government's 180 day limit. Instead, I support unlimited time restriction (i.e. allow 365 days) & registration of all private owned holiday accommodation who must abide by a sensible/reasonable code of conduct policy.

**I agree to the above statement**

Yes

**From:** Jenny Downing <jennydowning@hotmail.com>  
**Sent:** Thursday, 5 September 2019 2:25 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Minister, Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry. As a result, regulation for our sector should avoid unnecessary burdens on our operations. As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.



**From:** Jenny Downing <jennydowning@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:20 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

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Specifically, I want to comment on the following:

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#### Environmental Planning and Assessment (STRA) Regulation 2019

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Thank you for reading my submission.

Regards,  
Jenny Downing  
15 Brantwood St  
Sans Souci, Nsw 2219

**From:** Jenny Hein <jennyhein@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

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Thank you for reading my submission.

Regards,  
Jenny Hein  
12 Bluff Rd  
Emerald Beach, Nsw 2456

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 10:05 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** recorded in DPIE subs register

Submitted on Wed, 11/09/2019 - 10:03

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Jenny

**Last name**

King

**Name withheld**

No

## Info

**Email**

[jenny\\_r\\_king@hotmail.com](mailto:jenny_r_king@hotmail.com)

**Suburb/Town & Postcode**

Manyana 2539

**Submission file**

[stra-in-nsw\\_submission-september-2019.docx](#)

### **Submission**

What is the real objective of the regulatory framework that is being proposed by the NSW Government for Short Term Rental Accommodation in NSW?

Clearly there are multiple organisations with vested interests.

However, there is no representation on the committee for “everyday Mum and Dad” hosts.

There should be no annual cap on how many days an STRA property can be rented

The current proposal is to reduce this to 180 days ... what does this achieve?

Why should honest hosts with great reviews and with no complaints be penalised, based on how many days their property is rented?

Ban 1 night or 2 night stays for STRA properties to assist hotels / motels and stop “party houses”

This is more likely to stop so-called “party houses” rather than the proposed introduction of a 180 day annual cap.

Wouldn't it be better to ban 1 night or 2 night stays which also negatively impact the hotel / motel properties in both Sydney and regional NSW?

I do not own a 3, 4, 5 or 6 bedroom house. I own a 1 bedroom apartment where we have 1 or 2 guests come and stay ... hardly conducive to ongoing partying.

Bookings of  $\geq 7$  days should not contribute to the proposed annual cap

The updated proposal is 21 days. It would be far more realistic at 7 days. Who really travels for business for 3 weeks at a time?

The point of the exemption is that it “reflects feedback that longer bookings tend to have fewer amenity impacts and are key to support a mobile workforce”. An exemption of  $\geq 7$  days would still achieve the same outcome if they truly want to support a mobile workforce.

Registration of STRA properties should be for tracking complaints not number of days booked

The “3 strikes policy” has some merit. However the registration should be used to track complaints, not to measure how many days of bookings that a property has throughout the year.

The government should not have the ability to over-rule the Owners' Corporation if the OC of an apartment building is happy with STRA within the building

Some apartment buildings in Sydney are well suited to STRA as they were previously a hotel prior to the property being strata-titled, and lot owners are supportive of STRA and holiday makers staying within the building.

Why is there “nanny state” intervention where it is not needed?

Surely the government should not be able to dictate how my apartment operates?

Based on a 180 day cap, the inference is that “it is OK that my revenue is decreased significantly”?

I am retired and rely on the rental income that is generated by my apartment – is the government suggesting therefore that there will be compensation for my drop in income?

NSW, the “nanny state” ... not a good look!!

**I agree to the above statement**

Yes

## **What is the real objective of the regulatory framework that is being proposed by the NSW Government for Short Term Rental Accommodation in NSW?**

Clearly there are multiple organisations with vested interests.

However, there is no representation on the committee for “everyday Mum and Dad” hosts.

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## **Bookings of $\geq 7$ days should not contribute to the proposed annual cap**

The updated proposal is 21 days. It would be far more realistic at 7 days. Who really travels for business for 3 weeks at a time?

The point of the exemption is that it “reflects feedback that longer bookings tend to have fewer amenity impacts and are key to support a mobile workforce”. An exemption of  $\geq 7$  days would still achieve the same outcome if they truly want to support a mobile workforce.

## **Registration of STRA properties should be for tracking complaints not number of days booked**

The “3 strikes policy” has some merit. However the registration should be used to track complaints, not to measure how many days of bookings that a property has throughout the year.

## **The government should not have the ability to over-rule the Owners' Corporation if the OC of an apartment building is happy with STRA within the building**

Some apartment buildings in Sydney are well suited to STRA as they were previously a hotel prior to the property being strata-titled, and lot owners are supportive of STRA and holiday makers staying within the building.

Why is there “nanny state” intervention where it is not needed?

## **Surely the government should not be able to dictate how my apartment operates?**

Based on a 180 day cap, the inference is that “it is OK that my revenue is decreased significantly”?

I am retired and rely on the rental income that is generated by my apartment – is the government suggesting therefore that there will be compensation for my drop in income?

NSW, the “nanny state” ... not a good look!!

**From:** no-reply@planning.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Wednesday, 28 August 2019 12:14 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category

Submitted on Wed, 28/08/2019 - 12:12

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Jenny

**Last name**

Looi

**Name withheld**

No

## Info

**Email**

[jennylooileechoo@yahoo.com.sg](mailto:jennylooileechoo@yahoo.com.sg)

**Suburb/Town & Postcode**

Possum Creek/NSW 2479

**Submission file**



## Submission

Hi there,

I have read the documents and below is my feedback. But firstly, I would like to point out that having all these separate documents, issued by different departments, make for exasperating reading. When a final document is issued, I heartily recommend that all the requirements of a host be consolidated into 1 single document, to avoid any miscommunications/misunderstandings/gaps. Surely this cannot be so difficult?

1. My main gripe is the safety requirements for bushfire zones, as some properties like mine (which is rural residential R3) are classified as bushfire zone, but in reality it is too wet in this region (Byron hinterland) for fires; there hasn't been any for as long as anyone can remember! Years, decades, I mean. This means that there are probably many such affected properties, which penalises us for no good reasons. The worst thing is that the documents ask for fire hydrant to be installed within 60m of each dwelling. Whoever wrote this up must live in the city and has absolutely no idea of what this entails! As far as I am aware, there are no fire hydrants out in the country for miles! How can there be a requirement that would cost millions of dollars to implement??!! And what does reticulated water supply mean?? I think having access road and evacuation plan is sufficient, but definitely not the need for fire hydrant and reticulated water supply (whatever that means). I also recommend making this exempt for hosts who live on the property themselves. Please amend NSW State Environment Planning Policy STRA 2019 accordingly.

2. I agree to providing neighbours with host contact details except there must be a provision made for obnoxious cranky unreasonable neighbours who abuse such access. Probably best to just require email address to be provided, not telephone contact as one can imagine incessant calls at unreasonable hours from such unreasonable neighbours. The state should also retain the right to block email access if a neighbour proves to be consistently unreasonable and abusive, leading to unnecessary stress. There has to be a limit to rights to avoid abuse from aggressive unreasonable neighbours.

3. If public liability insurance is to be made compulsory, the state has to work with insurance companies to provide for such cover at a reasonable cost and to communicate clearly to hosts where they can buy such insurance. I have failed to find such insurance. Please do not fob off with "check with your insurer" statement. It is the state responsibility to enable easy access to such insurance if it is made compulsory; put some pressure on insurers to come up with reasonable solutions.

4. I think the "2 strikes within 2 years to become excluded" is an interesting idea, BUT have some concerns.

(i) "2 strikes within 2 years to become excluded" seems too aggressive; maybe "5 strikes within 2 years" is better, since there may be neighbours who are incessant unreasonable aggressive complainers who actually succeed to push their way through to the Commissioner/Secretary

(ii) I think a "fines" system will actually work better to get hosts to better select and manage their guests rather than a "2 strikes within 2 years to get excluded". Hosts are primarily in the hosting business to make money. Hosts would not like fines and responsible hosts would be ok with "fines" systems as long as it is reasonable and not crazy prohibitively costly (as people do rely on STRA for household income). Why not come up with a system of warnings and fines, like traffic warnings and fines? For example, first

2 warnings incur no fines, but 3rd incident gets a fine of \$100, 4 incident gets a fine of \$150, 5th incident gets a fine of \$200, 6th incident gets \$250, 7th incident and onwards gets \$300 fine. The onus will be on the complainant to get the evidence for the fine to be issued. This will help to deter frivolous and unreasonable complaints as well.

(iii) An exclusion system is costly to administer. I cannot imagine industry players will take this duty on, and making it a government duty is taking away precious tax revenue. The "fines" system, on the other hand, generates revenue for the state, like traffic fines, and can help to pay for the administration of registration of STRA properties.

5) the papers mention that cost recovery of administration will be charged to hosts. This is simply too vague. You cannot issue policy that is vague and subject to individuals' interpretation. Please make it clear and simple to understand and communicate. If you cannot do so, then please remove such wording from the policy.

6) \$550 penalty notice offence amount is excessively high and some of the "offences" are beyond what a host can be reasonably expected to do. For example, how can a host stop a recalcitrant guest from making a copy of a key? How can a host make a guest inform him/her of a dispute/complaint from a neighbour? Again, this rule is too "grey". I recommend to remove it and instead adopt the idea of "fines" proposed in (4) above.

7) Some people have bought investment properties at the height of the real estate boom and relying on STRA income to make mortgage payments. I am not one of them, but to be fair, I think that the government should give 2-3 years' lead-time to implement new STRA rules as people who are affected by it can then have sufficient time to divest their properties if they decide that the new rules make their past decision to buy a house a bad one. The real estate market is bad enough without a sudden dumping of investment properties brought about by short notice of new STRA rules. Would be more prudent to give more leadtime, don't you think?

8) How can hosts check if guests are "excluded"? Surely this has to be the responsibility of the booking platforms rather than individual hosts. So much easier for them to add filters to their systems to check against a list than for hundreds of thousands of people to check against the list. So please amend the language in various papers to make it clear that this is the duty of the booking platforms.

9) Just simply remove 5.5.4 and 5.5.6 of the Draft Code Provision Part 5. "A guest must not copy or knowingly retain any key....." and "A guest must notify the host/host representative of any dispute or complaint.....". As stated above, it is simply not reasonable to expect hosts to control such behaviours if guests are bad and do such things, even if clearly instructed otherwise in instruction manuals.

10) Any complaint brought against a host/property must have the complainant's name and address clearly stated on it, for transparency and to avoid frivolous anonymous complaints. Please amend the language in Draft Code of Conduct for STRA accordingly.

I would be happy for you to contact me to discuss if you deem it useful.

Best regards,  
Jenny  
28/8/2019

**I agree to the above statement**

Yes

**From:** Jenny Shroff <jenny\_shroff@bigpond.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because I enjoy meeting and entertaining people, the Airbnb concept allows me to offer an alternate accommodation style to travellers, I live in Broken Hill so I also help the local community by recommending places of interest and places to eat, it also helps me financially to stay in my own property.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

#### STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

#### Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Jenny Shroff  
103 Sulphide St  
Broken Hill, Nsw 2880

**From:** Jenny Slater <bazzandjen@gmail.com>  
**Sent:** Thursday, 5 September 2019 12:00 PM  
**To:** DPE PS STHL Mailbox; Jenny Slater  
**Subject:** Holiday rental regulations for NSW

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** recorded and not sent to DCS, Purple category

Dear Minister, Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry. As a result, regulation for our sector should avoid unnecessary burdens on our operations. As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

Regards

BJ & JM Slater

**From:** Jenny Wilmot <jennypartos@gmail.com>  
**Sent:** Monday, 19 August 2019 4:05 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Re: Holiday rental regulations for NSW

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category, sent

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens on our operations.

As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

As holiday rentals like mine become more important to the tourism economy, it's my strong belief the NSW Government should build a regulatory solution that ensures the sector can reach its economic potential.

Thank you reading my submission.  
Jenny Wilmot

**From:** Jeremy Atcliffe <jatcliffe@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:22 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host (and someone who voted for you) I wanted to provide my feedback on the Government's proposed regulations.

My partner and I host on Airbnb because we can't afford to buy our own home and this gave us an entry into the property market. My Partner managed the property while looking after our newborn allowing her to work from home and generate some income for the family.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

#### STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

#### Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:



- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Jeremy Atcliffe  
2 Kendall St  
Surry Hills, Nsw 2010

**From:** Jeremy Martens <jeremypetermartens@me.com>  
**Sent:** Wednesday, 11 September 2019 2:20 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

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Thank you for reading my submission.

Regards,  
Jeremy Martens  
15 Railway Ave  
Minnamurra, Nsw 2533

**From:** Jeremy Norris <jeremy@byngstreet.com.au>  
**Sent:** Wednesday, 11 September 2019 2:13 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

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Thank you for reading my submission.

Regards,  
Jeremy Norris  
114 Heifer Station Ln  
Borenore, Nsw 2800

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Saturday, 7 September 2019 9:55 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** recorded in DPIE subs register, Purple category

Submitted on Sat, 07/09/2019 - 09:55

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Jeremy

**Last name**

Park

**Name withheld**

No

## Info

**Email**

[jeremy@jeremypark.com.au](mailto:jeremy@jeremypark.com.au)

**Suburb/Town & Postcode**

Thirroul

**Submission**

I am an Airbnb host but I don't necessarily support Airbnb on all aspects.

I support people being able to rent out part of their homes, but I do not support short term letting in Strata schemes. I feel it is unfair to other home owners in a strata/company title scheme. Having been an Airbnb host for many years and also previously in a strata I feel I understand the balance required.

I also think companies like Airbnb are avoiding paying Australian taxes and not acting as proper corporate citizens. They should be made to pay all incomes taxes and follow existing rental and property laws before they should be allowed to operate.

Airbnb is a great way for people to make some addition income from their home which people may not want rented out all of the time to a full time renter. So it actually helps hospitality and tourism in this way. Where hosts are listing homes that are not part of a home, (i.e. could be rented out easily full time), then I am against Airbnb.

In some areas, such as mine there is a definite lack of hotels and motels, which is why we are so busy with Airbnb. Short term rentals are definitely filling a need for places to stay in the Wollongong area. There should be a register for hosts that they need to join and prove they are both insured and have safe home to stay in.

More regulation on Airbnb and Hosts would be a good thing. I am a long term host, but still have limited trust for companies like Airbnb being able to self regulate.

Thank you for reading my submission.

**I agree to the above statement**

Yes

**From:** Jeremy Payne <jeremy.payne@belleproperty.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

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## STRA Property Register

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## Code of Conduct

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Thank you for reading my submission.

Regards,  
Jeremy Payne  
157 Nelson St  
Annandale, Nsw 2038

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 7:41 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** recorded in DPIE subs register

Submitted on Wed, 11/09/2019 - 07:40

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Jerry

**Last name**

Phillipson

**Name withheld**

No

## Info

**Email**

[jerryphillipson@gmail.com](mailto:jerryphillipson@gmail.com)

**Suburb/Town & Postcode**

Annandale 2038

**Submission**

Mandatory code of conduct is enough to regulate.

Please don't introduce registration system. It will create extra work and may discourage STRA. Please don't place any unnecessary burdens.

Please don't give any power to strata to ban STRA because they unfairly dictate other owners

Please allow STRA whole year without cap.

**I agree to the above statement**

Yes

**From:** Jervis Accommodation <jervisinfo@gmail.com>  
**Sent:** Monday, 19 August 2019 7:40 AM  
**To:** DPE PS STHL Mailbox  
**Subject:** Re: Holiday rental regulations for NSW

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category, sent

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens on our operations.

As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

As holiday rentals like mine become more important to the tourism economy, it's my strong belief the NSW Government should build a regulatory solution that ensures the sector can reach its economic potential.

Thank you reading my submission.

**From:** Jesse McBride <jesse@intolandscapes.com.au>  
**Sent:** Wednesday, 11 September 2019 2:23 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Jesse McBride  
21 Shallow Bay Rd  
Coomba Bay, Nsw 2428

**From:** Jessica Circosta <jess@citywater.com.au>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

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Thank you for reading my submission.

Regards,  
Jessica Circosta  
8 Stuart St  
Collaroy, Nsw 2097



**From:** Jessica Circosta <jess@citywater.com.au>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
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**Categories:** emailed to DCS, Tom Submission, Air BNB run

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Thank you for reading my submission.

Regards,  
Jessica Circosta  
8 Stuart St  
Collaroy, Nsw 2097

**From:** Jessie stone <jessiestone22@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism. The people who come and stay are coming to the area and spending money which is what is best for our economy. Stop making it so hard for everyone to live a happy life!!

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

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Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

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Thank you for reading my submission.

Regards,  
Jessie stone  
Northumberland St  
Neath, NSW 2326

**From:** Jianli Guo <guolily96@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because my granny flat is empty.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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Regards,  
Jianli Guo  
St Charbel Boulevard  
Werrington, Nsw 2747

**From:** Jikai Xie <kim272727@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

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Regards,  
Jikai Xie  
99 Forest Rd  
Hurstville, Nsw 2220



**From:** Jill DeClercq <declercq@westnet.com.au>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** David submissions, Air BNB run

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5 Paperbark St  
Sapphire Beach, Nsw 2450

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Thank you for reading my submission.

Regards,  
Jill DeClercq  
5 Paperbark St  
Sapphire Beach, Nsw 2450

**From:** Jill Hoorda <berrymountainlodge@live.com>  
**Sent:** Thursday, 5 September 2019 7:51 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** recorded and not sent to DCS, Purple category

Dear Minister, Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry. As a result, regulation for our sector should avoid unnecessary burdens on our operations. As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

Yours Sincerely  
Jill Swane

Sent from my iPhone

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**Sent:** Thursday, 5 September 2019 7:51 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

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Sent from my iPhone

**From:** Jill Wright <edenviewholidays@gmail.com>  
**Sent:** Thursday, 5 September 2019 9:55 AM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

**Categories:** Purple category

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens on our operations.

As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions on the amount of guests in a room for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on. Let me give you our example.

Our home is a 6 bedroom property on 5 acres, and is able to sleep 14 in beds, and 18 people if the two double futon beds are utilized. We are very popular for those wishing to have a family reunion or Christmas In July, whilst visiting the beautiful Hunter Valley. If these restriction are put in to place, it means that we could only host 12 people at the most, and larger families will have very limited probability to get together under the one roof.

I appreciate your consideration of my concerns.

Regards  
Jill Wright  
Edenview Holiday Rental  
134 Barraba Lane  
Quorrobolong NSW 2325  
0414 307 008



Virus-free. [www.avg.com](http://www.avg.com)

**From:** Jim Newcombe <jim\_newcombe@yahoo.com>  
**Sent:** Wednesday, 11 September 2019 2:22 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

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I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education



## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Jim Newcombe  
30 Bayline Dr  
Point Clare, Nsw 2250

## Short Term Rental Accommodation Reforms

As a resident in strata title property, my responses will be concentrating on the effect on Strata Title or Community Title properties.

- **Short Term Rental Accommodation Fire Safety Standard**

Support the provisions of Sections 4 & 5 of the proposed Fire Safety Standard.

Seek clarification that in Strata Title or Community Title properties, it is the hosts responsibility to provide a copy of fire safety statement for STRA Fire Safety Standard to local Council, over and above requirements of Owners Corporation or Community Association to provide fire safety statement to local Council under the Strata Schemes Management Act 2015 or the Community Land Development Act 1989. The host is also to provide a copy of the fire safety statement showing their STRA meets the STRA Fire Safety Standard to Owners Corporation or Community Association for their records.

- **Draft Code of Conduct for the Short-term Rental Accommodation Industry**

Section 5.2.5 (a), also not to list a property that is not registered as Short Term Rental Accommodation and been issued a unique identifier.

Aim is that booking platforms don't just not list excluded properties, but also only list compliant properties that have been issued a unique identifier that shows the host is agreeing that that property is following the Code of Conduct. Platforms are not able to list unregistered properties.

Section 5.4.8, when the notification is to be provided to a Owners Corporation or Community Association, the host is also to provided sufficient information to show that they have the insurances, compliance and approvals ( apart from this notification ) that their use as Short Term Rental Accommodation will not breach the insurance and compliance requirements of the Owners Corporation or Community Association that existed without the Short Term Rental Accommodation. The host(s) of any Short Term Rental Accommodation are to meet any additional requirements for insurances, compliance and approvals required by their proposed use of their property as Short Term Rental Accommodation.

- **State Environmental Planning Policy (Short-term Rental Accommodation) 2019**

All non-hosted Short Term Rental Accommodation is to be Complying Development, to enable more confidence that planning requirements are being met, particularly Fire Safety Standards.

- **Register of Short Term Rental Accommodation properties**

Limited information should be available apart from the notifications in 5.2.5 of the draft Code of Conduct

The local Council should have access listing showing all registered Short Term Rental Accommodation properties in their area.

Members of the Real Estate Institute of NSW should have access to listing showing address only of any properties that they manage as a rental agent or as as Strata Manager or Community Manager so they can ensure hosts compliance with rental or lease agreements where the host is not the owner of the property and strata or community requirements, such as provisions for subletting or fire safety compliance.

Costs of the the register should be borne by Short Term Rental Accommodation industry participants, however the register is there to serve the requirements of the State through the Secretary and participants are to ensure compliance so that additional regulation is not required.

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Sunday, 8 September 2019 9:20 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** recorded in DPIE subs register, Purple category

Submitted on Sun, 08/09/2019 - 21:18

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Jim

**Last name**

Turner

**Name withheld**

No

## Info

**Email**

[jtu37855@bigpond.net.au](mailto:jtu37855@bigpond.net.au)

**Suburb/Town & Postcode**

Strathfield 2135

**Submission file**

[short-term-rental-accommodation-response.odt](#)

**Submission**

Please see attached file.

**I agree to the above statement**

Yes

**From:** no-reply@planning.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Thursday, 22 August 2019 4:53 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category

Submitted on Thu, 22/08/2019 - 16:52

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Jimmy

**Last name**

Hayes

**Name withheld**

No

## Info

**Email**

[hayes\\_jimmy@hotmail.com](mailto:hayes_jimmy@hotmail.com)

**Suburb/Town & Postcode**

COOGEE

**Submission**

Hi generally I am in favour of introducing some state-wide regulations / legislation, so long as the administrative burden is not too high for individual hosts (which this appears to do), also any documentation should be user-friendly & easy to follow.

Please find attached a summary of my feedback based on the discussion paper (feedback in red).

The biggest point is that I really think that there should be something addressing damage or theft by guests in the code of conduct (under strikes)

Thank you for the opportunity to give feedback, if you have any queries please feel free to contact me

Jimmy Hayes

**I agree to the above statement**

Yes

**From:** Jimmy Manalis <jimmymanalis@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:23 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Rob submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Jimmy Manalis  
30 Wahroonga Rd  
Wyongah, Nsw 2259



**From:** Jimmy Pham <jimmy@youbnb.com.au>  
**Sent:** Tuesday, 10 September 2019 10:41 AM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

**Categories:** recorded and not sent to DCS, recorded in DPIE subs register, Purple category

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens on our operations.

As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

Sent from [Mail](#) for Windows 10

## **Observations on the new holiday letting regulations**

**By Jimmy Thomson of the Flat Chat website and newspaper column**

Both the proposed Code of Conduct and the Registry of STRA (holiday letting) premises are essential steps in allowing apartment owners and renters to regain some control over their homes.

The cavalier way in which the concept of genuine shared ownership (through such mechanisms as strata schemes) has been allowed to be undermined and damaged by entirely fake “sharing” in the commercial exploitation of empty homes, will some day be seen as the betrayal of whole communities that it is.

All the more shameful is the fact that this was perpetrated to allow a minority of individuals and one or two multinational corporations to make (literally) untold profits at the expense of people who believed they were buying and renting homes, not rooms in de facto hotels.

Meanwhile, the proven, fundamental dishonesty at the heart of the “home sharing” business is the only justification that the government needs for making the new regulations as tight and enforceable as required to restore some sanity to the sector.

Dishonesty? We are dealing with companies and individuals who use the flag of convenience of personal privacy to mask their true nature.

The great fiction that some online agencies are all about individuals letting rooms in their homes to impoverished visitors has been exploded time and again, yet it goes unchallenged by our lawmakers.

In short, we are dealing with entities that have shown themselves to be neither entirely honest nor transparent in their activities. They ignore proof that their hosts flout planning laws and strata by-laws, refusing to de-list them, despite claiming they require hosts to obey local laws.

These same agencies now expect us to believe that they should police themselves.

Based on their misleading publicity campaigns, their misrepresentation of statistics, their selective reporting and their failure to reveal the true extent and nature of their businesses, they cannot and should not be trusted.

The same applies to many of their hosts, many of whom for the past few years have knowingly flouted local council zoning and strata by-laws for their own profits. And perhaps both the agencies and their clients can start paying tax on those profits.

The proposed code of conduct and register should be allowed restore a level of honesty and decency to the holiday letting scene, especially in regard to apartment blocks. But that will only happen provided they are given teeth.

This is not about punishing genuine home-sharers. It's about deterring those who would break the rules in pursuit of profits, and that will require meaningful penalties and simple mechanisms by which the culprits can be exposed.

The registry should be a simple system, paid for via a fee to an independent, possibly commercial agency, which would provide two unique serial numbers – one for the host and one for the property.

Agencies that listed properties without having both serial numbers would be in breach. Proven breaches of the Code of Conduct would result in fines (as outlined) while the serial numbers would be blacklisted.

Further finessing of the rules could include:

1. Any breach of the Code of Conduct or failure to register should result in immediate, if temporary, suspension by the apartment and the host from all online agencies until the matter is resolved by an independent tribunal such as NCAT.
2. Owners Corporations should be allowed to charge illegal or unregistered holiday let "hosts" the full costs of investigations and tribunal actions, should it be proved they were operating illegally.
3. Illegal or unregistered holiday let hosts should be required to compensate owners' corporations by the amount they earned while they were operating illegally.
4. NCAT should be able to issue enforceable orders allowing officers and agents of the owners corporation, as well as fire safety officers, to enter apartments that they have good reason to believe are being used for illegal or unregistered short-term holiday lets, to check and gather evidence.
5. Owners and tenants of apartment who have been proved to be in breach of the code of conduct or the rules of the register, should have to inform any other strata scheme where they own or rent homes, that they have a history of ignoring or flouting the law.
6. All holiday let strata apartments should carry a 10 per cent additional fee on their levies to compensate for additional wear and tear of common property, use of facilities, additional administration costs and disruption.
7. From Day 1 of the new legislation, apartment blocks that have been given planning approval on the basis that they were not for holiday letting, should have, by default, a new by-law that reflects that status. This would protect owners who bought in on that basis. The owners corporation can remove or change the by-law by normal processes later, if they wish.

As a final observation, it's all very well for people to be excited and enthused by "disruptive" entrepreneurs. But this is an opportunity to assess who and what is being disrupted.

This is not just about noisy parties – far from it. One of the main reasons people choose to live in apartment blocks is for personal security. That is severely diminished when you don't know who your neighbours will be from one weekend to the next.

The whole strata system is based on all owners paying a fair share for the use of common property. That is disrupted by unfair “sharing” with paying guests.

And long-term tenants are having to compete with tourists if they want to stay in areas that they may have called home for decades.

It's time we stopped encouraging disruption for its own sake. This is an opportunity to apply logic and fairness to the situation before we end up worse off than the cities around the world that have already been gutted by holiday lets.

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 7:03 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Rob submission 3.0, non Air BNB run

Submitted on Wed, 11/09/2019 - 19:01

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Jimmy

**Last name**

Thomson

**Name withheld**

No

## Info

**Email**

[mail@jimmythomson.com](mailto:mail@jimmythomson.com)

**Suburb/Town & Postcode**

Kings Cross, Sydney. NSW 2011

**Submission file**

[holiday-letting-submission.docx](#)

## **Submission**

Observations on the new holiday letting regulations

By Jimmy Thomson of the Flat Chat website and newspaper column

Both the proposed Code of Conduct and the Registry of STRA (holiday letting) premises are essential steps in allowing apartment owners and renters to regain some control over their homes.

The cavalier way in which the concept of genuine shared ownership (through such mechanisms as strata schemes) has been allowed to be undermined and damaged by entirely fake “sharing” in the commercial exploitation of empty homes, will some day be seen as the betrayal of whole communities that it is.

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3. Illegal or unregistered holiday let hosts should be required to compensate owners' corporations by the amount they earned while they were operating illegally.

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It's time we stopped encouraging disruption for its own sake. This is an opportunity to apply logic and fairness to the situation before we end up worse off than the cities around the world that have already been gutted by holiday lets.

**I agree to the above statement**

Yes

**From:** Jing li <diamondhousesydney@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive. Z

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education



## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Jing li  
46 Savona Dr  
Wentworth Point, Nsw 2127

**From:** Jing Qiao <qiaojingsky@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

#### STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

#### Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Jing Qiao  
5 Nipper Street  
Homebush, Nsw 2140

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Saturday, 7 September 2019 4:00 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** recorded in DPIE subs register, Purple category

Submitted on Sat, 07/09/2019 - 04:00

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Joy

**Last name**

Chen

**Name withheld**

No

## Info

**Email**

[joyfuljoy@gmail.com](mailto:joyfuljoy@gmail.com)

**Suburb/Town & Postcode**

Darlington NSW 2008

## **Submission**

To whom it may concern,

As a local Airbnb host for 4 months, I wanted to provide my feedback on the Government's proposed regulations.

I'm from a new skilled immigrant family just settled in Sydney. It is not easy to start up in a brand new environment. Home-sharing helped us rely on our own efforts. We have never claimed any cent from benefit and we are always proud of that.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy". However, I am deeply concerned that the proposed rules will make it even infeasible for us to share our home.

Specifically, I want to comment on the following:

Per: Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, especially for the evacuation lighting systems.

First of all, I don't see any official data or reports supporting that properties for STRA are easier to catch fire than regular renting or residential dwellings. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests.

Moreover, as a strata-scheme property owner and owner corporation member, I understand how difficult, time-consuming and expensive it would be. Except for the cost of replacing the detector itself, according to the by-law, I'll need to pay extra and go through a special resolution on an extra general meeting before any modification can be applied to the existing fire safety devices.

Of course, I understand that it's always important to do improvements for guests' safety. I'm already looking for batteries operated emergency lights which could be activated by siren and motion. I believe these products could provide the same protection as those smoke detector incorporated lights in the requirements.

Per: Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home-sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

Please be advised, I am not anti-regulation by any stretch, but I need fair and reasonable regulation. Generally I support the Government's approach of regulating this industry, however, parts of the proposals are just unfair.

Thank you very much for your time!

Regards,  
Joy

**I agree to the above statement**  
Yes

**From:** Jo Johnstone-Burt <job1412@gmail.com>  
**Sent:** Thursday, 5 September 2019 11:21 AM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry. As a result, regulation for our sector should avoid unnecessary burdens on our operations.

As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

Thank you for the opportunity to give this important feedback.

Regards  
Jo Johnstone-Burt

**From:** Jo sheehy <josheehy@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

#### STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

#### Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

#### STRA Property Register



I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Jo sheehy  
19 Duke St  
Forestville, Nsw 2087

# STRA Code of Conduct & Registration Feedback

Topic	Question
Planning instruments	<p>1. What is your view on the form of and provisions in the STRA SEPP, Regulation and Safety Standard?</p> <p>All dwellings –</p> <ul style="list-style-type: none"> <li>• Agree no more than 2 persons per bedroom / 12 persons per property.</li> <li>• Agree to smoke alarms</li> <li>• Don't agree with lighting of hallway unless it is part of the smoke alarm itself – overkill</li> </ul> <p>Multi unit –</p> <ul style="list-style-type: none"> <li>• Agree but believe that all external doors for ALL properties should be openable without a key internally</li> <li>• Agree but believe that fire extinguishers &amp; fire blanket in kitchen for ALL properties</li> <li>• Agree with evacuation signage</li> </ul> <p>Standalone dwellings</p> <ul style="list-style-type: none"> <li>• Agree with heat detector when garage is not accessible by guest and underneath the property</li> </ul>
	<p>2. Are there any elements of the draft instrument that are open to misinterpretation or require further clarification?</p> <p>No</p>
	<p>3. What are your views on new policy elements relating to days, flood control lots and bushfire prone land?</p> <p>Byron Shire Council (BSC) are proposing to reduce STRA to 90 days or less shire wide. BSC is required to prepare “a planning proposal to identify or reduce the number of days that non-hosted short-term rental accommodation may be carried out in parts of its local government area”, as per Ministerial Direction 3.7. They are putting forward via this submission process a request to reduce all holiday letting in Byron Shire to 180 days until such time as they prepare the planning proposal referenced above. They have not made any contact with any relevant parties in determining the impact that this will definitely have on the economy of the towns of the Shire. They are only focused on issues that are experienced in the town of Byron Bay, and not on the detrimental tourism &amp; economic impacts on the other towns eg. Brunswick Heads, New Brighton, South Golden Beach, Bangalow, etc..</p> <p>We agree with the restriction not being imposed in the Byron Shire, except if deemed necessary in Byron Bay itself, which leaves the number of lettable days at 365 days per year.</p> <p>Due to council's negative view on STRA as a whole, we have concerns around council's involvement when determining a properties complying development eligibility.</p> <p>We agree in principal with the flood &amp; fire safety requirements but need to determine the extent of the impact for our local area as we are surrounded by bush &amp; the majority of the Northern Rivers is flood susceptible.</p>

Code: Industry participants' obligations	<p>4. Are the general obligations for industry participants adequate? If not, what other general obligations should be considered? Why?</p> <p>Yes</p> <p>5. What types of STRA information will be useful for the Secretary to collect to inform the further improvement of the Code and the STRA regulatory framework? Why?</p> <p>The Secretary could ask for a copy of participants complaint registers to determine the type &amp; extent of complaints experienced to date.</p> <p>Ours, for example, will show how little of a problem the North Byron Shire is experiencing.</p> <p>6. Are the specific obligations on booking platforms, letting agents, hosts, guests and facilitators in the Code adequate? If not, what other obligations should be considered for each of these industry participants? Why?</p> <p>Yes in relation to guests, booking platforms &amp; letting agents.</p> <p>We do not agree with Hosts having to have insurance that covers the Guests &amp; their visitors belongings. How can a host be liable if a guest leaves the front door open and something is stolen, for example? This surely falls under travel insurance</p>
Code: Complaints	<p>7. Is the complaints process detailed in part 6 of the Code sufficient? If not, what other matters should be considered or set out in the process? Why?</p> <p>No</p> <p>All complaints must go to the host / letting agent first in order to be given the opportunity to rectify any concerns within a reasonable amount of time. If the issue continues to be a problem, this is when the Commissioner should become involved.</p>
Code: Compliance and Enforcement	<p>8. Are the grounds for recording a strike fair and reasonable? What other matters (if any) should the Commissioner consider when deciding whether to record a strike? Why?</p> <p>Yes, in theory. However, we have concerns around what determines whether the complaint is legitimate. And how whether the expectations of a guest is realistic when viewing a property online, for example, as opposed to actually viewing the house in person. It is understood that a property can not be misrepresented but still at times a persons perception may differ from what is reality</p> <p>Another concern we have is if person A is on the exclusion register so they get person B to make the booking. When taking bookings we only enter 1 persons details, not all the parties that will be holidaying in the property.</p> <p>9. What are potential ways to facilitate industry participants' access to the exclusion register while limiting potential privacy impacts? What factors should be considered?</p> <p>All participants hold a registration number. These numbers are checkable on the register. This number will advise whether the participant is excluded without providing any personal information.</p> <p>10. Is the review process clear and sufficient? What other matters (if any) should be considered? Why?</p> <p>Yes</p>

Code: Penalty notice offences and civil penalties	<p>11. Are the proposed penalty notice offence and civil penalty provisions appropriate? What provisions should or should not be identified as penalty notice offence and/or civil penalty provisions? Why?</p> <p>We find the penalties rather excessive. This is a holiday letting industry – it does not involve serious infractions like Trust Account fraud.</p>
Amendment Regulation: Prescribed classes of STRA industry participant	<p>12. Does clause 22B(1) appropriately capture end to end property management services that specifically service STRA properties? Why or why not?</p> <p>Yes</p>
	<p>13. What other organisations or persons should be prescribed classes of STRA industry participants (if any)? Why?</p> <p>None</p>
Amendment Regulation: STRA industry participants excluded from Code of Conduct	<p>14. Is it appropriate to exclude the STRA industry participants set out in clause 22C? Why or why not?</p> <p>Yes</p>
	<p>15. What other STRA operators (if any) should be excluded from being covered by the Code? Why?</p> <p>None</p>
Amendment Regulation: Appeals against listing on exclusion register	<p>16. Is the appeals process clear and sufficient? What other matters (if any) should be considered? Why?</p> <p>Yes</p>
Amendment Regulation: Fees and cost recovery	<p>17. Which industry participants should contribute to the cost of administering and enforcing the Code? Why?</p> <p>The Guest</p>
	<p>18. How should costs be apportioned across different STRA industry participants? Why?</p> <p>Registration Fee – for Guest to register</p> <p>Registration Fee – for property to register</p> <p>Administration Fee – per booking, per property paid for by Guest</p>
Amendment Regulation: Penalties	<p>19. Is the proposed penalty notice offence amount appropriate? Why or why not?</p> <p>Excessive for a first offense. Maybe it would be more appropriate to determine the penalty amount around a certain % of the booking amount that it relates to</p>
Proposed industry-led property register	<p>20. How can industry be organised to develop and manage the registration system?</p> <p>Through a STRA committee of relevant parties eg. Those listed on Appendix 2</p> <p>Those that should not be part of the STRA committee include local council members.</p>
	<p>21. What would be the costs to industry in establishing and maintaining the register? How would industry propose to meet these costs?</p> <p>Registration Fee – for Guest to register</p>

<p>Registration Fee – for property to register</p> <p>Administration Fee – per booking, per property paid for by Guest</p>
<p>22. What role should the Government play in developing or overseeing the register, if any?</p> <p>They should have a State Govt representative in the STRA committee mentioned in question 20 above</p>
<p>23. Are there other outcomes a register should deliver?</p> <p>No</p>
<p>24. How can the approach ensure registration applies to all STRA operators, regardless of how the property is advertised for rent?</p> <p>Determined by the STRA Committee</p>
<p>25. What audit and verification processes would be needed to ensure accuracy of data?</p> <p>Determined by the STRA Committee</p>

<p>26. Should there be separate or additional penalties for failure to register? If so, which industry participants should they be imposed on?</p> <p>No, covered in penalties above</p>
<p>27. What information should the register collect? Why?</p> <p>Agree – name &amp; contact details of host</p> <p>Agree – address of property</p> <p>Do not agree – it should be number of days the property is actually stayed in – <b>bookings</b> can be cancelled.</p> <p>Do not agree – that should already have been determined regarding strata compliance, by laws &amp; STRA</p> <p>Agree – but breach information should not be viewable by general public; only whether they are excluded or not</p> <p>Also on the register should be Guest name &amp; contact details</p>
<p>28. What role should different industry participants (e.g. hosts and booking platforms) play in the registration process?</p> <p>None – only once place / site to register</p>
<p>29. What role should Government play in the registration process or providing information for the register?</p> <p>None</p>
<p>30. Should any information on the register be made publicly available? If so, what information could be made available and why?</p> <p>Only whether a participant is excluded or not</p>
<p>31. Should industry be required to report registration information, including number of stays (days), to Government and/or local councils? If so, how frequently? Why?</p> <p>Not directly. They can refer to the register</p>

	<p>32. Should any information on the register be made publicly available? Why?</p> <p>Same question as 30</p>
Commencement of regulatory framework	<p>33. How much lead time would industry need to develop and establish the proposed STRA property register? Please provide reasons.</p> <p>Councils should have to apply for any request to limit number of days a holiday property is lettable prior to the establishment of the STRA register &amp; the regulatory framework.</p> <p>Holiday home owners will need to determine the viability of continuing to holiday let with the reduction in income &amp; costs associated with the compliance of the Code if the number of days a property can be let are reduced from 365.</p> <p>34. When should the STRA regulatory framework start? Please provide reasons.</p> <p>Refer question 33</p>
12-month review of regulatory framework	<p>35. Do you support the proposed scope of the review? What additional considerations might be necessary?</p> <p>Yes</p> <p>36. What data sources could the NSW Government use to inform the review? How can industry and councils assist with data collection for the review?</p> <p>Voluntary submissions from participants &amp; / or surveys issued to registered participants.</p>

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Tuesday, 10 September 2019 12:10 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Sylvia submissions, recorded in DPIE subs register, Purple category

Submitted on Tue, 10/09/2019 - 11:54

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Joan

**Last name**

Hoyle

**Name withheld**

No

## Info

**Email**

[joan.hoyle.32@gmail.com](mailto:joan.hoyle.32@gmail.com)

**Suburb/Town & Postcode**

New Brighton 2483

**Submission file**

[stra-code-of-conduct-and-registration-feedback\\_submission.pdf](#)

**Submission**

Please find attached submission. The holiday home we own in New Brighton has been used as short and long term rentals since my family bought the property in 1954. New Brighton has always been a holiday destination for families living elsewhere and as a child in the 50 and 60'ies we visited the home at least twice a year from Sydney and rented it at other times. There are no motels or hotels in New Brighton and short term holiday letting is the only option for other families to enjoy the area as much as I have for over the last 60 years. My husband and I have used the home more since we have both retired - but as pensioners we rely on short term holiday letting to help us pay excessive insurance premiums, energy costs, higher rates and general maintenance as we are close to salt air and some flooding as there is no storm water drains in the area.

**I agree to the above statement**

Yes



**From:** Joanna Dockerty <joanna.reeve70@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
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- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Joanna Dockerty  
1666 Oxley Hwy  
Wallamore, Nsw 2340

**From:** Joanna Wolfe <jwolfe68@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:20 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

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Thank you for reading my submission.

Regards,  
Joanna Wolfe  
20 Alexandria Parade  
South Coogee, Nsw 2034

**From:** JOANNE COUGHLAN <joeycoughlan@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:22 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it is a major income for myself and my husband in retirement. With these new rules, our income will be halved immediately plus the cost of implementing all the new requirements.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

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Thank you for reading my submission.

Regards,  
JOANNE COUGHLAN  
13 Stuart St  
Manly, Nsw 2095

**From:** no-reply@planning.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Friday, 23 August 2019 12:05 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category

Submitted on Fri, 23/08/2019 - 12:05

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Joanne

**Last name**

Mobbs

**Name withheld**

No

## Info

**Email**

[chippendale@acebodycorp.com.au](mailto:chippendale@acebodycorp.com.au)

**Suburb/Town & Postcode**

Chippendale

**Submission**

I am a strata manager whose company manages 74 buildings currently. During discussions with the owners corporations, it has become very clear that 73 of the 74 that we manage are strongly opposed to short term letting of whole apartments (as opposed to short term letting of a room in an apartment with the owner or tenant in situ) for the following reasons;

1. Security of the building
2. No mechanism to control the behaviour of the short term tenants through the by-laws - they can not be brought before NCAT they will be gone.
3. No means for an owners corporation to check that the code of conduct is being applied - how do they know who is occupying a unit from night to night when they have no right to access a unit and may have no part in the dealings of a lot - no means of verifying the short term letting record of the home seems to exist in these documents for owners corporations.
4. There has been discussion that owners corporations may make a by-law to restrict short term letting, this did not appear to be clear in these documents and there appears to be no information of how restrictive a by-law can be and whether it can completely ban short term letting, the code of conduct should clearly contain this information and I would suggest that perhaps model by-laws for strata (of which there are now more than 90,000 in NSW) be contained in the code of conduct that can be used by strata buildings much as those contained in the Schedule of the Strata Schemes Management Act 2015 be added for simplification.

The feeling against short term letting is in many cases so strong on strata properties and other shared communities that unless there is a mechanism for these communities to simply and clearly control the level of short term rentals as they determine, I fear that people will take their objections into their own hands and that eventually it will result in violence.

**I agree to the above statement**

Yes



**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Tuesday, 10 September 2019 7:26 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Rob submission, recorded in DPIE subs register

Submitted on Tue, 10/09/2019 - 19:26

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Joanne

**Last name**

Moore

**Name withheld**

No

## Info

**Email**

[nickandjomoore@bigpond.com](mailto:nickandjomoore@bigpond.com)

**Suburb/Town & Postcode**

Pullenvale 4069

**Submission**

I wish to submit my objection to the Short Term Holiday Rental policy that is currently being discussed.

My family has been in the accommodation industry for over 36 years in Byron Bay and we have never seen such a decline in trade as that since AirBnB/short term holiday rentals have started up and taken over Byron Bay.

The thousands of homes that are now short term holiday rentals have killed the permanent rental market and the accommodation industry. Businesses are closing and struggling to keep open - that is a fact.

Byron Bay is the jewel in the NSW crown and this policy being put forward through parliament is going to destroy the fabric of this unique and beautiful town. A 90 day cap MUST BE put in place, Council MUST BE given the power back to oversee and implement their own policies to protect our town and there needs to be a level playing field.

These holiday houses need to be made accountable, they need to be registered with the ATO, they must have to pay commercial rates, land tax, GST, DA fees etc. All the commercial rates etc that legitimate businesses are having to pay is killing them. There is no incentive to operate a business legitimately, we should all relinquish our licences and practice under these new "share economy" laws and just pay residential rates etc. which will decimate and cripple our councils funds.

Please look at other countries and cities around the world - there are precedences everywhere in controlling these matters - Japan, New York, Spain, the list goes on.

Stand up now to AirBnB before it is too late and they destroy the jewel in NSW crown forever.

**I agree to the above statement**

Yes

**From:** Joanne stovell <joanne.stovell@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

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I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

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- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Joanne stovell  
70 Plowman St  
North Bondi, Nsw 2026

**From:** Jocelyn King <jocelyn@fivegrants.com.au>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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I host on Airbnb because I need the income to keep the farm.

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Thank you for reading my submission.

Regards,  
Jocelyn King  
32 South St  
Ellalong, Nsw 2325

# STRA Code of Conduct & Registration Feedback

Topic	Question
Planning instruments	<p>1. What is your view on the form of and provisions in the STRA SEPP, Regulation and Safety Standard?</p> <p>All dwellings –</p> <ul style="list-style-type: none"> <li>• Agree no more than 2 persons per bedroom / 12 persons per property.</li> <li>• Agree to smoke alarms</li> <li>• Don't agree with lighting of hallway unless it is part of the smoke alarm itself – overkill</li> </ul> <p>Multi unit –</p> <ul style="list-style-type: none"> <li>• Agree but believe that all external doors for ALL properties should be openable without a key internally</li> <li>• Agree but believe that fire extinguishers &amp; fire blanket in kitchen for ALL properties</li> <li>• Agree with evacuation signage</li> </ul> <p>Standalone dwellings</p> <ul style="list-style-type: none"> <li>• Agree with heat detector when garage is not accessible by guest and underneath the property</li> </ul>
	<p>2. Are there any elements of the draft instrument that are open to misinterpretation or require further clarification?</p> <p>No</p>
	<p>3. What are your views on new policy elements relating to days, flood control lots and bushfire prone land?</p> <p>Byron Shire Council (BSC) are proposing to reduce STRA to 90 days or less shire wide. BSC is required to prepare “a planning proposal to identify or reduce the number of days that non-hosted short-term rental accommodation may be carried out in parts of its local government area”, as per Ministerial Direction 3.7. They are putting forward via this submission process a request to reduce all holiday letting in Byron Shire to 180 days until such time as they prepare the planning proposal referenced above. They have not made any contact with any relevant parties in determining the impact that this will definitely have on the economy of the towns of the Shire. They are only focused on issues that are experienced in the town of Byron Bay, and not on the detrimental tourism &amp; economic impacts on the other towns eg. Brunswick Heads, New Brighton, South Golden Beach, Bangalow, etc..</p> <p>We agree with the restriction not being imposed in the Byron Shire, except if deemed necessary in Byron Bay itself, which leaves the number of lettable days at 365 days per year.</p> <p>Due to council's negative view on STRA as a whole, we have concerns around council's involvement when determining a properties complying development eligibility.</p> <p>We agree in principal with the flood &amp; fire safety requirements but need to determine the extent of the impact for our local area as we are surrounded by bush &amp; the majority of the Northern Rivers is flood susceptible.</p>

Code: Industry participants' obligations	<p>4. Are the general obligations for industry participants adequate? If not, what other general obligations should be considered? Why?</p> <p>Yes</p> <p>5. What types of STRA information will be useful for the Secretary to collect to inform the further improvement of the Code and the STRA regulatory framework? Why?</p> <p>The Secretary could ask for a copy of participants complaint registers to determine the type &amp; extent of complaints experienced to date.</p> <p>Ours, for example, will show how little of a problem the North Byron Shire is experiencing.</p> <p>6. Are the specific obligations on booking platforms, letting agents, hosts, guests and facilitators in the Code adequate? If not, what other obligations should be considered for each of these industry participants? Why?</p> <p>Yes in relation to guests, booking platforms &amp; letting agents.</p> <p>We do not agree with Hosts having to have insurance that covers the Guests &amp; their visitors belongings. How can a host be liable if a guest leaves the front door open and something is stolen, for example? This surely falls under travel insurance</p>
Code: Complaints	<p>7. Is the complaints process detailed in part 6 of the Code sufficient? If not, what other matters should be considered or set out in the process? Why?</p> <p>No</p> <p>All complaints must go to the host / letting agent first in order to be given the opportunity to rectify any concerns within a reasonable amount of time. If the issue continues to be a problem, this is when the Commissioner should become involved.</p>
Code: Compliance and Enforcement	<p>8. Are the grounds for recording a strike fair and reasonable? What other matters (if any) should the Commissioner consider when deciding whether to record a strike? Why?</p> <p>Yes, in theory. However, we have concerns around what determines whether the complaint is legitimate. And how whether the expectations of a guest is realistic when viewing a property online, for example, as opposed to actually viewing the house in person. It is understood that a property can not be misrepresented but still at times a persons perception may differ from what is reality</p> <p>Another concern we have is if person A is on the exclusion register so they get person B to make the booking. When taking bookings we only enter 1 persons details, not all the parties that will be holidaying in the property.</p> <p>9. What are potential ways to facilitate industry participants' access to the exclusion register while limiting potential privacy impacts? What factors should be considered?</p> <p>All participants hold a registration number. These numbers are checkable on the register. This number will advise whether the participant is excluded without providing any personal information.</p> <p>10. Is the review process clear and sufficient? What other matters (if any) should be considered? Why?</p> <p>Yes</p>



Code: Penalty notice offences and civil penalties	<p>11. Are the proposed penalty notice offence and civil penalty provisions appropriate? What provisions should or should not be identified as penalty notice offence and/or civil penalty provisions? Why?</p> <p>We find the penalties rather excessive. This is a holiday letting industry – it does not involve serious infractions like Trust Account fraud.</p>
Amendment Regulation: Prescribed classes of STRA industry participant	<p>12. Does clause 22B(1) appropriately capture end to end property management services that specifically service STRA properties? Why or why not?</p> <p>Yes</p>
	<p>13. What other organisations or persons should be prescribed classes of STRA industry participants (if any)? Why?</p> <p>None</p>
Amendment Regulation: STRA industry participants excluded from Code of Conduct	<p>14. Is it appropriate to exclude the STRA industry participants set out in clause 22C? Why or why not?</p> <p>Yes</p>
	<p>15. What other STRA operators (if any) should be excluded from being covered by the Code? Why?</p> <p>None</p>
Amendment Regulation: Appeals against listing on exclusion register	<p>16. Is the appeals process clear and sufficient? What other matters (if any) should be considered? Why?</p> <p>Yes</p>
Amendment Regulation: Fees and cost recovery	<p>17. Which industry participants should contribute to the cost of administering and enforcing the Code? Why?</p> <p>The Guest</p>
	<p>18. How should costs be apportioned across different STRA industry participants? Why?</p> <p>Registration Fee – for Guest to register</p> <p>Registration Fee – for property to register</p> <p>Administration Fee – per booking, per property paid for by Guest</p>
Amendment Regulation: Penalties	<p>19. Is the proposed penalty notice offence amount appropriate? Why or why not?</p> <p>Excessive for a first offense. Maybe it would be more appropriate to determine the penalty amount around a certain % of the booking amount that it relates to</p>
Proposed industry-led property register	<p>20. How can industry be organised to develop and manage the registration system?</p> <p>Through a STRA committee of relevant parties eg. Those listed on Appendix 2</p> <p>Those that should not be part of the STRA committee include local council members.</p>
	<p>21. What would be the costs to industry in establishing and maintaining the register? How would industry propose to meet these costs?</p> <p>Registration Fee – for Guest to register</p>

<p>Registration Fee – for property to register</p> <p>Administration Fee – per booking, per property paid for by Guest</p>
<p>22. What role should the Government play in developing or overseeing the register, if any?</p> <p>They should have a State Govt representative in the STRA committee mentioned in question 20 above</p>
<p>23. Are there other outcomes a register should deliver?</p> <p>No</p>
<p>24. How can the approach ensure registration applies to all STRA operators, regardless of how the property is advertised for rent?</p> <p>Determined by the STRA Committee</p>
<p>25. What audit and verification processes would be needed to ensure accuracy of data?</p> <p>Determined by the STRA Committee</p>

<p>26. Should there be separate or additional penalties for failure to register? If so, which industry participants should they be imposed on?</p> <p>No, covered in penalties above</p>
<p>27. What information should the register collect? Why?</p> <p>Agree – name &amp; contact details of host</p> <p>Agree – address of property</p> <p>Do not agree – it should be number of days the property is actually stayed in – <b>bookings</b> can be cancelled.</p> <p>Do not agree – that should already have been determined regarding strata compliance, by laws &amp; STRA</p> <p>Agree – but breach information should not be viewable by general public; only whether they are excluded or not</p> <p>Also on the register should be Guest name &amp; contact details</p>
<p>28. What role should different industry participants (e.g. hosts and booking platforms) play in the registration process?</p> <p>None – only once place / site to register</p>
<p>29. What role should Government play in the registration process or providing information for the register?</p> <p>None</p>
<p>30. Should any information on the register be made publicly available? If so, what information could be made available and why?</p> <p>Only whether a participant is excluded or not</p>
<p>31. Should industry be required to report registration information, including number of stays (days), to Government and/or local councils? If so, how frequently? Why?</p> <p>Not directly. They can refer to the register</p>

	<p>32. Should any information on the register be made publicly available? Why?</p> <p>Same question as 30</p>
Commencement of regulatory framework	<p>33. How much lead time would industry need to develop and establish the proposed STRA property register? Please provide reasons.</p> <p>Councils should have to apply for any request to limit number of days a holiday property is lettable prior to the establishment of the STRA register &amp; the regulatory framework.</p> <p>Holiday home owners will need to determine the viability of continuing to holiday let with the reduction in income &amp; costs associated with the compliance of the Code if the number of days a property can be let are reduced from 365.</p> <p>34. When should the STRA regulatory framework start? Please provide reasons.</p> <p>Refer question 33</p>
12-month review of regulatory framework	<p>35. Do you support the proposed scope of the review? What additional considerations might be necessary?</p> <p>Yes</p> <p>36. What data sources could the NSW Government use to inform the review? How can industry and councils assist with data collection for the review?</p> <p>Voluntary submissions from participants &amp; / or surveys issued to registered participants.</p>

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Monday, 9 September 2019 8:18 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** recorded in DPIE subs register, Purple category

Submitted on Mon, 09/09/2019 - 08:17

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Jodie

**Last name**

Kerr

**Name withheld**

No

## Info

**Email**

[jodie@preferredbuilders.com.au](mailto:jodie@preferredbuilders.com.au)

**Suburb/Town & Postcode**

New Brighton

**Submission file**

[stra-code-of-conduct-and-registration-feedback.pdf](#)

**Submission**

see attached

**I agree to the above statement**

Yes

**From:** Jodie Silcock <jodie\_silcock@yahoo.com.au>  
**Sent:** Wednesday, 11 September 2019 2:16 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

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I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

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Thank you for reading my submission.

Regards,  
Jodie Silcock  
27 Penkivil St  
Bondi, Nsw 2026

**From:** Jody Newhouse <jody@canoeadventures.com.au>  
**Sent:** Sunday, 8 September 2019 12:54 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens on our operations.

As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

Jody Newhouse

4 Tyson St Fernmount via Bellingen NSW 2454  
6655 - 9955



**From:** Jody Newhouse <jody@canoeadventures.com.au>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it is so rewarding to share my beautiful home with travellers and giving them 'local' knowledge about the area. It has become an important income stream and more importantly, creating more jobs in our small country town (Population 2500)

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

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Thank you for reading my submission.

Regards,  
Jody Newhouse  
Tyson St  
Fernmount, Nsw 2454

**From:** Joe and Judy Mellis <jmellis@bigpond.net.au>  
**Sent:** Tuesday, 17 September 2019 10:48 AM  
**To:** DPE PS STHL Mailbox  
**Subject:** STRA Discussion Paper

**Categories:** Tessa Submissions

We are a retired couple owning an apartment at 127 Kent Street, Miller's Point.

We really love living here and enjoying the lifestyle, the amenities, the social groups and just mixing with the many like-minded people living in our apartment block.

We therefore strongly object to any proposal that will affect the ambience of our home, which is often referred to as a 'vertical village'. Some disruptions would include;

- Our shared facilities e.g. our pool, gym, sauna, lounge area, library etc. could just become noisy public areas if allowed to be used by anyone. They are currently there for the needs of permanent residents and would have trouble coping with the added load of constantly changing short term visitors
- The addition of short term visitors would add to the cost of running and maintaining a strata building due to need for extra concierge, cleaning and building management assistance and support. This would increase the cost of living by raising levies for all residents. Not only is this unfair, there are many retired couples like us living in the building who are of necessity careful with expenditure
- Every strata building is different and should have the right to decide its own policy re STRA by special resolution requiring a majority vote
- The extra and excessive noise generated by short term visitors with constant moving in and out, parties etc. as they do not have the same feeling of responsibility and commitment to the building as do long term residents

Yours sincerely  
J and J Mellis

**From:** Joe Genova <joe\_s\_genova@yahoo.com>  
**Sent:** Wednesday, 11 September 2019 2:22 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Joe Genova  
21 Alberta St  
Sydney, Nsw 2000

**From:** John Anderson <andovil@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

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I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
John Anderson  
25 Boomerang St  
Kingscliff, Nsw 2487

## NSW Department of Planning, Industry and Environment

### STRA Submission

We would like to make the following points related to the regulation of STRA.

1. We feel strongly that as retirees renting a single room in our house where we are also onsite managers, that we should be exempt development and we should be permitted to let a single room in our house 365 days per year as STRA.
2. We feel that local councils should follow to the letter the NSW Department of Planning, Industry and Environment STRA regulatory policy and not be allowed to self regulate and make policy on the hoof.
3. We see the potential for local councils to create controls to make STRA regulations undesirable, unprofitable or to make regulatory conditions prohibitive for persons wishing to rent their premises or a room on a short term basis.
4. We see that the new laws for STRA regulation may be construed by over zealous local councils who are keen to be seen 'to be (politically) doing the right thing'. This can lead to over regulation.
5. We believe that persons who are letting whole premises or dwellings, where they are often absentee landlords should be regulated by STRA policy since they are removing housing stock for long term rentals.
6. We believe that any regulatory policy should delineate between persons who are renting a single room in their house and are onsite managers, and persons who are letting whole premises or dwellings.
7. We believe that any STRA regulation should be uniformly administered by all local councils according to the NSW Department of Planning, Industry and Environment STRA regulatory policy.
8. We agree in principle that STRA needs to be regulated with a universal policy that is adhered to by all councils with no 'special exceptions'.  
However, we believe that regulation should be specific in terms of the type of STRA being offered and the degree of associated STRA impact to the local council area on a case by case basis.
9. We feel strongly that any STRA regulation should not adversely affect Tourism and Business or Employment and there should be an emphasis on creating a fair but moderate solution to STRA regulatory legislation.





**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 4:38 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Rob submission 3.0, non Air BNB run

Submitted on Wed, 11/09/2019 - 16:36

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

john

**Last name**

bassett

**Name withheld**

No

## Info

**Email**

[bassettjohn@hotmail.com](mailto:bassettjohn@hotmail.com)

**Suburb/Town & Postcode**

2481

**Submission file**

[stra-submission.pdf](#)

**Submission**

Please find attached STRA submission

**I agree to the above statement**

Yes

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Friday, 6 September 2019 12:05 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category

Submitted on Fri, 06/09/2019 - 12:04

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

**First name**

John

**Last name**

Bullard

**Name withheld**

No

## Info

**Email**

[jbul672150@aol.com](mailto:jbul672150@aol.com)

**Suburb/Town & Postcode**

2067

## **Submission**

This submission is in response to the request for submissions in the Short Term Rental Accommodation New regulatory Framework Discussion Document.

I am the Strata Committee Chairman making the submission on behalf of the Strata Committee. The Strata (SP 65600 ) is part of a residential and commercial organisation which occupies a full CBD block containing three stratas two of which are high density residential with 565 lots.

This submission raises three points

### **1. Fair Trading Amendment (STRA) Bill 2018 Schedule 2.**

The proposed Strata Schemes Management Act 2015 amendment, section 137A is welcomed as it ensures that STRA will be hosted, with the property owners in residence.

137A permits a host to be absent during a short term stay. This should not be interpreted as permission for the stays to be unhosted. To avoid any doubt on this it is proposed that an addition be made to the wording of 137A as follows: "For short and irregular absences of the host for work or holidays, the host is to inform the owners' corporation of the dates of absence and the contact details for his representative who will look after his guests and their visitors while he is absent."

### **2. Draft Code of Conduct for the Short Term Rental Accommodation Industry.**

In the definitions 'host' "means a person who, pursuant to a short-term rental accommodation arrangement, gives another person the right to occupy the residential premises to which the arrangement relates."

If the property is it rented is it the tenant or the owner who is acting as host? If it is the tenant he will need the approval of the property owner to carry out short term renting. He will also need to make arrangements with the owner to carry out the prerequisite actions required before a property can be offered for short term rental. In summary these are for a strata lot.

- a. In accordance with our existing strata by -laws inform the owners' corporation about the change in use of the property from residential to commercial for short term rentals.
- b. Arrange public liability insurance ( draft code of conduct 5.4.3 )
- c. Inform his owners corporation and the lot physical neighbours of the intention to carry out short term renting. (draft code of conduct 5.4.8)
- d. Arrange for work to upgrade the fire safety equipment to meet the requirements of the Short-term Rental Accommodation Fire Safety Standard and have the work certified. ( Short-term Rental Accommodation Fire Safety Standard )

3. The introduction of a mandatory registration property register of all properties which are qualified for short term rental is strongly supported. All Industry participants should have access to the register which could become the primary industry tool for verifying that a property is available and qualified for short term rental

## **I agree to the above statement**

Yes

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Tuesday, 10 September 2019 11:20 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Tessa Submissions, recorded in DPIE subs register, Purple category

Submitted on Tue, 10/09/2019 - 11:19

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

John C

**Last name**

Mannering

**Name withheld**

No

## Info

**Email**

[igahunter@hotmail.com](mailto:igahunter@hotmail.com)

**Suburb/Town & Postcode**

2315

**Submission**

If it's ok for permanent accommodation to be allowed on bush fire prone land then STRA should be treated the same, especially if the new new safety standards are adopted or if the dwelling has been built to recent standards. This proposal would exclude a lot of urban housing especially in the Blue Mountains and other areas most people would not think of.

Restricting the number of persons per bedroom would effect many family situations and would be difficult to police where children are involved.

**I agree to the above statement**

Yes

**From:** no-reply@planning.nsw.gov.au on behalf of Department of Planning,  
Industry and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Thursday, 15 August 2019 12:59 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Cc:** DPE PS ePlanning Mailbox  
**Subject:** Have your say on Short Term Rental Accommodation

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category

Submitted on Thu, 15/08/2019 - 12:58

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

John

**Last name**

Christie

**Name withheld**

No

## Info

**Email**

[john.christie20@bigpond.com](mailto:john.christie20@bigpond.com)

**Suburb/Town & Postcode**

Korora NSW 2450



## Submission

The Department's proposed STRA legislation, conduct codes etc are fair to all parties and very much needed in NSW.

Prior to our 2016 relocation from Melbourne to the Coffs Coast, we had no experience of strata living and no exposure to STRA activities. We live in a beachside townhouse in a complex of 7 townhouses (KBay Townhouses, built late 2004) and hence, we now have strata living experience (some downsides). Previously, our townhouse was an 'up market' holiday let and until January 2018, two neighbouring townhouses were used exclusively as STRA (many downsides to our amenity).

Our exposure to living next door to STRA's gave us some insight to some issues associated with STRA activities which I'm uncertain whether the Department's proposed legislation will adequately cover and protect residents.

KBay's strata managers (SMS Coffs Harbour) were 'tipped off' that STRA activities at KBay were in breach of Council zoning laws and illegal. SMS submitted a complaint to Coffs Harbour City Council (CHCC). Eventually, after 4 months, the 2 STRA townhouses ceased holiday letting. This process for the other 5 KBay owners was unpleasant and we were exposed to financial risks. However, living at KBay is now so much better with no holiday letting activities.

During the referred STRA saga, I experienced dealings and issues with CHCC, KBay STRA owners, holiday letting estate agents, Airbnb and other parties. From these experiences, I would ask the Department whether the proposed STRA legislation will resolve the following issues:

1. Councils to be pro-active with adherence to their zoning laws and stop illegal STRA activity without having to wait for a registered complaint (apparently 200+ illegal STRA's presently operating on the Coffs Coast).
2. Managing agents and STRA platform operators to be held responsible for zoning legality of their STRA clients (Sunburst Holidays & Airbnb both advised me that they were not responsible!).
3. Neighbours to STRA's to be advised of STRA's owners, agents, platforms, contacts etc to sort out problems when they arise (we found it almost impossible to contact Airbnb).
4. No STRA activity in zoning areas where STRA isn't permitted and no exemptions.
5. STRA's within strata's compelled to advise the Owners' Corporation, the strata managers and the strata insurers of their activities and pay for additional insurance premiums and building damage caused by their STRA activities.

From our experiences, we would elect not to live in a complex which has STRA activity or, for that matter, live close to STRA properties.

Please contact me should you require additional information and/or clarification.

Kind regards

John Christie  
7/31 Sandy Beach Road, Korora, NSW 2450  
tel 0409 983 125

**I agree to the above statement**

Yes

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This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it immediately.

Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the NSW Office of Environment and Heritage.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 5:02 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Rob submission 3.0, non Air BNB run

Submitted on Wed, 11/09/2019 - 17:02

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

John

**Last name**

Evans

**Name withheld**

No

## Info

**Email**

[john@jcrearchitect.com](mailto:john@jcrearchitect.com)

**Suburb/Town & Postcode**

2060

**Submission**

The time period allowed for short term rentals allowed all year should be reduced to one week

**I agree to the above statement**  
Yes

I have lived in my apartment for more than 25 years and I am a past member of the building's managing board. I have often made submissions regarding development proposals in my neighbourhood, and this experience has convinced me that there is unnecessary and avoidable complexity in the planning instruments that govern development in NSW, and a complete lack of understanding of why we have planning.

### **General issues**

The NSW planning system is perhaps the world's most complex. Here we have proposal to make it yet more complex. A simpler framework for STRA would be far more effective.

### **Impacts on supply of affordable housing**

The Discussion Paper states that the STRA industry was estimated to be worth \$31.3 billion nationally. However, it overlooks some of the major costs. It completely overlooks the loss of affordable housing stock. To protect the supply of affordable housing, STRA should be prohibited in apartments in areas where it is in short supply. These areas are readily identifiable from the statistical reports of NSW Family and Community Services.

### **Impacts on jobs**

The Discussion claims that STRA creates jobs. However, most STRA is in areas where there are too many jobs (eg inner Sydney) and not enough workers because of the cost of housing and commuting. If in these job-rich areas there is a demand for STRA, then the construction of serviced apartments should be encouraged. Allowing STRA in apartment buildings in inner Sydney undermines the demand for serviced apartments and exacerbates the shortage of long-term rental accommodation.

### **Number of days rules**

All rules in terms of number of days are doomed to failure. How can they possibly be policed? Do we really want to live under the bureaucracy that would be needed to enforce these kinds of rules? Quite apart from these questions, the proposed number of days rules are so generous to STRA hosts that they would not reduce the adverse impacts of STRA.

There is a much simpler way to achieve the objective of reducing STRA impacts. STRA development should be a temporary use for a maximum of three years; after three years the premises must return to residential use, with no renewal of STRA use permitted for ten years. This would reduce impacts on the supply of rental accommodation (which number of days in a year rules do not) while still allowing STRA. It would also stop whole neighbourhoods being swamped by STRA.

### **"Exempt pathway"**

The exempt pathway is pointless because compliance with the development standards would be so poor. None of the many dwellings that I have been inside come close to meeting the proposed fire standards.

Under section 1.6 of the *Environmental Planning and Assessment Act*,

(2) Exempt development is development that is declared to be exempt development by an environmental planning instrument because of its minor impact.

The discussion paper admits that the impact of STRA is not minor. It cannot reasonably be argued that use of a dwelling unit for 180 or even 90 days would have minor impact.

The argument that a booking for 21 or more consecutive days has less impact than bookings for shorter periods confuses “booking” with “use”. It is not the “booking” that causes the impact, but the “use”. A 21 or more consecutive days rule would lead some hosts make ALL bookings for 21 days but allow occupants to leave after the days that they specified in their enquiry. In this way, a STRA unit could be used for 365 days in a calendar year.

Not allowing STRA as “exempt” development would mean a huge simplification in the regulatory framework. Indeed, even the proposed register would be unnecessary, because local governments would have copies of all the complying development certificates.

### **“Complying pathway”**

The complying pathway would work much better for STRA. It would ensure that the accommodation is fully compliant with all specified development standards.

To ensure that accommodation remains compliant with development standards, a complying development certificate should only remain valid for three years.

### **Proposed SEPP**

The Discussion Paper states that a new SEPP would be “the most workable solution for users of the policy”. The Discussion Paper gives no explanation of why this is so. It is not obvious that a new SEPP is better than amending the Exempt and Complying Development SEPP.

### **Proposed Environmental Planning and Assessment (Short-term Rental Accommodation) Regulation**

I struggle to understand why the content of the proposed Environmental Planning and Assessment (Short-term Rental Accommodation) Regulation could not be placed in the Environmental Planning and Assessment Regulation 2000. Requirements such as entry doors openable from the inside and for fire extinguishers and fire blankets in kitchens should apply to ALL Class 2 and 4 buildings.

### **State Environmental Planning Policy (Affordable Rental Housing) 2009**

It is not clear to me that affordable rental housing protected by the Affordable Rental Housing SEPP can be used for STRA. Certainly, it should not be permissible. It does seem odd that on the one hand there is an SEPP with an objective of facilitating the retention and mitigate the loss of existing affordable rental housing, and now another SEPP is proposed that will reduce the supply of affordable housing.

### **Environmental Planning and Assessment Act**

There is no discussion of amending the *Environmental Planning and Assessment Act*. A section should be added to Division 9.5 of the Act to cover STRA; STRA should be treated like backpackers accommodation and overseen by local governments in the same way.

### **Local Government Act**

There should be an amendment to s. 124 of the *Local Government Act* to ensure that local governments have full powers to curb nuisances arising from STRA. A core problem with the government’s proposals is that it largely ignores local government. In fact, it would encourage local governments to leave the management of STRA entirely to the state government.

10 September 2019

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Tuesday, 10 September 2019 11:51 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Tessa Submissions, recorded in DPIE subs register, Purple category

Submitted on Tue, 10/09/2019 - 11:46

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

John

**Last name**

Freeman

**Name withheld**

No

## Info

**Email**

[free.john@bigpond.com](mailto:free.john@bigpond.com)

**Suburb/Town & Postcode**

Sydney

**Submission file**

[new-regulatory-framework-for-short.pdf](#)

**Submission**

Please see uploaded submission

**I agree to the above statement**

Yes



**From:** John Hill <john\_hill10@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it is an effective way to allow others access to our holiday house (which is near a beach on the NSW Central Coast) when we are not using it. It provides cheap holiday accommodation which would not otherwise be available, and makes better use of housing resources.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

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- Respect the ancillary use of my home for home sharing

- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

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#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
John Hill  
437 Sailors Bay Rd  
Northbridge, Nsw 2063

**From:** no-reply@planning.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Tuesday, 20 August 2019 4:38 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category

Submitted on Tue, 20/08/2019 - 16:37

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

John

**Last name**

HINDE

**Name withheld**

No

## Info

**Email**

[jgh696@iinet.net.au](mailto:jgh696@iinet.net.au)

**Suburb/Town & Postcode**

Millers Point 2000

**Submission**

Hi Alex

Thank you for your letter. We all know how well "industry regulation" works. We have seen it in the local building practices where "self certification" has led to Opal Towers and the Mascot apartments with, no doubt, many more to come. Industry regulation in USA led th the GFC after Dubya deregulated Wall Street and Goldman Sachs gave the world CDOs (collateral debt obligations).

Of course there must be a register but a register run by the industry is no register at all.

Keep at the Government on this. They show every sign of being in the hands of big business to the detriment of the majority.

**I agree to the above statement**

Yes

-----  
-----  
This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it immediately.

Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the NSW Office of Environment and Heritage.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

**From:** John Howarth <158nf@comcast.net>  
**Sent:** Friday, 6 September 2019 11:54 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** recorded in DPIE subs register, Purple category

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens on our operations.

As a responsible operator, I support the creation of a cost-free register of all holiday rental properties listed on a platform and the code of conduct provided these do not add to my costs. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

In NSW we face very high costs, often imposed by governments such as land tax (my second biggest cost after mortgage interest), council rates, electricity, and gas (electricity and gas are included because government policy has caused their costs to skyrocket). Others include mortgage interest, maintenance caused by the severe conditions at our coastal location, and cleaning which in itself employs 3 people. I need higher revenue than 180 nights will provide, in order to cover these costs.

If a 180 night limit is arbitrarily imposed, I foresee that holiday rents will rise as property owners restrict their availability to high demand periods. The consequence of this is that with less supply in off-peak periods, there will be fewer properties available which will then raise their rents. At the same time, property owners will need to raise rents in peak periods such as school holidays in order to generate enough annual income to cover costs for the periods when this proposed policy will force vacancies.

There is an abundance of evidence that when governments have interfered with the free market, there are unintended consequences. Diminished supply and higher rents will be two of them.

Yours faithfully,

J.A. Howarth,

Azure on the beach,

Boomerang Beach NSW 2090

Email: [azure@optusnet.com.au](mailto:azure@optusnet.com.au)

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 1:34 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** recorded in DPIE subs register

Submitted on Wed, 11/09/2019 - 13:34

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

John

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Lazarus

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**Suburb/Town & Postcode**

Byron bay 2481

**Submission**

Totally opposed to the Draft - it is a malignant toxic proposal that will further destroy residential areas. If you wish to inflict commercial party houses on me, then I see no reason not to treat you to noisy 3 am

protests outside of your residence.

The proposals sabotage existing residential areas planning controls that restrict, but already allow, holiday accommodation in present Residential Living Zones to onsite managed DA advertised and Council authorised Bed and Breakfasts and Serviced Apartments, and will destroy existing authorised accommodation providers (which Council already gets few complaints about)

The proposals completely sabotage existing, and all projected State Government required, supply of residential premises - every state Residential Strategy would become invalid

The proposals will incite conflict between residents and tourists, with the likely result of violence, property damage and arson - residents have to get up early to work, and babies need to go to sleep early. Tourist accommodation can not co-exist 1 metre from residential bedroom windows.

With only 5 Council Compliance officers there is no capacity for Council to manage Compliance even on the existing 2,572 illegal, presently Local Environment Plan prohibited, criminal holiday letting business developments in Byron Bay. And no capacity to to manage compliance over the Proposals certain increase of these business parasites that are already destroying residential areas and who are the main cause of BYRON'S PRESENT SITUATION OF NO AFFORDABLE RESIDENTIAL ACCOMMODATION FOR WORKERS, PENSIONERS, STUDENTS, OR THOSE ON HEALTH OR UNEMPLOYMENT BENEFITS.

While Byron has one of the lowest per capita, and household, incomes in the State, turning residential houses into illegal Holiday Letting tourist accommodation business' has made the price of Byron houses to be the most expensive in the State - a complete breakdown of social justice and social coherence.

There is no basis for you to place me as the first responder to non compliance, including noise, parking etc, - I'll work out my own response which wont comply to your completely deficient compliance regime - I dont believe in violence, and would actively engage against it, but who would care if every one of the present 2,572 unauthorized unlawful Holiday Letting premises were burnt by arson to the ground - I wouldn't.

Either you act for all the community, or be rightly treated as failing to aquit your elected role, and be treated as an invalid body that has usurped your claim to be a democratically representative State Government.

Either you scrap this proposal or the public will move to shut these premises down, I have already raised the capacity with Council of using Councils Compulsory Acquisition powers to start buying these premises and turn them into social housing.

If you want to auspice these Residential Zone prohibited business, then resign from government and go and work for you criminal cohorts and put your defense of these presently illegal developers to the courts - you dont represent the residents of this State.

**I agree to the above statement**

Yes



# STRA Code of Conduct & Registration Feedback

Topic	Question
Planning instruments	<p>1. What is your view on the form of and provisions in the STRA SEPP, Regulation and Safety Standard?</p> <p>All dwellings –</p> <ul style="list-style-type: none"> <li>• Agree no more than 2 persons per bedroom / 12 persons per property.</li> <li>• Agree to smoke alarms</li> <li>• Don't agree with lighting of hallway unless it is part of the smoke alarm itself – overkill</li> </ul> <p>Multi unit –</p> <ul style="list-style-type: none"> <li>• Agree but believe that all external doors for ALL properties should be openable without a key internally</li> <li>• Agree but believe that fire extinguishers &amp; fire blanket in kitchen for ALL properties</li> <li>• Agree with evacuation signage</li> </ul> <p>Standalone dwellings</p> <ul style="list-style-type: none"> <li>• Agree with heat detector when garage is not accessible by guest and underneath the property</li> </ul>
	<p>2. Are there any elements of the draft instrument that are open to misinterpretation or require further clarification?</p> <p>No</p>
	<p>3. What are your views on new policy elements relating to days, flood control lots and bushfire prone land?</p> <p>Byron Shire Council (BSC) are proposing to reduce STRA to 90 days or less shire wide. BSC is required to prepare “a planning proposal to identify or reduce the number of days that non-hosted short-term rental accommodation may be carried out in parts of its local government area”, as per Ministerial Direction 3.7. They are putting forward via this submission process a request to reduce all holiday letting in Byron Shire to 180 days until such time as they prepare the planning proposal referenced above. They have not made any contact with any relevant parties in determining the impact that this will definitely have on the economy of the towns of the Shire. They are only focused on issues that are experienced in the town of Byron Bay, and not on the detrimental tourism &amp; economic impacts on the other towns eg. Brunswick Heads, New Brighton, South Golden Beach, Bangalow, etc..</p> <p>We agree with the restriction not being imposed in the Byron Shire, except if deemed necessary in Byron Bay itself, which leaves the number of lettable days at 365 days per year.</p> <p>Due to council's negative view on STRA as a whole, we have concerns around council's involvement when determining a properties complying development eligibility.</p> <p>We agree in principal with the flood &amp; fire safety requirements but need to determine the extent of the impact for our local area as we are surrounded by bush &amp; the majority of the Northern Rivers is flood susceptible.</p>

Code: Industry participants' obligations	<p>4. Are the general obligations for industry participants adequate? If not, what other general obligations should be considered? Why?</p> <p>Yes</p> <p>5. What types of STRA information will be useful for the Secretary to collect to inform the further improvement of the Code and the STRA regulatory framework? Why?</p> <p>The Secretary could ask for a copy of participants complaint registers to determine the type &amp; extent of complaints experienced to date.</p> <p>Ours, for example, will show how little of a problem the North Byron Shire is experiencing.</p> <p>6. Are the specific obligations on booking platforms, letting agents, hosts, guests and facilitators in the Code adequate? If not, what other obligations should be considered for each of these industry participants? Why?</p> <p>Yes in relation to guests, booking platforms &amp; letting agents.</p> <p>We do not agree with Hosts having to have insurance that covers the Guests &amp; their visitors belongings. How can a host be liable if a guest leaves the front door open and something is stolen, for example? This surely falls under travel insurance</p>
Code: Complaints	<p>7. Is the complaints process detailed in part 6 of the Code sufficient? If not, what other matters should be considered or set out in the process? Why?</p> <p>No</p> <p>All complaints must go to the host / letting agent first in order to be given the opportunity to rectify any concerns within a reasonable amount of time. If the issue continues to be a problem, this is when the Commissioner should become involved.</p>
Code: Compliance and Enforcement	<p>8. Are the grounds for recording a strike fair and reasonable? What other matters (if any) should the Commissioner consider when deciding whether to record a strike? Why?</p> <p>Yes, in theory. However, we have concerns around what determines whether the complaint is legitimate. And how whether the expectations of a guest is realistic when viewing a property online, for example, as opposed to actually viewing the house in person. It is understood that a property can not be misrepresented but still at times a persons perception may differ from what is reality</p> <p>Another concern we have is if person A is on the exclusion register so they get person B to make the booking. When taking bookings we only enter 1 persons details, not all the parties that will be holidaying in the property.</p> <p>9. What are potential ways to facilitate industry participants' access to the exclusion register while limiting potential privacy impacts? What factors should be considered?</p> <p>All participants hold a registration number. These numbers are checkable on the register. This number will advise whether the participant is excluded without providing any personal information.</p> <p>10. Is the review process clear and sufficient? What other matters (if any) should be considered? Why?</p> <p>Yes</p>

Code: Penalty notice offences and civil penalties	<p>11. Are the proposed penalty notice offence and civil penalty provisions appropriate? What provisions should or should not be identified as penalty notice offence and/or civil penalty provisions? Why?</p> <p>We find the penalties rather excessive. This is a holiday letting industry – it does not involve serious infractions like Trust Account fraud.</p>
Amendment Regulation: Prescribed classes of STRA industry participant	<p>12. Does clause 22B(1) appropriately capture end to end property management services that specifically service STRA properties? Why or why not?</p> <p>Yes</p> <p>13. What other organisations or persons should be prescribed classes of STRA industry participants (if any)? Why?</p> <p>None</p>
Amendment Regulation: STRA industry participants excluded from Code of Conduct	<p>14. Is it appropriate to exclude the STRA industry participants set out in clause 22C? Why or why not?</p> <p>Yes</p> <p>15. What other STRA operators (if any) should be excluded from being covered by the Code? Why?</p> <p>None</p>
Amendment Regulation: Appeals against listing on exclusion register	<p>16. Is the appeals process clear and sufficient? What other matters (if any) should be considered? Why?</p> <p>Yes</p>
Amendment Regulation: Fees and cost recovery	<p>17. Which industry participants should contribute to the cost of administering and enforcing the Code? Why?</p> <p>The Guest</p> <p>18. How should costs be apportioned across different STRA industry participants? Why?</p> <p>Registration Fee – for Guest to register</p> <p>Registration Fee – for property to register</p> <p>Administration Fee – per booking, per property paid for by Guest</p>
Amendment Regulation: Penalties	<p>19. Is the proposed penalty notice offence amount appropriate? Why or why not?</p> <p>Excessive for a first offense. Maybe it would be more appropriate to determine the penalty amount around a certain % of the booking amount that it relates to</p>
Proposed industry-led property register	<p>20. How can industry be organised to develop and manage the registration system?</p> <p>Through a STRA committee of relevant parties eg. Those listed on Appendix 2</p> <p>Those that should not be part of the STRA committee include local council members.</p> <p>21. What would be the costs to industry in establishing and maintaining the register? How would industry propose to meet these costs?</p> <p>Registration Fee – for Guest to register</p>

<p>Registration Fee – for property to register</p> <p>Administration Fee – per booking, per property paid for by Guest</p>
<p>22. What role should the Government play in developing or overseeing the register, if any?</p> <p>They should have a State Govt representative in the STRA committee mentioned in question 20 above</p>
<p>23. Are there other outcomes a register should deliver?</p> <p>No</p>
<p>24. How can the approach ensure registration applies to all STRA operators, regardless of how the property is advertised for rent?</p> <p>Determined by the STRA Committee</p>
<p>25. What audit and verification processes would be needed to ensure accuracy of data?</p> <p>Determined by the STRA Committee</p>

<p>26. Should there be separate or additional penalties for failure to register? If so, which industry participants should they be imposed on?</p> <p>No, covered in penalties above</p>
<p>27. What information should the register collect? Why?</p> <p>Agree – name &amp; contact details of host</p> <p>Agree – address of property</p> <p>Do not agree – it should be number of days the property is actually stayed in – <b>bookings</b> can be cancelled.</p> <p>Do not agree – that should already have been determined regarding strata compliance, by laws &amp; STRA</p> <p>Agree – but breach information should not be viewable by general public; only whether they are excluded or not</p> <p>Also on the register should be Guest name &amp; contact details</p>
<p>28. What role should different industry participants (e.g. hosts and booking platforms) play in the registration process?</p> <p>None – only once place / site to register</p>
<p>29. What role should Government play in the registration process or providing information for the register?</p> <p>None</p>
<p>30. Should any information on the register be made publicly available? If so, what information could be made available and why?</p> <p>Only whether a participant is excluded or not</p>
<p>31. Should industry be required to report registration information, including number of stays (days), to Government and/or local councils? If so, how frequently? Why?</p> <p>Not directly. They can refer to the register</p>

	<p>32. Should any information on the register be made publicly available? Why?</p> <p>Same question as 30</p>
Commencement of regulatory framework	<p>33. How much lead time would industry need to develop and establish the proposed STRA property register? Please provide reasons.</p> <p>Councils should have to apply for any request to limit number of days a holiday property is lettable prior to the establishment of the STRA register &amp; the regulatory framework.</p> <p>Holiday home owners will need to determine the viability of continuing to holiday let with the reduction in income &amp; costs associated with the compliance of the Code if the number of days a property can be let are reduced from 365.</p> <p>34. When should the STRA regulatory framework start? Please provide reasons.</p> <p>Refer question 33</p>
12-month review of regulatory framework	<p>35. Do you support the proposed scope of the review? What additional considerations might be necessary?</p> <p>Yes</p> <p>36. What data sources could the NSW Government use to inform the review? How can industry and councils assist with data collection for the review?</p> <p>Voluntary submissions from participants &amp; / or surveys issued to registered participants.</p>

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 3:20 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** rob submission 2.0, non Air BNB run

Submitted on Wed, 11/09/2019 - 15:18

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

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**Suburb/Town & Postcode**

Bardon 4065

**Submission file**

[stra-code-of-conduct-and-registration-feedback.pdf](#)

**Submission**

I have made my submission in the attached submission file.

**I agree to the above statement**

Yes

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Monday, 9 September 2019 1:55 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** recorded in DPIE subs register, Purple category

Submitted on Mon, 09/09/2019 - 13:55

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

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**Suburb/Town & Postcode**

Potts Point



**Submission**

Dear Sir/Madam,

I would like to recommend that the point in "Table 2: Proposed safety requirements applying to dwellings used for STRA - No more than 2 persons/bedroom or 12 persons, whichever is the lesser." be reviewed with consideration for families and/or budget travellers in mind, as well as operators within the Short Term Rental Market industry.

I suggest that the above point is overly restrictive and doesn't take into consideration the size of the property.

To provide a real case scenario: my company currently operates Regents Court Sydney. Regents Court Sydney is a collection of 35m2 studio apartments designed for 2-4 people in each studio apartment. Regents Court has been operating as a hotel since the early 90's, catering for a diverse range of clientele. When the building was sold off to individual owners, a majority of the new owners wanted to continue short-term renting their apartments and have done so ever since. Compared to other studio apartments in our suburb our 35m2 apartments are considered larger and spacious.

We have a considerable amount of family travellers who require their children to stay in their room with them, as they are too young to be in another room on-their-own.

Limiting a studio apartment to 2 person capacity would not only hinder operators across NSW just like me, but would also limit the options available for travelling families and budget conscious travellers right across New South Wales, perhaps diluting the amount of these types of tourists from visiting New South Wales.

Please refer to my attached image, an example of a bedding configuration for more than 2 people within a studio apartment.

Kindest,

John McCrea  
02 9331 2099  
john@regentscourtsydney.com.au

**I agree to the above statement**

Yes

**SP 96847 Vance at Harold Park –  
1 Cullen Close, Forest Lodge NSW 2037  
Final Submission on  
Short-Term Rental Accommodation (STRA) - A New Regulatory  
Framework Discussion Paper August 2019**

The following responses relate to the questions posed in the discussion paper. They are made from an Owner's Corporation for a Strata Scheme perspective, and represent the view of the current Strata Committee. SP 96847 is a high rise residential apartment complex comprising approximately 220 apartments, located in the City of Sydney. Responses are not made to every question.

***Q1. What is your view on the form of and provisions in the STRA SEPP, Regulation and Safety Standard?***

**a. SEPP**

The form of the SEPP Is generally acceptable.

For comments on provisions for day limits and 21 day provision please see Q3. below.

**b. EPA Regulation**

Generally acceptable, except as above.

**c. Safety Standard**

We strongly support the proposed fire safety requirements, especially the 2 persons/bedroom limit. People using STRA should have the same safety expectations as in a hotel. We also strongly support the requirement for neighbour notification, registration with strata (if applicable) and for hosts to notify guests of relevant by-laws.

However in a multi-unit building, it should also be a requirement that the Evacuation Plan be consistent with that applying for the whole building and it should be displayed inside the apartment.

***Q2...Are there any elements of the draft instrument that are open to misinterpretation or require further clarification?*** <sup>[SEP]</sup>

We require further clarification of terms 'exempt', 'complying', 'host principal residence', 'host residing during provision of the service' and mixtures of the above. For example, what if a host is sometimes resident and sometimes not, or if hosts may shift categories to get around the STRA regulations or strata by-laws?

We are concerned that un-hosted STRA can falsely claim to be hosted to get around the day limit or that hosts can misrepresent day stay data to elude limits especially if some bookings are not through an agency.


The terms “non-hosted” and “un-hosted” need to be reconciled and standardised in the various instruments and Code. One term only please.

The draft instruments need to be clarified for alignment with the Strata Schemes Management Act Section 137A (not yet in force). The draft instruments use the terms “hosted” and “non-hosted” short term rental accommodation (STRA). Section 137A is based on the “principal place of residence”. Section 137A should define the term “principal place of residence” equivalent to the new definition of “hosted” STRA, as defined in the draft instruments.

The associated Strata Schemes Management Act Section 137A (not yet in force) should also require a special resolution for any future amendment and removal of STRA related by-laws (for consistency.)

Is the owner of the premises able to determine if a tenant can sub-let for the purpose of STRA? If this is not clear it should be covered to provide certainty.

The instruments should not invalidate existing SP 96847 by-laws relating to STRA that were introduced under the current Strata Schemes Management Act, which in the case of SP 96847 are understood to be based on the City of Sydney Development Approval for our building. The SEPP and EPA Regulation should not invalidate the approved Development Consent for our building.

***Q3. What are your views on new policy elements relating to days, flood control lots and bushfire prone land?*** 

#### **a. Day limits**

We believe the City of Sydney and beachside suburbs of Sydney warrant a day limit of 90 days, rather than 180 days, being the same threshold the Minister for Planning on 11 February 2019 has invited Byron Shire Council to introduce, on the same grounds “in response to the high concentration and unique impacts of STRA” on most parts of these areas within Greater Sydney.

As a general comment on the 180 day limits, when a normal contingency for say 50% vacancies is allowed for, this means effectively that a nominal day limit of 180 days actual booked days equates to effective year-round usage of the apartment.

#### **b. 21 day provision for un-hosted STRA**

We are concerned that un-hosted STRA can use the 21 day provision to undertake full-time STRA leasing. This type of STRA may be agreed to outside booking agency systems and so may be hard to prove or disprove. Additional use creates significant wear-and

tear on common property and creates considerable potential for inconvenience to neighbours.

It is stated that the proposed 21 day exemption reflects feedback that longer bookings tend to have fewer amenity impacts and are a key support to a mobile workforce. This is hardly relevant to the Greater Sydney metropolitan situation compared to Regional areas. Hence this provision should not apply in

In the case of SP 96847 whilst there is some benefit to having reduced turnover and movement of people in and out of the building for longer bookings, the 21 days brings a major overall disadvantage due to the solid usage of lifts, wear and tear of common areas, car parking, garbage and noise – at a usually greater intensity compared to a normal long-term residency.

We therefore recommend that the 21 day limit be

- (a) abolished completely for Greater Sydney (preferred); or
- (b) increased to at least 28 days to reduce wear and tear to common property and neighbour inconvenience.

***Q4. Are the general obligations for industry participants adequate? If not, what other general obligations should be considered? Why?***

The general obligations are inadequate but should at least be extended to include:

All industry participants must act honestly **and promptly and transparently** and in good faith.

***Q5. What types of STRA information will be useful for the Secretary to collect to inform the further improvement of the Code and the STRA regulatory framework? Why?***

The number of days actually booked for each STRA will be essential information.

Information needs to be kept to track whether hosts are switching between hosted and non-hosted categories to get around day limits for an individual property.

***Q6. Are the specific obligations on booking platforms, letting agents, hosts, guests and facilitators in the Code adequate? If not, what other obligations should be considered for each of these industry participants? Why?***

Generally, the obligations are inadequate.

Booking platforms and letting agents should have additional “**Obligations to Owners Corporation**” as follows:

They must inform the Owners Corporation of the details of any hosts within the building being marketed by them.

Hosts should have additional “**Obligations to Owners Corporation**” as follows:

In particular, a host must be held responsible to the Owners Corporation for any breaches of the by-laws or damage or issues relating to the building by the actions of their guests.

The Owners Corporation needs to be able recover from hosts any additional or increased costs due to the use of a lot for STRA. For example: additional costs could be due to fire safety upgrades, increased maintenance due to traffic, usage of facilities, regular move in, move out with luggage, and insurance.

An additional obligation for hosts that should be considered is the secure handling of the access method for the premises used for non-hosted STRA. Strata schemes security for access to common areas should not be reduced by arrangements made by the host.

A host must also give guests details of the **strata building manager** (in multi-unit complexes).

***Q7. Is the complaints process detailed in part 6 of the Code sufficient? If not, what other matters should be considered or set out in the process? Why?***

Generally acceptable.

***Q8. Are the grounds for recording a strike fair and reasonable? What other matters (if any) should the Commissioner consider when deciding whether to record a strike? Why?***

Generally acceptable, however there needs to be some clarification over what is considered “not minor” (cl. 7.1.3 (a) and (c))

***Q9. What are potential ways to facilitate industry participants’ access to the exclusion register while limiting potential privacy impacts? What factors should be considered?***

Information on exclusions register should be readily available to guests, neighbours and strata managers. This is critical information for the Owners Corporation, in a community living setting.

Therefore, there are strong grounds for it to be publicly –available. This will also assist transparency of the STRA industry.

***Q10. Is the review process clear and sufficient? What other matters (if any) should be considered? Why?***

There is a risk that if the review process is abused, the Secretary will be snowed under with reviews. There should be some limits on scope of permitted reviews.

***Q11. Are the proposed penalty notice offence and civil penalty provisions appropriate? What provisions should or should not be identified as penalty notice offence and/or civil penalty provisions? Why?***

For effectiveness, the penalty system will depend on adequate resourcing of the Department to bring cases to court.

Serial offenders e.g. Airbnb “superhosts” should have higher penalties applied.

***Q12. Does clause 22B(1) appropriately capture end to end property management services that specifically service STRA properties? Why or why not?*** [SEP]

The term ‘persons who provide property management services’ could be construed to include the Owners Corporation, Strata Manager and Building Manager if a lot in a strata scheme is being used for STRA. If they are included, then any increased compliance costs should not be incurred by the Owners Corporation in general. Costs related to STRA should be able to be allocated to lots providing STRA.

Consequently, the Owners Corporation, Strata Manager and Building Manager should be specifically excluded from the scope as they do not intentionally provide STRA services.

***Q13. What other organisations or persons should be prescribed classes of STRA industry participants (if any)? Why?*** [SEP]

No comments.

***Q14. Is it appropriate to exclude the STRA industry participants set out in clause 22C? Why or why not?***

No comments.

***Q15. What other STRA operators (if any) should be excluded from being covered by the Code? Why?***

No comments.

***Q16. Is the appeals process clear and sufficient? What other matters (if any) should be considered? Why?***

No comments.

***Q17. Which industry participants should contribute to the cost of administering and enforcing the Code? Why?*** <sup>[L]</sup><sub>[SEP]</sub>

We consider that the booking platforms and letting agents and end-to-end property management services and hosts should bear these costs, and certainly not the Government.

***Q18. How should costs be apportioned across different STRA industry participants? Why?*** <sup>[L]</sup><sub>[SEP]</sub>

No comments.

***Q19. Is the proposed penalty notice offence amount appropriate? Why or why not?***

The penalty notice offence amount of \$550 seems too light for booking platform and letting agent offences.

***Q20. How can industry be organised to develop and manage the registration system?***

No comments.

***Q21. What would be the costs to industry in establishing and maintaining the register? How would industry propose to meet these costs?*** <sup>[L]</sup><sub>[SEP]</sub>

No comments.

***Q22. What role should the Government play in developing or overseeing the register, if any?*** <sup>[L]</sup><sub>[SEP]</sub>

The Government needs to conduct regular, random audits of day stay data, accuracy of whether STRA is categorised as hosted or unhosted and whether fire safety standards are being adhered to.

The whole integrity of the Code of Conduct system for compliance will only work if the Register data is accurate and timely. Therefore, the Government should mandate compliance of the Register for data accuracy and timeliness of data and with essential statistical reporting requirements. The Government should have full access to the Register and continually audit the integrity and timeliness of information in the Register. If the Register is found to be ineffective then the STRA industry should be held to account with further restrictions on it and increased Government regulation. All costs of monitoring compliance should be recovered from the STRA industry.

***Q23. Are there other outcomes a register should deliver?***

No comments.

**Q24. How can the approach ensure registration applies to all STRA operators, regardless of how the property is advertised for rent?** <sup>[L]</sup><sub>[SEP]</sub>

No comments.

**Q25. What audit and verification processes would be needed to ensure accuracy of data?** <sup>[L]</sup><sub>[SEP]</sub>

No comments.

**Q26. Should there be separate or additional penalties for failure to register? If so, which industry participants should they be imposed on?** <sup>[L]</sup><sub>[SEP]</sub>

Yes. Penalties here should fall on those profiting from STRA, i.e. booking platforms, letting agents and end-to-end property management services and hosts.

**Q27. What information should the register collect? Why?** <sup>[L]</sup><sub>[SEP]</sub>

Among other things, the Register should record whether host is present or not so that the number of days available for STRA can be determined, especially where host status changes.

The listings in the Register need to have mandatory address information sufficient to properly identify the property or lot (in multi-unit complex). In the latter case, street address is insufficient, the unit number or lot number is also required.

The STRA industry does not have a good record for transparency.

For the Register to be effective, it MUST NOT be left to industry participants to record the following:

- **If in a strata building, whether STRA complied with the bylaws** <sup>[L]</sup><sub>[SEP]</sub>  
Owners Corporations need to have direct access to the Register and be able to populate it for by-law compliance/breaches.
- **Records of any breaches, enforcement action or 'strikes'**  
Government needs to have direct access to the Register and be able to populate it for these.
- **Confirmation that the host or property is not listed on the exclusion register.** <sup>[L]</sup><sub>[SEP]</sub>  
Government needs to have direct access to the Register and be able to populate it for listings on the exclusion register. <sup>[L]</sup><sub>[SEP]</sub>



**Q28. What role should different industry participants (e.g. hosts and booking platforms) play in the registration process?** <sup>[L]</sup><sub>[SEP]</sub>

No comments.

**Q29. What role should Government play in the registration process or providing information for the register?** <sup>[L]</sup><sub>[SEP]</sub>

The Government should police and regularly audit the register, as discussed under Q22 above.

The Government should populate the Register for certain information as discussed under Q27 above.

**Q30. Should any information on the register be made publicly available? If so, what information could be made available and why?** <sup>[L]</sup><sub>[SEP]</sub>

Yes, absolutely. All information should be made publicly available, as this is a commercially profitable yet high impact industry with a poor record of performance and poor transparency.

In particular, Owners Corporations need to see all data relating to compliance.

Otherwise the STRA industry will be operating in secrecy and unaccountable to the public interest.

**Q31. Should industry be required to report registration information, including number of stays (days), to Government and/or local councils? If so, how frequently? Why?** <sup>[L]</sup><sub>[SEP]</sub>

As argued above, the Government should have direct real time access.

Reporting to Councils could be monthly, to keep Councils informed about STRA industry performance in their area.

**Q32. Should any information on the register be made publicly available? Why?** <sup>[L]</sup><sub>[SEP]</sub>

Same question as Q30.

**Q33. How much lead time would industry need to develop and establish the proposed STRA property register? Please provide reasons.** <sup>[L]</sup><sub>[SEP]</sub>

Surely industry could develop the Register in 6 months, since it will largely be built off existing STRA booking platforms and databases.

***Q34. When should the STRA regulatory framework start? Please provide reasons.***

[1]  
SEP]

1 January 2020, because it is already well overdue and the need for corrective action on STRA is highly urgent. Furthermore, the Fair Trading Amendment (with related Section 137A in SSM Act) was passed by Parliament in 2018.

Our SP 96847 is urgently awaiting resolution of the STRA framework in order to clarify the way forward with managing acute STRA problems in our own building.

The suggested stage implementation of the framework at 1 Jan 2020, with Register say 1 July 2020 would be acceptable.

***Q35. Do you support the proposed scope of the review? What additional considerations might be necessary?***

[1]  
SEP]

Yes, this is generally acceptable, although it is important that it not be considered an opportunity for STRA industry to water down the key obligations and requirements.

Realistically, given the nearly 2 years taken to develop the framework, a 24 months timing for the review is considered appropriate, rather than 12 months.

***Q36. What data sources could the NSW Government use to inform the review? How can industry and councils assist with data collection for the review?***

[1]  
SEP]

No comments.

Signed

John McPhail

Secretary, Strata Committee, SP 96847

11 September 2019

END OF SUBMISSION

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 5:01 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Rob submission 3.0, non Air BNB run

Submitted on Wed, 11/09/2019 - 16:52

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

**First name**

John

**Last name**

McPhail

**Name withheld**

No

## Info

**Email**

[jmcphail1955@gmail.com](mailto:jmcphail1955@gmail.com)

**Suburb/Town & Postcode**

Forest Lodge 2037

**Submission file**

[sp-96847-stra-submission---final-11-sep-2019.docx](#)

**Submission**

The attached submission Word document file represents the views of the Strata Committee of Strata Plan 96847 Vance at Harold Park, a large apartment complex comprising approximately 220 apartments, within the City of Sydney.

The submission addresses each question in the STRA Discussion Paper, with "no comments" for some questions.

We would appreciate an opportunity to discuss or clarify any of the issues raised in our answers to the questions.

Please note, SP 96847 has by-laws relating to STRA that we understand directly relate to the approved Development Consent for the building, which provisions we were required by the City of Sydney to include in our by-laws. Obviously we are concerned to clarify the current legal status of these by-laws and our approved Development Consent.

Prepared by John McPhail, Secretary, SC, SP 96847

**I agree to the above statement**

Yes

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Tuesday, 10 September 2019 10:57 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Tessa Submissions, recorded in DPIE subs register, Purple category

Submitted on Tue, 10/09/2019 - 10:56

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

**First name**

John

**Last name**

Morris

**Name withheld**

No

## Info

**Email**

[jmorris9949@gmail.com](mailto:jmorris9949@gmail.com)

**Suburb/Town & Postcode**

Surry Hills 2010

**Submission**

I/we fully support the related submission by the Owners Corporation Network of Australia Pty Ltd. Further, I/We believe that the proposed legislation lacks oversight with regard to the rights of the Owners Corporation, lacks remedies for enforcement breaches.

**I agree to the above statement**

Yes

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Monday, 9 September 2019 10:52 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Submitted on Mon, 09/09/2019 - 10:51

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

John

**Last name**

O'Grady

**Name withheld**

No

## Info

**Email**

[jmogrady@optusnet.com.au](mailto:jmogrady@optusnet.com.au)

**Suburb/Town & Postcode**

Sydney

**Submission**

I live in a CBD high-rise building, where short term letting is strongly rejected by the residents and as a

consequence we have a BY-Law prohibiting such activity. We are all living in our homes with NO commercial activity and as such I strongly resent the State Government telling me what I can and cannot do in my home with regard to short term letting while the said government bows to the wishes of a minority and AirBnB

Stay out of our lives and let us run our Building as we, the owners, see fit

**I agree to the above statement**

Yes



**From:** no-reply@planning.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Thursday, 22 August 2019 2:16 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Submitted on Thu, 22/08/2019 - 02:15

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

John

**Last name**

O'Grady

**Name withheld**

No

## Info

**Email**

[jmogrady@optusnet.com.au](mailto:jmogrady@optusnet.com.au)

**Suburb/Town & Postcode**

Sydney

**Submission**

I cannot understand why the State Government is dictating to an Owners Corporation as to how the OC runs their building. Surely the OC has the right to decide how the building is run, and if there is

overwhelming opposition to short term letting,a decision to ban same should be accepted by the State Gov. or any other body.I note that the City of Sydney Council has no interest in enforcing Development Consents,so why is the State Government so quick to enforce an OC to comply with their proposed regulations.Please State Government leave us alone to run our own building according to the majority of owners wishes

**I agree to the above statement**

Yes

-----  
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This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it immediately.

Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the NSW Office of Environment and Heritage.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

**From:** John Peterson <djkiwa@bigpond.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it helps us stay in our own home .

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
John Peterson  
3 Kiewa Cl  
Bayview, Nsw 2104

**From:** john phegan <jmjp1@bigpond.com>  
**Sent:** Wednesday, 11 September 2019 2:20 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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Thank you for reading my submission.

Regards,  
john phegan  
545 Glenellen Rd  
Glenellen, Nsw 2642

**From:** John Price <jprice96@bigpond.com>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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Environmental Planning and Assessment (STRA) Regulation 2019

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Thank you for reading my submission.

Regards,  
John Price  
13 Monmouth St  
Stockton, Nsw 2295



**From:** John Schwenn <ashbyfolk@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it gives us a small boost of income to our pension which is not saved but used or pay increasing living, service and power costs, for example, this year our septic system service fee (a NSW government requirement) rose by 10.%, an insurance fee increased by 40%

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

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Specifically, I want to comment on the following:

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Environmental Planning and Assessment (STRA) Regulation 2019

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- Respect the ancillary use of my home for home sharing

- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

#### STRA Property Register

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Thank you for reading my submission.

Regards,  
John Schwenn  
3 Ashby St  
Ashby, Nsw 2463

# **Submission to NSW Government on Policy and Code of Conduct for Short Term Rental Accommodation. The Department of Customer Service and Department of Planning, Industry and Environment.**

Submitted by Dr J. C. and K. J. Scott  
Milsons Point, NSW 1565

**Background:** This submission is the product of first-hand experience living in an apartment block very close to the CBD of Sydney which was originally built as owner occupied and long term leased 2-3 bedroom apartments and does **not** have Council consent to operate as short term let serviced apartments.

Today several apartments in our building are illegally operating as serviced apartments. Our local Council has never given consent for operation as serviced apartments with a lease period less than 3 months and have issued a 'cease and desist' letter to the Owners Corporation, which has been distributed to all owners and key agents, which has been ignored by several owners and/or their agents.

The internet has provided an extremely efficient and effective means of advertising accommodation, both long term and short term. The new generation of smart device based advertisers such as AirBnB have absolutely no relationship with the owners of the property they advertise, or other occupants. They are very much hands off, and simply take a hefty commission for a very effective advertising experience.

Local real estate agents often provide a service to owners in the same way AirBnB does, but their more detailed local knowledge and personal service make their advertising even more effective, even though it might be to a smaller client base. In many cases they advise owners to short term rent, even though it may be illegal, and possibly not in the owner's longer term financial interest. The latter is a result of vested interests of the agent who is driven by the higher than normal fee from short term rentals, even though the owner may receive an overall return similar to that for long term rental (due to the often lower occupancy rate).

The responsibility for operating within the law lies with the owner and generally agents disassociate themselves with any legal responsibility as they claim they are simply acting on behalf of owners. One arrangement in our building appears to be an exception – the owner (legally) leases to the real estate agent for 12 months and the agent (illegally) short term lets (3 days minimum). Who is breaking the law in this instance?

With the current efficiency and ready access to the WEB for both agents and potential clients there is very little difference between traditional accommodation providers and online platforms – they are now one and the same. The real issue is that both traditional and online managing agents have

identified the increased profits to be made from managing short term holiday rentals, even if the owners, and certainly any longer term renting or owner occupying neighbours do not see any advantages, and for the latter many distinct disadvantages

A building in an area zoned residential or where council has not provided consent for STRA the default should be no STRA including no 'day limits'. STRA should only be allowed where owners vote, as a Special resolution, to allow STRA in their building.

There is no doubt the proliferation of short term rentals, often illegally conducted where Council has not provided consent or where the zoning is residential, is changing the character of the market. In our area we have seen at least one major hotel, and several commercial buildings converted to high rise residential accommodation.

The apparent shift from Hotel style to longer term rentals is not what it might appear as many of these new dwellings will be advertised as short term serviced apartments and effectively take the place of the conventional hotel supplied beds – in many cases without the safeguards and protections for tenants from legislation that has come with many years of experience with this type of accommodation. This shift will continue even though the infrastructure of the new building may not necessarily meet the legislative requirements of the hotel style serviced apartments they replace.

A code of conduct may help control behaviour where STRA is permitted but when owners buy into a building they expect the zoning and any Council consent or otherwise to be recognised and adhered to by the building owners. If it isn't they should expect that Councils will enforce the conditions they impose and legally force Owners to abide by the law through court orders.

Our personal experience over the last 2-3 years is that Councils, for many reasons, find it difficult to enforce their DA conditions with action, and agents and owners alike thumb their noses at anyone expecting the law to be enforced. In our particular situation, approaches to the Office of Fair Trading, the local Council, and Law Access NSW (legal Aid) have all failed to stop the illegal operation of lot owners.

The conduct of owners and their agents who thumb their noses at the law and continue to operate illegally create a number of very significant issues for other owners in their building. Buildings are designed and built under an approved Development Application (DA) which ensures the appropriate infrastructure exists to support the approved type of accommodation.

Traditional short term accommodation, such as hotels, motels, guesthouses etc have stringent legislated requirements for guest safety, eg fire exit signage, disabled access, and the presence of onsite managers, concierge etc. There are very different requirements for traditional longer term accommodation buildings which are built to a different classification.

The class of building is a key factor in its approval and, as an example, the fire systems within the building vary considerably between different classes. Many owners do not realise that the implications of illegally operating serviced apartments may include voiding their (and their neighbour's) insurance.

An insurance policy designated for residential accommodation makes certain assumptions about included infrastructure, if, to continue the example above, the fire services are not at the more stringent level required for serviced accommodation then an insurance policy may not provide the cover an owner might expect, or may be altogether void.

If Councils do not take the legal steps to enforce their determinations, another body (such as the Office of Fair Trading or a new body) should be tasked with this responsibility.

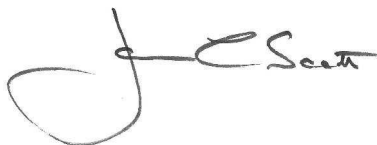
When an owner, in their pre purchase inspection, is informed by Council that consent has not been granted for short term rentals in their building, they should not expect to see a hotel style service cart and to battle suite-case wielding tenants day after day in their foyer and lifts, and more importantly discover their insurance policy does not fully cover their building. But this is what is happening to us – and will continue to happen across the state unless something more significant than implementing a code of conduct.

The NSW State Government encourages older residents or 'empty nesters' to down size their homes and this often means selling a larger house and moving into Strata accommodation. This encouragement has significant financial elements and is a logical way to provide for the accommodation of growing families where the availability of larger houses is limited (in areas such as Sydney). The last thing an elderly resident who is downsizing to a strata building wants is to find they have moved into a building that is operating more like an hotel than a home – this is what happened to the undersigned.

When an owner has done their homework and confirmed that serviced apartments are not permitted in their building this should be enforced and it should not be easy for other owners to change these conditions. Any change should require a Special Resolution (under any NSW Strata Schemes Management Act) and therefor 25% of owners may reject such a change – this needs to be specifically imbedded into the ACT or any new legislation.

In general, even though it is a 'legal' document an Act such as the *Strata Schemes Management Act 2015* should be unambiguous and clear in its meaning to an educated person, it should also not be silent on key issues, and should not require a legal interpretation to implement.

The number of Strata based apartments in NSW is growing rapidly, the issues being raised today are significant but are the tip of the iceberg that will exist only a few years from now if no action is taken.



J.C Scott  
6th September 2019



K.J Scott

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Tuesday, 10 September 2019 10:49 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** recorded in DPIE subs register

Submitted on Tue, 10/09/2019 - 22:45

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

John

**Last name**

Scott

**Name withheld**

No

## Info

**Email**

[chris.scott@iinet.net.au](mailto:chris.scott@iinet.net.au)

**Suburb/Town & Postcode**

Milsons Point 2061

**Submission file**

[submission-to-nsw-governmentseptember2019.pdf](#)

**Submission**

Please find submission attached.

**I agree to the above statement**

Yes

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Saturday, 7 September 2019 10:42 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** recorded in DPIE subs register, Purple category

Submitted on Sat, 07/09/2019 - 10:41

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

John

**Last name**

Selby

**Name withheld**

No

## Info

**Email**

[jselby1937@gmail.com](mailto:jselby1937@gmail.com)

**Suburb/Town & Postcode**

LITTLE BAY



**Submission**

I support the framework that has been proposed by OCN

**I agree to the above statement**

Yes

**From:** no-reply@planning.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Friday, 23 August 2019 8:11 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category

Submitted on Fri, 23/08/2019 - 08:10

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

john

**Last name**

shannon

**Name withheld**

No

## Info

**Email**

[shirazmerlot@hotmail.com](mailto:shirazmerlot@hotmail.com)

**Suburb/Town & Postcode**

2500

**Submission**

I think Air BNB and these other short term rental platforms are a bad idea for almost everyone not directly involved in the transaction - ie everyone excluding the parent company - which will pay no tax in Australia, the owner - who will make 2-3 times as much money as from a regular rental and the people paying for the rental. It is particularly corrosive in apartments and other situations where "wear and tear and security concerns" are very real and cannot be adequately addressed or compensated under the existing framework.

I would agree for Air BNB and the other horrid "don't pay tax in Australia companies like Uber" if they did pay tax at Australian company rates and their activities were restricted only to private residences, that punitive noise pollution fines, parking fines etc were put into place to protect neighbours, and that they could only be used in apartment blocks etc if 80% of the owners agreed - AND a mechanism is in place to compensate for wear and tear and address security concerns.

yours

j shannon

**I agree to the above statement**

Yes

**From:** John Smith <smith94@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
John Smith  
450 Elizabeth St  
Surry Hills, Nsw 2010

**From:** John Trotter <johntrotter@iinet.net.au>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because we wish to be self-funded in retirement and to support our local small business, e.g., cleaners, cafe, restaurant and tour operators.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

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- Mandate smoke alarms – either battery operated or hard-wired

- Require evacuation or emergency plans and guest education

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
John Trotter  
84 Rowan Cres  
Merewether, Nsw 2291

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Thursday, 12 September 2019 10:56 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Tessa Submissions, non Air BNB run

Submitted on Thu, 12/09/2019 - 10:55

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Johnny

**Last name**

Abegg

**Name withheld**

No

## Info

**Email**

[johnnyabegg@gmail.com](mailto:johnnyabegg@gmail.com)

**Suburb/Town & Postcode**

Byron Bay 2481



**Submission**

My name is Johnny Abegg and have lived in the Byron Shire for over 20 years. In that time, Byron has changed dramatically, a lot of positive change, but also negatives. I've had a lot of friends I grew up with in my late teens, to early adulthood and beyond, who've had to move over the last few years, as housing availability, and affordability has sky-rocketed. I've also noticed the 'locals' I grew up seeing and sharing our community with, I don't see as much anymore. Obviously Byron has always been tourist town, and I enjoy the influx of new faces and energy, but that balance has shifted somewhat these days.

I read recently that Air BnB properties in the Byron shire have jumped from 1,172 in 2016 to 3,306 in August this year. Of those, 1,331 listings for an entire home/apt are listed by 359 landlords only - evidence of multiple landlords with multiple properties. There's not many long time residents who can list multiple houses, most of which can barely afford to rent one. None of my long time friends can find a place to live here where they grew up, when investors are driving up prices up and effecting the permanent rental market in Byron Bay.

The new proposed State Environmental Planning Policy (Short-term Rental Accommodation) will entrench Short Term Holiday Letting in our Shire and change it for good, in a negative way I believe. There are 2,572 whole homes listed on Air BnB in Byron Shire, only 725 listings are for private rooms in people's homes.

I feel NSW is somewhat out of touch with locations all over the world. Major towns and cities are placing restrictions on Air BnB, but in NSW the state government appears to have allowed the short term letting accommodation industry to write the rules. There needs to be a cap placed on holiday letting in Byron Shire, we get the second highest amount of visitors behind Sydney in NSW, and don't have the ability to let out our housing, instead giving affordable housing back to the people who want to live and reside here long term.

Thanks for your time,  
Johnny Abegg

**I agree to the above statement**

Yes

# JOHNSON WINTER & SLATTERY

Partner: Samantha Daly +61 2 8274 9524  
Email: samantha.daly@jws.com.au  
Our Ref:  
DocID: 75944861.1

11 September 2019

Director, Housing and Infrastructure Policy  
NSW Department of Planning, Industry and Environment  
GPO Box 39  
SYDNEY NSW 2000

REGISTERED POST

Dear Sir/Madam

## Draft State Environmental Planning Policy (Short-term Rental Accommodation) 2019.

We refer to the public consultation draft of the *State Environmental Planning Policy (Short-term Rental Accommodation) 2019 (STRA SEPP)* which is on exhibition by the Department of Planning, Industry and the Environment (DPIE) until 11 September 2019.

We wish to make a submission on the STRA SEPP. A number of our clients will be users of the STRA SEPP and therefore have an interest in ensuring that the STRA SEPP provides suitable and practical approval pathways for this form of development.

Clause 13 of the STRA SEPP relates to '*Complying development – non-hosted short-term rental accommodation (STRA)*'. Specifically the clause provides that development for the purpose of non-hosted STRA is complying development for the purposes of the STRA SEPP if the development meets certain criteria. Under the provisions of clause 13(1)(h) of the STRA SEPP, development for the purpose of non-hosted STRA on land that is not zoned RU5 cannot be complying development unless the land is serviced by a reticulated water supply connection and a fire hydrant is located within 60m of any part of the dwelling.

It is likely that there are many STRAs in rural NSW that are located on land that is not zoned RU5, that are not connected to a reticulated water supply and are not located within 60m of a fire hydrant. It seems unreasonable that use of a dwelling for the purposes of STRA on land that is in any zone other than RU5 cannot be complying development if the land has a water tank with a 10,000 L capacity being the same requirement that is specified for RU5 land under cl. 13(1)(g) of the STRA SEPP, and where the land is not connected to a reticulated water supply and is not located within 60m of a fire hydrant. In our view the reason for this distinction in clause 13 of the STRA SEPP between RU5 land and other land is not discernible based on a review of the STRA SEPP or the Discussion Paper. Further this restriction may have the effect that the complying development pathway is not an option for many owners of land in zones outside RU5 resulting in potentially material impacts on the tourist economy in various rural locations in NSW. This would be in direct contradiction of one of the objectives of the STRA SEPP as stated in the STRA Discussion Paper to 'enable local communities to continue to benefit from STRA'.

Finally it is not clear from the STRA SEPP as to the position for owners of properties who wish to use a dwelling for STRA but for whatever reason do not fall within the exempt or complying development provisions of the SDRA SEPP. The *Explanation of Intended Effect* dated 5 October 2018 included a

Level 25, 20 Bond Street  
SYDNEY NSW 2000  
T +61 2 8274 9555 | F +61 2 8274 9500  
www.jws.com.au

Liability limited by a scheme approved under Professional Standards Legislation

reference to a proposed amendment to the Standard Instrument, however the current suite of documents on exhibition do not appear to include this proposed change. If this change is no longer proposed, it is not clear as to whether an owner of land would be required to obtain development consent for use of a dwelling for STRA (in the absence of the exempt or complying development pathways) as STRA is not a category of land use that is included in the majority of local environmental plans. Currently many Councils take the view that STRA is ancillary to use of a residence as a dwelling and therefore development consent is not required for that use. It appears the intention of the STRA SEPP is to change the status quo in this respect however in the absence of an amendment to the Standard Instrument this is not clear.

Please contact Samantha Daly if you have any queries in relation to this submission.

Yours Sincerely,

A handwritten signature in blue ink, appearing to read "Johnson Winter & Slattery", with a stylized flourish at the end.

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 8:41 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** recorded in DPIE subs register

Submitted on Wed, 11/09/2019 - 08:38

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

**First name**

Samantha

**Last name**

Daly

**Name withheld**

No

## Info

**Email**

[samantha.daly@jws.com.au](mailto:samantha.daly@jws.com.au)

**Suburb/Town & Postcode**

Sydney 2000

**Submission file**

[jws-submission-on-the-draft-stra-sepp.pdf](#)

**Submission**

Dear Sir/Madam,

Please see attached submission.

Regards,  
Samantha Daly  
Partner  
Johnson Winter & Slattery

**I agree to the above statement**

Yes

**From:** Jolon Cooke <jolon@activatemediaevents.com.au>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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Specifically, I want to comment on the following:

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Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
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## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Jolon Cooke  
47 Sir Thomas Mitchell Rd  
Bondi Beach, Nsw 2026

**From:** jon@jonbader.com  
**Sent:** Saturday, 17 August 2019 6:52 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Re: Holiday rental regulations for NSW

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category, sent

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens on our operations.

As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

As holiday rentals like mine become more important to the tourism economy, it's my strong belief the NSW Government should build a regulatory solution that ensures the sector can reach its economic potential.

Thank you reading my submission.

regards

Jon Bader

+61 417 560 454  
[jon@jonbader.com](mailto:jon@jonbader.com)  
[www.jonbader.com](http://www.jonbader.com)



**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Friday, 6 September 2019 10:56 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category

Submitted on Fri, 06/09/2019 - 10:54

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Jon

**Last name**

Human

**Name withheld**

No

## Info

**Email**

[john@human.com.au](mailto:john@human.com.au)

**Suburb/Town & Postcode**

Darlinghurst 2010

**Submission file**

[airbnb-submission-to-enquiry-aug-2019\\_0.docx](#)

**Submission**

Attached is my submission to the enquiry

Jon Human

**I agree to the above statement**

Yes

In general I am in agreement with the proposed legislation however I have the following concerns.

1. Allowing the industry to self-regulate: We have seen what happened when the building industry self-regulated and The Government took their eye off the ball. We don't need this to happen regarding STRA. A simple solution would be for Services NSW to create and manage two registers where by any Agent or Facilitator must be supplied, by the Host, the two unique Services NSW registered numbers before they can initiate a booking. One number is the Hosts number, that's similar to a drivers licence number. The second is the property number that is similar to a car registration number. In addition, the Services NSW file would also contain information on the property in question in that it complies with the required fire and bush fire regulations, that it has the mandatory insurances and the number of strikes against the Host, supplied by the Commissioner, again similar to the number of demerit points on your licence. If the system was on line it could also work as the Centre that keeps track of each booking with the name of the Guest with their identification details. The cost for this service would be yearly fees paid by the Host, similar to a drivers licence fee (one for the Host) and a car registration fee (for each property being used for STRA). In all my dealings with Services NSW I have been impressed with the service and their web site and could see no problems with Services NSW handling these registrars. If you think about it the STRA system would be similar to the system that administers licences and car registration in NSW so the logic when coding the new system would be very similar. You wouldn't need to reinvent the wheel and the costs to the Host would be similar to licence and registration fees.
2. Looking and the regulation I see no mandatory requirement for the Host to have insurance that covers damage done by their Guest to the Common Property they are staying at. As the Guest maybe from overseas chasing them for damages would be extremely difficult and you wouldn't want to rely on the Facilitator's insurance. Just look at the amount of property damage that has been done in Victoria by Guests! We need mandatory insurance that covers Common Property damage. This could also be included in the registrar.

**From:** Jonathan Allen <jonny.allen11@btinternet.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Jonathan Allen  
157 Redfern St  
Redfern, Nsw 2016

**From:** Jonathan Chaitow <chaitow@gmail.com>  
**Sent:** Monday, 19 August 2019 3:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Re: Holiday rental regulations for NSW

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

**As a result, regulation for our sector should avoid unnecessary burdens on our operations.**

As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

As holiday rentals like mine become more important to the tourism economy, it's my strong belief the NSW Government should build a regulatory solution that ensures the sector can reach its economic potential.

Thank you reading my submission.

--

Thanks,

Jonathan

**From:** Jonathan Chaitow <chaitow@gmail.com>  
**Sent:** Monday, 19 August 2019 3:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Re: Holiday rental regulations for NSW

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens on our operations.

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As holiday rentals like mine become more important to the tourism economy, it's my strong belief the NSW Government should build a regulatory solution that ensures the sector can reach its economic potential.

Thank you reading my submission.

**From:** Rocks Studios <rocksstudio3@gmail.com>  
**Sent:** Monday, 16 September 2019 2:53 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** STRA discussion Draft .

**Categories:** Tessa Submissions, non Air BNB run

We support STHL and We support the Draft recently put out for comment recently by NSW Gov.

Share Economy - Let Sydney & NSW lead the way !

If you own a property - good on you - you should be given a go - its hard enough to get ahead in Sydney - let there be diversity.

Regards,

Jordan Plant

Sydney NSW 2000

---



**From:** no-reply@planning.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Friday, 23 August 2019 11:27 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category

Submitted on Fri, 23/08/2019 - 11:27

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Jorge

**Last name**

Fernandez

**Name withheld**

No

## Info

**Email**

[jorge@appliedsense.com.au](mailto:jorge@appliedsense.com.au)

**Suburb/Town & Postcode**

Pymont

**Submission**

The STRA discussion paper release in August 2019 has not reasonably upheld the rights of Strata Owners Corporations in general as a decision to have a residential property free of tourist and short term rental stays which change the use of common property, compromise security and the general enjoyment of ones home.

My submission is that Strata Bylaws should override any and all wishes of any individual owners to short term let their lot for the security and fairness that all owners by majority have voted to keep the Strata Property as a residential only property.

There are no workable enforceable method of tracking common property damage by STRA visitors, identifying STRA visitors and their guests who break the existing bylaws and compromise the enjoyment of other owners and residents lots. This is due to the common sense approach that people behave and generally respect their homes more than a place to stay a few nights. We have much experience with parties, noise and unreasonable behavior if guests, so to multiply the effect and then leave less options to enforce the few rights Strata Owners already have should not be allowed.

All exceptions stated with "where a lot is not a host's principal place of residence" cannot be enforced or even monitored as this will become the default administrative method used by lot owners to contravene the Strata bylaws and rent their properties out to STRA visitors to the detriment of existing residents and owners.

Tourist accommodation is now well evidenced to change the character and quality of residential buildings, increase rents, lower standards of residential living and worse cause the inability of Central Worker rental accommodation availability for essential workers.

Lets not devolve the residential standards of our society based on the greedy desire of digital platform entrepreneurs wanting to make money from our invested residential properties in Strata. Individually owned single dwelling properties are a very different case, but where common property and closer community living conditions are already in place, then allowing this is against all the rights of existing Strata owners and their rights to choose the standard and type of living they have worked hard to buy or rent.

Yours respectfully,

Jorge Fernandez

**I agree to the above statement**

Yes

**From:** Joseph Leung <joseph@kozyguru.com>  
**Sent:** Wednesday, 11 September 2019 2:23 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Rob submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

I run a short-term rental management company based in Sydney. I will go over a few aspects to dissect the underlying reasons on why a fair regulation on short-term accommodation is much needed. For a regulation to be fair, it has to be relevant and constructive to the current economic outlook of NSW rental market corroborated with ample facts and evidences.

As a local STRA host, I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because

(i) Home-sharing is my way to share the Australian culture with fellow travelers around the world. Most of the guests I have hosted love what they have been offered. Some of them chose to stay with Airbnb because they want to go local, explore the neighborhood, and connect to local people. Hotels do offer them great accommodation experience but short-term accommodations offer more than just accommodation, they offer a sense of personal connectedness, cultural immersion, and experience internalization.

(ii) Home-sharing is a business, but it is a people business that go deeper than superficial hospitality. As a host, I have had great joy sharing moments with fellow travelers over drinks, barby etc. Exchanging words and banters.... Hosting travelers has become an important part of my lifestyle. I am opposed to imposing the day thresholds. Why should my lifestyle be penalized just because I have done a great job in hosting people from overseas while corporate hotels are not as good as me in providing what travelers are looking for?

(iii) Home-sharing is a way for me to earn some extra bucks. Having this passive income stream helps me to pay my mortgage and finance my expenses.

As a visitor who chooses to stay with short-term accommodation ever since the birth of home-sharing model,

(i) I document my travel stories all the time and I love the creativity hosts put into their STRA. Some of my stays have been with STRA, not because how big the houses were, or how much money the hosts have put into each accessory, but it is just that "peer-to-peer" experience you can't get from a hotel. It doesn't make sense why I can't stay with certain STRA hosts whom can offer the best worthwhile STRA experience compared to the like of big branded hotels due to the imposition of day thresholds. Staying in a hotel feels like I have to sidestep all the "business traps". The snacks bar costs you extra dollar, the wines in fridge are another \$50. I also have to be of certain manners when I stay with a hotel. I am not saying STRA allows me to trash a person's place or be inconsiderate to neighbors, but I can be more at ease while staying with STRA. Also, STRA has been so good at offering these little goodies and drinks as a welcome gesture for me.

(ii) STRA is a way for me to explore the locals. I used to love staying in hotels because they are of certain standards. However, STRA nowadays have become a great alternative for travelers as they have evolved to outmatch the experiences hotels can offer. This allows me to have great accommodation experience but at the same time to be "inside" the local community. The people I come across while staying off the major tourist attraction areas are more real and more "unexpected". This adds an extra flavor to my adventure without only seeing the infrastructures and major scenes that are made to be seen by tourists. I love the rawness of traveling abroad. And I expect fellow overseas travelers will want similar

experience when coming to Australia.

As a property investor, STRA has been a way for me to diversify my investment portfolio. The option to finance mortgage loan through STRA has added a push factor for property investment market in Australia, in turn leveling out the further downturn of housing market that has plagued Australia in recent years. I could not imagine if more property turn back to long term rental market after those regulation launched and how will this affect the property rental market. Somehow STRA vs long term have found an equilibrium in the Sydney rental market. If more property back to long term market which heavily affect the market and push the rental price down which might lead to real estate market drop again.

As a local business owner, thanks to the birth of home-sharing, more and more people in the local neighborhood are opening up their home which attract more travelers to this “unseen” area. Their arrivals have helped local business to grow as they spend more money on services and amenities that are outside of the major tourist scenes. This has helped regional and local economy to grow. This also draws more attention to the local area and implores local councils to pay more attention to local business opportunities that will support local tourism and finance city planning.

The economic impacts of Airbnb on housing market in Australia:

The growing number of STL has tapped into a significant amount of properties left vacant in the past and attempted to solve the longstanding issue of housing market being underutilized in Australia (Crommelin et al, 2018). The rise of Airbnb didn't trigger the inaccessibility of private rental sector to long-term renters but just amplified the distortion of existing market direction (Crommelin et al, 2018). So, to point finger at STRA for the unaffordability and unavailability of private rental sector is ruthless. We can't deny the contribution of STRA to the tourism market. The additional supply of STRA has created a buffer zone to facilitate the rising influx of tourists into Australia each year. It has also added \$1.6 billion to Australia's gross domestic product between 2015 and 2016 and has “supported” over 14,000 jobs. 74% Airbnb properties in major markets across the world are located outside the main tourism district, and the flow-on benefit we saw from the Airbnb effect can funnel down the surrounding local business which is recorded by 27% expenditure spent toward food service at local restaurant and a combined 29% went towards leisure activities (Deloitte, 2017) Here we see a free competitive new market, without the regulation of government, has this economic trickle-down effect. More complicated unnecessary regulation will strip away this economic effect on NSW's GDP.

Is This A Fair Regulation on STRA?

We understand that a fair proper regulation on STRA will ensure that every involving party can comply with the reasonable requirement set forth without complicating the process of home-sharing with unnecessary bureaucracy measures that see no practical implication on the safe and sound operation of hosting. In general, I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments to a “fair regulation on STRA”. Here are some relevant rebuttal points:

(i) 180-day thresholds: This is a very unfair regulation as this approach is an effort to undermine a free competitive existing rental market. Having the rental cap per year is essentially similar to penalizing business which provide great valued hospitality services. We understand STRA hosts are positioned on a higher playing grounds as they don't have to pay hotel tax and adhere to the strict safety regulation standard for hotels etc, but government should consider levelling out the field by imposing taxes on registered STRA instead of limiting their access to the playing ground. We agree on property registration for STRA but not for the purpose of facilitating the overseeing of hosts' compliance towards the 180-day threshold regulation. The imposition of day limits will further make the already inelastic housing market even more inelastic, further worsening the price fluctuation in the STRA and LTRA simultaneously.

(ii) The “strike system” introduced as part of the effort to regulate STRA will be controversial upon implementation. We understand this regulation is targeting “party house” or properties that disrupt neighborhood peace. But, most of the hosts in general do not allow “partying” in the house. We are concerned that the existence of “strike system” will unfairly punish hosts who are against “partying” to begin with (and as a result becoming a victim of unfair complaints and regulation by neighbors and building owners).

a. How are the Code of Conduct commissioners going to evaluate the validity of lodged complaints with consistent and fair judgment given that these complaints are filed based on subjectivity entirely? Hosts are most likely going to be penalized more often than not.

(iii) Regulation is hard to pin down if someone violates the 180 day threshold given the conditional clause that if hosts are present in the premises, it is “exempt development”. There seems to be no practical and efficient way to verify every single reservation whether hosts will be at the premises.

(iv) I specifically want to comment on the Environmental Planning and Assessment (STRA) Regulation 2019. The additional safety and evacuation requirement for dwellings used for STRA will impose additional cost barriers that are already stacking up against hosts while yield no significant practical application. I oppose the introduction red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it’s safe for my guests. I support the NSW Government streamlining safety regulations which:

a. Respect the ancillary use of my home for home sharing

b. Mandate smoke alarms

c. Require evacuation or emergency plans and guest education

This requirement can be easily achieved with brief safety instruction given upon check-in.

(v) I also oppose the requirement set forth by the STRA State Environmental Planning Policy for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. If I am just sharing my home for a few weeks a year, applying for a permit may not even breakeven for my cost. This makes hosting uneconomical. The expensive permit, if implemented, will severely impact holiday homes up and down the coast which have existed for decades without these permits. Of course, the additional cost will shift from owners to travelers, making traveling in NSW more expensive.

(vi) I oppose the potentially costly, complex, and onerous STRA property register. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost-effective self-assessment form, which is only required in limited circumstances. I don’t see how STRA property can do a better job in protecting hosts and guests given that existing platforms like Airbnb has had systems in place to remove guests or hosts that are violating community agreement. Most importantly, profit and reputation are much more powerful driver for quality services than regulatory compliance. This has been achieved due to the connectivity and transparency of the internet where feedback with reviews, pictures and peer references are readily made available. If host wants to thrive in this STRA business, they will of course have to meet hall the societal and community expectations of how a good STRA looks like.

What Does Regulation on STRA Imply?

If we think the annual day threshold regulation can address the issue of equity concerns, the existing housing market participants are still going to benefit from the STR and LTR market regardless. The issue at hand is the barrier to get into the housing market for low to middle-income earners, and government should place more emphasis on how to help these socioeconomic groups get into the playing field.

If we think the 180-day thresholds regulation can put more houses back to the long-term market:

(i) Homeowners are going to turn their property to short-term rental during peak travel season and turn it back to long-term rental during non-peak season.

(ii) Housing in suburbs like Bondi, Darlinghurst, Manly will exhibit this constant fluctuation between STRA and LTRA, creating more uncertainties for long-term renters. This will also create further frictions and barriers to enter into rental agreement. So, do the long-term renters get to live in these areas during off seasons but have to find somewhere else to live during travel season?

The Bigger Picture: Relationships between Housing Affordability & Availability & STRA

There have been investor-led building booms around Gordon, Miranda, Botany, Sutherland and Homebush areas. The number of units listed for rent in June 2017 has ballooned from 17,500 units to 32,680 listings, leading to a drop of rental price \$25 a week less median rent than last year. If we look at figures from Domain.com.au, there has been a city-wide level drop of rental price in all area from June 2017 to 2019, particularly for a one-bedroom unit in Chatswood which recorded a \$120 drop per week between September 2017 and March 2019. Sydney-wide rental vacancy rates have almost doubled from 1.7% in 2017 to 3.2% in 2019. So, the question is: Do we have undersupply housing issue?

The undersupply of long-term housing market, in the inner city Sydney and areas around Bondi, Manly and Darlinghurst can be resolved if better public transport system can be achieved that connect non-traditional rental area such as Northwest Sydney where there are massive boom of new housing for rents to these area. A good transport network is the best way to resolve the issue of overcrowding in certain areas given limited supply of long-term affordable housing. Imposing 180-day threshold will only solve the housing issue in these areas seasonally. This ties back to my point (ii).

Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I propose that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

A New Economic Framework:

As the NSW Government tries to best regulate home sharing, it is important to understand how working with existing market force can yield a more competitive and better economic outcome than imposing stringent rules and complicated planning requirements that can dampen the benefit of home-sharing. Home-sharing culture has sipped into a lot of homebuyers' decision-making process and it has very much been a new rising relational culture for residents of NSW. We want to work with the government to best regulate home-sharing but in an innovative way that is reflective of how people travel and how people use their homes.

Thank you for reading my submission.

Regards,  
Joseph Leung  
299-305 Sussex St  
Sydney, Nsw 2000

**From:** JOSEPH MERHI <jm@alwayssynergy.com.au>  
**Sent:** Wednesday, 11 September 2019 2:21 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it makes it more affordable to pay our mortgage and it helps promote this beautiful location as a tourist destination as well as support the local businesses.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

#### STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

#### Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
JOSEPH MERHI  
7 Wyuna Ave  
The Entrance North, Nsw 2261



**From:** Josephine Poirrier <tylerandjo@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:23 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because I want to provide people the opportunity to enjoy Avalon and surrounds as we do.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

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#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Josephine Poirrier  
2 Dress Cir Rd  
Avalon Beach, Nsw 2107

**From:** no-reply@planning.nsw.gov.au on behalf of Department of Planning,  
Industry and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Monday, 19 August 2019 11:59 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Cc:** DPE PS ePlanning Mailbox  
**Subject:** Have your say on Short Term Rental Accommodation

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category

Submitted on Mon, 19/08/2019 - 11:58

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Joshua

**Last name**

Moses

**Name withheld**

No

## Info

**Email**

[jmoses@gkstrata.com.au](mailto:jmoses@gkstrata.com.au)

**Suburb/Town & Postcode**

BROADWAY

**Submission**

If an Owners Corp choose to make their building no AIR BNB or not short term letting under 3 months, that's a by-law to the building, one in which any new owner has the rights to review before buying into the property.

The argument whether it devalues a building or not is contraversial on the basis that most family orientated people, would think that having an air bnb is actually a security risk with buildnig by-laws often not presented to them and doors often chocked open, as well as it usually being a party/holiday experience sees ameninities such as pools, see glassware used around them, when they shouldn't be.

There is a general lack of care by air-bnb type scenarios and as such, if a building chooses not to undertake air bnb - they should be given that right to dictate over how their building functions.

**I agree to the above statement**

Yes

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This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it immediately.

Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the NSW Office of Environment and Heritage.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

**From:** Josie Simpson <umtalahouse@gmail.com>  
**Sent:** Tuesday, 17 September 2019 1:27 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW - Bushfire risk properties

**Categories:** Tessa Submissions

Dear Minister,

As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct.

In particular I am very concerned about the specification for Complying Development - non-hosted short term rental accommodation and clause e "No part of the lot on which the dwelling is situated is bush fire attack level-40 (BAL-40) or in the flame zone (BAL-FZ)". My concern is around the use of the lot as the definition of the boundary as a lot can vary hugely in both shape and size. It would be more consistent to specify a radius around the dwelling or the current measure using the exposure of the building footprint in the PBP "the building will not be exposed to radiant heat leaves exceeding 29Kw/m<sup>2</sup> (1090K)."

I trust you will take this feedback into account to provide clarity and consistency in the application of measuring a fire risk to a property.

Kind regards  
Josie

**From:** Joy Chen <joyfuljoy@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:21 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

To whom it may concern,

As a local Airbnb host for 4 months, I wanted to provide my feedback on the Government's proposed regulations.

<https://www.planning.nsw.gov.au/STRA>

I'm from a new skilled immigrant family just settled in Sydney. It is not easy to start up in a brand new environment. Home-sharing helped us rely on our own efforts. We have never claimed any cent from benefit and we are always proud of that.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy". However, I am deeply concerned that the proposed rules will make it even infeasible for us to share our home.

Specifically, I want to comment on the following:

Per: Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, especially for the evacuation lighting systems.

First of all, I don't see any official data or reports supporting that properties for STRA are easier to catch fire than regular renting or residential dwellings. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests.

Moreover, as a strata-scheme property owner and owner corporation member, I understand how difficult, time-consuming and expensive it would be. Except for the cost of replacing the detector itself, according to the by-law, I'll need to pay even extra and go through a special resolution on an extra general meeting before any modification can be applied to the existing fire safety devices.

Of course, I understand that it's always important to do improvements for guests' safety. I'm already looking for batteries operated emergency lights which could be activated by siren and motion. I believe these products could provide the same protection as those smoke detector incorporated lights in the requirements.

Per: Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home-sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

Please be advised, I am not anti-regulation by any stretch, but I need fair and reasonable regulation.

Generally I support the Government's approach of regulating this industry, however, parts of the proposals are just unfair.

Thank you very much for your time!

Regards,  
Joy Chen  
181 Lawson St  
Darlington, Nsw 2008

**From:** Juda COHEN-HALLALEH <rabbiylcohen@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:16 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education



## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Juda COHEN-HALLALEH  
1-15 Fontenoy Rd  
Macquarie Park, Nsw 2113

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Tuesday, 10 September 2019 12:38 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Sylvia submissions, recorded in DPIE subs register, Purple category

Submitted on Tue, 10/09/2019 - 12:37

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

judith

**Last name**

di lenardo

**Name withheld**

No

## Info

**Email**

[judydil43@gmail.com](mailto:judydil43@gmail.com)

**Suburb/Town & Postcode**

wangi wangi 2267

**Submission**

My life has been impacted by a airbnb next door that has up to 20 people with beds for 14 the owner lives in hunters hill & has another airbnb at 198 kilaben bay rd kilaben bay with the same circumstances I

have had bucks & hens parties they come fully provisioned not spending anything in town This is operating as a buisness worse than a hotel at least with a hotel they have a manager to control behavior myplace has been devauled no one will buy next to what I have to put up with. please look into banning such houses. we will lose our school etc as we are a small community if we get more of these lettings in wangi wangi we want neighbours not strangers

**I agree to the above statement**

Yes

**From:** no-reply@planning.nsw.gov.au on behalf of Department of Planning,  
Industry and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Friday, 16 August 2019 1:56 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Cc:** DPE PS ePlanning Mailbox  
**Subject:** Have your say on Short Term Rental Accommodation

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category

Submitted on Fri, 16/08/2019 - 13:55

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

JUDITH

**Last name**

HALL

**Name withheld**

No

## Info

**Email**

[jurob@internode.on.net](mailto:jurob@internode.on.net)

**Suburb/Town & Postcode**

Toronto

## Submission

Judith & Robert Hall  
5/78 Brighton Av  
Toronto NSW 2283  
jurob@internode.on.net  
16.8.2019

Dear Fair Trading

The issue we wish to address today is our concern re possible government legislation allowing short term leasing in currently Council Zoned RESIDENTIAL areas. Those strata complexes in a commercial zone are a totally different matter, and our concerns are only for stratum in Residential zones. We would like to raise the following issues and concerns.

### Issue 1. Residential Council zone.

With reference to: The Lake Macquarie Local Environmental Plan 2014 Land Zoning Map – Sheet LZN\_009B: it is clear that our Strata Complex SP:63468 at 78 Brighton Ave Toronto is zoned R3. MEDIUM DENSITY RESIDENTIAL

78 Brighton Ave Toronto is totally a residential stratum with 22 'Villas' (Units and Town Houses). Our Complex is almost 60% Owner occupied (currently 13/22) with remaining 9 Lots currently tenanted as residential letting (minimum 3 months) - and we are blessed with lovely responsible residential tenants. We are very concerned re Section 2 of this Council document that appears to allow Council to consent to any Development Application.

The council?? This may be all well for a single dwelling domestic household's Development Applications however, it is a total abuse of Owners Corporation responsibility to manage their strata properties reflecting owner's wishes, such as our residential SP:63468.

### Issue 2. Special By-Law restricting short term leasing – passed unanimously at the Owner's AGM 2016

Our Owners have demonstrated their preference to remain totally residential by passing this Special By-Law restricting short term leasing. Strata records will confirm that this AGM was attended by both on-site and off-site owners (i.e. those owners who rent their property).

Furthermore, this By-Law restricting short term leasing;

- is registered by with the ATTORNEY GENERAL'S DEPARTMENT
- and appears on our Strata Common Property CERTIFICATE OF TITLE.

Therefore, it should be clear to a current owner or prospective buyer that our Owners' Corporation does not agree to any short-term leasing on their property.

A change in this By-Law should only be possible by our Owners Corporation at an AGM or Special OC meeting, agreeing to rescind the above and make a new By-Law.

No Council or Government Legislation should have the power to overthrow a legally registered By-Law supported by the Owners Corporation of a Strata complex; and in particular, a Strata complex in a Council Residential zone such as ours.

No one single owner should be allowed to abuse the wishes of the combined owners.

### Issue 3. Insurance implications

- We are insured by Strata Community Insurance (SCI) for value over \$10,500,000.
- To make this clear we are Insured for RESIDENTIAL Strata, with appropriate Building, Public Liability, Legal Expenses, etc for a RESIDENTIAL stratum.
- There is little doubt that a short-term holiday or Airbnb would qualify as commercial usage, and therefore our Strata premiums would rise.
- Furthermore, and as you are aware, Strata is shared common property and there have been many

incidences reported of problems created by short-term 'party rentals' abusing common property.

- 

Issue 4. NSW Government strata schemes management Regulations and the Act (2016) – Schedule 3 is being ignored and/or compromised.

We know you are familiar with the Strata By-Laws. There is little doubt that allowing any short-term leasing into a residentially zoned strata complex such as Sp:63468 would challenge these NSW

Government SSMA &SSMR (2016): in particular;

SSMR By-Law 17. Change in use or occupation of lot to be notified

i. An occupier of a Lot must notify the owners corporation if the occupier changes the existing use of the Lot.

ii. Without limiting clause (1) the following changes of use must be notified:

(a) a change that may affect the insurance premiums for the strata scheme (for example, if the change of use results in a hazardous activity being carried out on the Lot, or results in the Lot being used for commercial or industrial purposes rather than residential purposes),

(b) a change to the use of the Lot for short term or holiday letting.

iii. The notice must be given in writing at least 21 days before the change occurs or a lease or a sublease commences.

With regards to this last point 3, it is clear that as our Strata Plan already have a legally registered By-Law restricting short term leasing, that any such 'written notice' would still require the owner's corporation to hold an AGM or Special General Meeting to rescind our existing By-Law.

If this does not occur, the individual owner – and indeed the Strata Committee, the entire Owners Corporation and the Strata Manager appointed by the OC would be in abuse of your existing Laws, in particular:

SSMA Division 2 section 36 (3) the following decisions cannot be made by the strata committee

(a) a decision that is required by or under any Act to be made by the owners corporation by unanimous resolution or general resolution or in general meeting.

It would not make sense that an owner can simply notify within 21 days that they intend to break the Law by nullifying a legally registered Special By-Law (which SSMA Div 2 section 36 (3) states it cannot be approved by the Committee of Strata Manager either without a OC so why can an owner simply give 21 days' written notice.

This is a nonsense!! To do so is in clear breach of the SSMA. To make the point clear,– it is against the Strata Schemes Management Act, regardless of any council giving a DA approval or written letter from an owner!

Issue 5. Other NSW government strata schemes management regulations (2016) – schedule 3

The following SSMR By-Laws would also be abused, and/or extremely difficult to enforce.

By-Law 6. Noise.

- An owner or occupier of a Lot, or any invitee of the owner or occupier of a Lot, must not create any noise on a Lot or common property likely to interfere with the peaceful enjoyment of the owner or occupier of another Lot or of any person lawfully using common property.

By-Law 9. SMOKE PENETRATION (Our Owners Corporation voted for Option A), being:

- An owner or occupier, and any invitee of the owner or occupier, must not smoke tobacco or any other substance on the common property.

- An owner or occupier of the Lot must ensure that smoke caused by the smoking of tobacco or any other substance by the owner or occupier, or any invitee of the owner or occupier, on the Lot does not penetrate to the common property or any other Lot.

Please be assured we are not making any reference to those Stratum in commercial, mixed or other

zones already allowing some commercial use of the property.

We are only asking you to bring our concerns to the NSW Government regarding this matter for those Stratum where owners have chosen to live in

- a residential stratum,
- with SSMR residential strata By-Laws
- and with a legally registered Special By-Law on restricted leasing which appears on the Certificate of Title
- and with Residential Insurance
- and in a Council zoned Residential
- with residential council rates
- including residential bin arrangements.

Allowing short term leasing into a residential strata complexes such as 78 Brighton Av would undoubtedly put up our Insurance costs (both strata and private content) and would increase our council rates. It would also change our accepted By-Laws and nullify those Special By-Laws passed, registered and paid for by the existing Owner's Corporation.

If the State Government allow Councils an easy road to change conditions in Strata Living, it is affectively changing or challenging several sections of the NSW SSMA and SSMR as well as changing Council zoning regulations.

Regards

Robert and Judith Hall

Villa 5/ 78 Brighton Av

TORONTO NSW 2283

jurrob@internode.on.net

Mobile/R.0408256693

Mobile/J. 0438214270

**I agree to the above statement**

Yes

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-----  
This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it immediately.

Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the NSW Office of Environment and Heritage.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

**From:** J J Stephens <jazisoze@icloud.com>  
**Sent:** Sunday, 15 September 2019 7:39 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** STRA Discussion Paper  
  
**Categories:** Tessa Submissions, non Air BNB run

**Opposition to AirBnb forced upon strata apartments by legislation.**

**My address is HighGate 127 Kent Street Millers Point**

**Every strata should have the right to decide its own STRA position.  
This should be determined by special resolution requiring a 75% vote.**

**This is democratic and democratic is Australian.**

**sincerely concerned**

**Judith Stephens OAM**



**From:** Judith Tamone <judith@mediabrandaid.com>  
**Sent:** Wednesday, 11 September 2019 2:22 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Rob submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Judith Tamone  
15 Old Glenhaven Rd  
Glenhaven, Nsw 2156

**From:** judy tuck <jtuck310@hotmail.com>  
**Sent:** Tuesday, 17 September 2019 10:45 AM  
**To:** DPE PS STHL Mailbox  
**Subject:** Strata Discussion Re SAirBnb

**Categories:** Tessa Submissions

Dear Sir/Madam

I am very distressed that our Strata Bye-Laws may not be able to stop Airbnb. I lost my husband several years ago and as I am elderly I sold the family home to move into an apartment. I feel very confident living here with our fantastic security and 24hour staff.

i  
In an apartment block, as you can imagine, we live in close proximity but knowing the residents on my floor is a great help and we share all facilities, pool spa and gym and of course expenses with our Strata Levies. We are very proud of our building and our hard working Body Corporate oversee and maintain it constantly.

I cannot understand that Apartment Blocks cannot make their own rules, it is our home and we should be able to decide.

Yours faithfully

Judith Tuck  
2205/127 Kent Street  
Millers Point 2000

**From:** Julee Manley <juleemanley@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism. I feel this is especially important in our regional and country communities that are severely effected

By drought and economic downturn. For farming communities this provides an option for diversifying their income in tough times from using their homes and local knowledge to provide a local insight to enhance travel experiences for both domestic and overseas travelers. It also provides a social and emotional support system for both travelers and those struggling with the devastation of the drought. I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home and will be detrimental to communities and individuals that benefit socially, economically and emotionally from these accomodation options.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

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Environmental Planning and Assessment (STRA) Regulation 2019

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Julee Manley  
31 View St  
Gunnedah, Nsw 2380

**From:** Jules Amidy <jules@huntervalleyceremonies.com.au>  
**Sent:** Wednesday, 11 September 2019 2:13 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because I had no choice but to seek rental avenues that weren't some lazy agent who didn't care and didn't fill my calendar with bookings as they promised. I would have had to sell my flat if it wasn't for Airbnb coming to my rescue.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

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Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Jules Amidy  
12 Darling St  
Hamilton South, Nsw 2303

I am making this submission in my capacity as Chairperson of Grandview, SP61694, being 70-72 Alfred Street, Milsons Point, 2061, comprising 66 apartments with 165 residents.

We have several areas of acute concern with the short-term letting package proposed by the NSW Government:

1. Preservation of Owners' Rights:

Residential apartment buildings in mixed use and commercial zones with express prohibitions or limitations on short term letting must have their by-laws respected and preserved. There can be no over-riding policy reason which dictates limitations on the right of apartment owners to collectively decide whether or not to permit short-term letting where this is the clear desire of the democratic majority.

2. Collective Cost of Permitted Short-term Letting

Residential schemes must have authority to levy charges and fees on Hosts conducting short-term letting. The disproportionate cost to owners and owners' corporations from STRA operations (e.g. wear and tear of lifts, gyms, garbage and other utility areas as well as administration and management costs) means they are effectively subsidising those running STRA businesses. Security arrangements in individual buildings must not be compromised. The Hosts should also be required to advise the Owners Corporation of intent to let their property on a short-term basis and to pay any extra insurance costs levied on the building.

3. Preservation of Local Government Oversight

Local Councils must have the ability to set and apply zoning restrictions to meet their strategic planning objectives. They should be involved in designing and be part of the compliance and enforcement function of any registration system.

4. Fire Safety Standards:

The only way to ensure that mandatory fire safety standards are met is for STRA in residential strata schemes to be classed as "complying development" (not "exempt development") which allows for inspection by Local Council or a private certifier. In addition:

(a) Fire safety standards should be more onerous for short-term holiday visitors in high-rise apartment buildings as the threat to life of all residents is increased significantly.

(b) Fire standards applicable to residential apartment buildings do not address the fire risks of cooking, BBQ's or smoking on balconies which are common problems with short stay visitors unfamiliar with by-laws or local customs.

(c) Fire safety in residential strata schemes must not be left to self-regulating platforms or amateur hosts as it poses an unacceptable risk to all residents.

(d) Fire and Rescue NSW should have direct access to Register data such as how many STRA apartments are listed in a single high-rise building to enable accurate assessment in emergency situations.



## 5. Effective Registration:

An independent, publicly funded registration system is essential to identify STRA properties, the owner/host, their agent or nominated representative as well as having data on address, location, intensity, volume, days of availability, days of occupation, number of rooms, etc. in order to develop a profile and analysis of the STRA industry. Other major cities such as New York, San Francisco, Barcelona, Paris, Toronto and Vancouver, who have experienced this industry, are now devising or implementing legislation to strictly regulate its operation. At the very least, NSW should have controls in place BEFORE allowing STRAs to operate in apartment buildings as well as enforceable and fast-acting conflict resolution processes.

Given the disparate issues involved with the regulation of AirBnB, Stayz and the like, the Milsons Point Community Group regards as essential the establishment of a Register run by either Government, local Councils or a neutral platform, with powers that are time-sensitive, practically enforceable and of real utility to residential strata schemes. This Register must be necessary pre-requisite to any new regulatory framework. STRA can transform homes into hotel rooms and neighbours should not be obliged to give up their right to quiet enjoyment with bland reassurances about conflict resolution. Such a Register has been found to be helpful in somewhat alleviating these problems in cities overseas.

## 6. Host's Registration Obligations:

There must be enforceable obligations for Hosts to register the premises before it is used for STRA purposes. Penalties should apply for unregistered premises. The Host should identify all platforms on which their property is listed, identify days of availability and report nights of occupations. Additionally, there must be a legal obligation for Platforms and agents not to list an unregistered residential dwelling for STRA. Again, there should be no change in planning laws in residential apartment buildings until the Register is in place.

## 7. By-Law Enforcement:

In cases where a strata scheme has a by-law prohibiting STRA, it must not be possible for this to be circumvented by any person who is not an actual owner being registered as a host. In the case of residential tenants, there must be evidence that the landlord has expressly permitted the conduct of STRA by the lessee. STRA in strata buildings must require a complying certificate. This should be part of the registration process as it is essential data for regulatory oversight and enforcement.

## 8. 180 Day Cap:

The proposed 180 day cap is unacceptable and excessive by world standards. It makes a mockery of the original intention that the caps were to be an economic lever to drive apartments back into the domestic residential market.

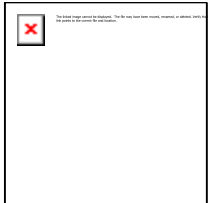
The rapid growth in short-term letting in recent years has had significant impact on apartment buildings as well as residents on areas such as amenity, strata costs and individual safety. Such growth has clearly outpaced regulation and owner's corporations should be given greater ability to manage these impacts. Under no circumstances should this industry be self-regulated.

Julia Connor.

**From:** Ministerial Services  
<MinisterialServices@customerservice.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 4:45 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** FW: short term letting  
**Attachments:** Short-term-letting-package-submission-final2.docx

**Categories:** Rob submission 3.0, non Air BNB run

**From:** [digital@dpc.nsw.gov.au](mailto:digital@dpc.nsw.gov.au) <[digital@dpc.nsw.gov.au](mailto:digital@dpc.nsw.gov.au)>  
**Sent:** Wednesday, 11 September 2019 3:10 PM  
**To:** Webform Anderson <[webform@anderson.minister.nsw.gov.au](mailto:webform@anderson.minister.nsw.gov.au)>  
**Subject:** short term letting



<b>Title</b>	Mrs
<b>First Name</b>	Julia
<b>Last Name</b>	Connor
<b>Phone</b>	0414870095
<b>Email</b>	<a href="mailto:connor.julia@gmail.com">connor.julia@gmail.com</a>
<b>Street Address</b>	23/70 Alfred Street South
<b>Suburb</b>	Milsons Point
<b>State</b>	nsw
<b>Postcode</b>	2061
<b>Subject</b>	short term letting
<b>Type of Enquiry</b>	comment
<b>Message</b>	Submission attached. The Premier's Department advised that this submission should be brought to your attention.
<b>Attachments</b>	Short-term-letting-package-submission-final2.docx - <a href="#">Download File</a>
<b>I would like a response</b>	Yes

**I would like to receive  
regular updates from the  
NSW Government**

---

No

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The views or opinions presented in this email are solely those of the author and do not necessarily represent those of the DCS. DCS accepts no liability for any loss or damage arising from the use of this email and the recipient should check this email and any attached files for the presence of viruses.

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I am making this submission in my capacity as Convenor of the Milsons Point Community Group which represents the Strata Committees of almost 30 multi-storied apartment buildings in Milsons Point, home to around 4,000 people. This population density is one of the highest in Sydney and makes our area particularly vulnerable to the problems associated with short-term letting and the tourist market.

We have several areas of acute concern with the short-term letting package proposed by the NSW Government:

1. Preservation of Owners' Rights:

Residential apartment buildings in mixed use and commercial zones with express prohibitions or limitations on short term letting must have their by-laws respected and preserved. There can be no over-riding policy reason which dictates limitations on the right of apartment owners to collectively decide whether or not to permit short-term letting where this is the clear desire of the democratic majority.

2. Collective Cost of Permitted Short-term Letting

Residential schemes must have authority to levy charges and fees on Hosts conducting short-term letting. The disproportionate cost to owners and owners' corporations from STRA operations (e.g. wear and tear of lifts, gyms, garbage and other utility areas as well as administration and management costs) means they are effectively subsidising those running STRA businesses. Security arrangements in individual buildings must not be compromised. The Hosts should also be required to advise the Owners Corporation of intent to let their property on a short-term basis and to pay any extra insurance costs levied on the building.

3. Preservation of Local Government Oversight

Local Councils must have the ability to set and apply zoning restrictions to meet their strategic planning objectives. They should be involved in designing and be part of the compliance and enforcement function of any registration system.

4. Fire Safety Standards:

The only way to ensure that mandatory fire safety standards are met is for STRA in residential strata schemes to be classed as "complying development" (not "exempt development") which allows for inspection by Local Council or a private certifier. In addition:

(a) Fire safety standards should be more onerous for short-term holiday visitors in high-rise apartment buildings as the threat to life of all residents is increased significantly.

(b) Fire standards applicable to residential apartment buildings do not address the fire risks of cooking, BBQ's or smoking on balconies which are common problems with short stay visitors unfamiliar with by-laws or local customs.

(c) Fire safety in residential strata schemes must not be left to self-regulating platforms or amateur hosts as it poses an unacceptable risk to all residents.

(d) Fire and Rescue NSW should have direct access to Register data such as how many STRA apartments are listed in a single high-rise building to enable accurate assessment in emergency situations.

## 5. Effective Registration:

An independent, publicly funded registration system is essential to identify STRA properties, the owner/host, their agent or nominated representative as well as having data on address, location, intensity, volume, days of availability, days of occupation, number of rooms, etc. in order to develop a profile and analysis of the STRA industry. Other major cities such as New York, San Francisco, Barcelona, Paris, Toronto and Vancouver, who have experienced this industry, are now devising or implementing legislation to strictly regulate its operation. At the very least, NSW should have controls in place BEFORE allowing STRAs to operate in apartment buildings as well as enforceable and fast-acting conflict resolution processes.

Given the disparate issues involved with the regulation of AirBnB, Stayz and the like, the Milsons Point Community Group regards as essential the establishment of a Register run by either Government, local Councils or a neutral platform, with powers that are time-sensitive, practically enforceable and of real utility to residential strata schemes. This Register must be necessary pre-requisite to any new regulatory framework. STRA can transform homes into hotel rooms and neighbours should not be obliged to give up their right to quiet enjoyment with bland reassurances about conflict resolution. Such a Register has been found to be helpful in somewhat alleviating these problems in cities overseas.

## 6. Host's Registration Obligations:

There must be enforceable obligations for Hosts to register the premises before it is used for STRA purposes. Penalties should apply for unregistered premises. The Host should identify all platforms on which their property is listed, identify days of availability and report nights of occupations. Additionally, there must be a legal obligation for Platforms and agents not to list an unregistered residential dwelling for STRA. Again, there should be no change in planning laws in residential apartment buildings until the Register is in place.

## 7. By-Law Enforcement:

In cases where a strata scheme has a by-law prohibiting STRA, it must not be possible for this to be circumvented by any person who is not an actual owner being registered as a host. In the case of residential tenants, there must be evidence that the landlord has expressly permitted the conduct of STRA by the lessee. STRA in strata buildings must require a complying certificate. This should be part of the registration process as it is essential data for regulatory oversight and enforcement.

## 8. 180 Day Cap:

The proposed 180 day cap is unacceptable and excessive by world standards. It makes a mockery of the original intention that the caps were to be an economic lever to drive apartments back into the domestic residential market.

The rapid growth in short-term letting in recent years has had significant impact on apartment buildings as well as residents on areas such as amenity, strata costs and individual safety. Such growth has clearly outpaced regulation and owner's corporations should be given greater ability to manage these impacts. Under no circumstances should this industry be self-regulated.

Julia Connor.

**From:** Julian Crawford <ecosteps@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:22 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** rob submission 2.0, Air BNB run

Dear Director, Housing and Infrastructure Policy,

Hi Trisha

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing

- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Julian Crawford  
5-7 Werong Ave  
Wentworth Falls, Nsw 2782

**From:** Juliana Egan <duffity01@bigpond.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because I'm unemployed over 57 and have been looking for a job for four years. I have applied for a least 50 jobs. It seems no one wants to employ anyone in the late fifties. I have studied to keep my skills up to date over the last 15 years to keep me relevant for today's job market.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

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Government streamlining safety regulations which:

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#### STRA Property Register

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#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Juliana Egan  
14 Wilga St  
Bondi, Nsw 2026

**From:** Julie Baker <baker.julie59@yahoo.com.au>  
**Sent:** Thursday, 5 September 2019 10:51 AM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

**Categories:** Purple category

Dear Minister, Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry. As a result, regulation for our sector should avoid unnecessary burdens on our operations. As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

I would also like to make a submission that short term holiday home owners put in place a building and fire safety plan, as per Environmental planning and Assessment Relegation 2000, these Regulations that commenced 1st October 2017 ,this will insure that responsible owners are issued with a fire safety statement .

Kind Regards

Julie

**From:** jules.blair@yahoo.com  
**Sent:** Sunday, 18 August 2019 8:51 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category, sent

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens on our operations.

As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

As holiday rentals like mine become more important to the tourism economy, it's my strong belief the NSW Government should build a regulatory solution that ensures the sector can reach its economic potential.

Thank you reading my submission.

Julie Blair

**From:** Ministerial Services  
<MinisterialServices@customerservice.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 4:45 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** FW: short term letting  
**Attachments:** Short-term-letting-package-submission-final2.docx

**Categories:** Rob submission 3.0, non Air BNB run

**From:** [digital@dpc.nsw.gov.au](mailto:digital@dpc.nsw.gov.au) <[digital@dpc.nsw.gov.au](mailto:digital@dpc.nsw.gov.au)>  
**Sent:** Wednesday, 11 September 2019 3:10 PM  
**To:** Webform Anderson <[webform@anderson.minister.nsw.gov.au](mailto:webform@anderson.minister.nsw.gov.au)>  
**Subject:** short term letting



<b>Title</b>	Mrs
<b>First Name</b>	Julia
<b>Last Name</b>	Connor
<b>Phone</b>	0414870095
<b>Email</b>	<a href="mailto:connor.julia@gmail.com">connor.julia@gmail.com</a>
<b>Street Address</b>	23/70 Alfred Street South
<b>Suburb</b>	Milsons Point
<b>State</b>	nsw
<b>Postcode</b>	2061
<b>Subject</b>	short term letting
<b>Type of Enquiry</b>	comment
<b>Message</b>	Submission attached. The Premier's Department advised that this submission should be brought to your attention.
<b>Attachments</b>	Short-term-letting-package-submission-final2.docx - <a href="#">Download File</a>
<b>I would like a response</b>	Yes

**I would like to receive  
regular updates from the  
NSW Government**

---

No

\*\*\*\*\*

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\*\*\*\*\*

**From:** Julie de Rooy <juliederoy@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:16 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

My husband and I host Airbnb by sharing our small home in Nth NSW rural area of Kyogle. We have two guests max at a time and we do not make a large profit. We started this after becoming made redundant at year ago. Now in our 50s, it's difficult to find alternative work, especially in regional NSW. The income from Airbnb helps us enormously but it is very modest. It effectively helps us to pay our mortgage and council rates. We also recommend guests to patronise our favourite cafes, restaurants and shops so small businesses get a boost from local tourism. This is especially important in a struggling country town such as Kyogle which has a diminishing population.

We are deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for us to share my home.

We understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally we support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, we want to comment on the following:

#### STRA State Environmental Planning Policy

We oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

#### Environmental Planning and Assessment (STRA) Regulation 2019

We oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if our house is approved to be safe for us to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

Our property already complies with these requirements. We take occupational health and safety regulations and obligations very seriously and we have an Operations Policy and Environmental Management plan having contemplated emergency situations which deal with evacuations and guest education.

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework. This does directly impact on us but I understand it is difficult for other Airbnb hosts.

#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Julie de Rooy  
997 Homeleigh Rd  
Upper Horseshoe Creek, Nsw 2474

**From:** Julie Farah <julie@jgfarah.com>  
**Sent:** Thursday, 5 September 2019 9:52 AM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

**Categories:** Purple category

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens on our operations.

As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

Kind Regards,  
Julie Farah

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**W:** jgfarah.com **T:** 0412 980 940 **in™** [linkedin.com/in/julie-farah](https://www.linkedin.com/in/julie-farah)

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**From:** Julie Goodman <julie@beautygarage.com.au>  
**Sent:** Wednesday, 11 September 2019 2:20 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

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## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Julie Goodman  
168 Karalta Rd  
Erina, Nsw 2250

**From:** Julie henson <julianty.henson@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:16 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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Thank you for reading my submission.

Regards,  
Julie henson  
33 William Rd  
Riverwood, Nsw 2210

**From:** Julie Jennings <juliedavejennings@me.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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Thank you for reading my submission.

Regards,  
Julie Jennings  
24 Eucalyptus Dr  
One Mile, Nsw 2316

**From:** Julie Leal <juliebbd@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Rob submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it is a beneficial community activity. It helps travellers and allows us to be hospitable to others. It is a great thing for children to see others helping one another.

The Airbnb host community depends on hosting as an a viable sharing option across the world. We use it overseas and have enjoyed the warmth shown to us and we are motivated to do that for others. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism. This cannot be underestimated.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

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- Require evacuation or emergency plans and guest education

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Julie Leal  
16 Ronald Ave  
Freshwater, Nsw 2096



**From:** Julie mclean <juleskmclean@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

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Thank you for reading my submission.

Regards,  
Julie mclean  
62 Portico Parade  
Toongabbie, Nsw 2146

**From:** no-reply@planning.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Wednesday, 21 August 2019 9:54 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category

Submitted on Wed, 21/08/2019 - 09:54

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Julie

**Last name**

Payne

**Name withheld**

No

## Info

**Email**

[jmpayne1953@gmail.com](mailto:jmpayne1953@gmail.com)

**Suburb/Town & Postcode**

Cobar 2835

**Submission**

I would like to submit my view on Short Term Rental Accommodation

While short term rentals may be suitable in some instances I feel it is eroding the commercial value for providing short term accommodation such as Hotels, Motels, Hostels, caravan Parks, Real Estate Agents,(to name a few examples).I believe most commercial operations adhere to a fairly rigid Code of Conduct which I hope is well policed

I know a lot of time ,hard work,investment and passion goes into providing a good accommodation experience for people seeking rental from most of the above businesses.

How well are these short term rentals investigated for overcrowding and there is also a possibility for the use of cash not being recorded which has an ongoing effect on the economy

How often does the media report bad behaviour and noise especially from the fairly new concept of operations such as AirBNB . This is not fair to the neighbourhood to people who want to live peacefully and not have to put up with unruly raucus behaviour,property neglect and thoughtless disposal of rubbish and noise.

I can see Short Term Rental Accommodation encroaching on the same abuse of regulation as the Free Camping Movement which I also do not support.

I have read the Guidelines for the Code of Conduct and feel non compliance should be acted upon immediately for those who do not adhere to this document.Afterall it is there for a reason.That being compliance.

Too many times complacency has resulted in bad consequences so no warnings,and immediate action should be implemented if the Code is breached

In conclusion there cannot be too many regulations in ensuring Short Term Rental Accommodation does not become another self regulated industry within itself

Thankyou

Julie Payne

**I agree to the above statement**

Yes

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This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it immediately.

Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the NSW Office of Environment and Heritage.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

**From:** Julie Sheather <julie@mandarinmedia.com.au>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it helps to cover the costs of owning property in Terrigal, especially with the high tourism rates charged by council.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism. Very often our guests use other small local business for day trips, meals and entertainment.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

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Thank you for reading my submission.

Regards,  
Julie Sheather  
34 Barnhill Rd  
Terrigal, Nsw 2260

**From:** Julie Tarne <secretatsussex@gmail.com>  
**Sent:** Friday, 6 September 2019 12:47 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

Dear Minister, Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry. As a result, regulation for our sector should avoid unnecessary burdens on our operations. As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Friday, 6 September 2019 3:23 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** recorded in DPIE subs register, Purple category

Submitted on Fri, 06/09/2019 - 15:23

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Juliet

**Last name**

Shirbin

**Name withheld**

No

## Info

**Email**

[juliets@gmail.com](mailto:juliets@gmail.com)

**Suburb/Town & Postcode**

2011



**Submission**

These proposed changes are being muscled in by a small but vocal and influential body of people and business with their own agendas who undoubtedly predominately do not even live in shared strata schemes - Airbnb executives and proponents of the shared economy lack complete consideration for other residents - they are not the people who's liveability and safety is compromised. We are - people who's permanent residences are apartments.

We have families, small children, sick and elderly family members and should not be disturbed by our homes being turned into hotel like facilities. Our safety and peaceful enjoyment of our properties should not be compromised by those who want to commercialise their properties as they are NOT the ones being affected or sharing common properties.

**I agree to the above statement**

Yes

**From:** JULIJANA GRIFFITHS <jgriffithsphotography@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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Specifically, I want to comment on the following:

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Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

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Thank you for reading my submission.

Regards,  
JULIJANA GRIFFITHS  
27A Millbank Rd  
Terara, Nsw 2540

**From:** justin woodcock <jwoodcock@thelem.com.au>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because the flexibility in both, personal accommodation and renting, provides my family and I the options of receiving rental income, and also using the property for our own personal use. It creates another valuable and more flexible form of real estate leasing.

I can only see benefits in providing travellers with an additional form of accommodation option. If the key risks to short term accommodation are managing disruptive behaviour by a few, then these proposed legislative changes are excessive and a significant burden on both owners and Government. I always thought the Liberal Party were for entrepreneurialism, a free market and innovation? These proposed legislative changes do not reflect those values.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

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Thank you for reading my submission.

Regards,  
justin woodcock  
29 King Edward St  
Pymble, Nsw 2073

**From:** Justine Cruise <sjcruise82@cloud.com>  
**Sent:** Wednesday, 11 September 2019 2:16 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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Thank you for reading my submission.

Regards,  
Justine Cruise  
14 Seabreeze Cl  
Anna Bay, Nsw 2316

**From:** Justine Waddington <waddingtonjustine@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because as a single household dweller it eases the burdens of paying bills on my own. It's also wonderful as I can host other women, like myself that are solo travellers. I make amazing connections with likeminded women and offer a supportive and save place for them to stay. I do not host often, it's only time to time but i run my own company and when sales are tough this makes a big difference.

When guests arrive I tell them them all the local jaunts. I often will take them to a local restaurant or our Saturday market.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

It's a grave fear thinking that a government wants to control my own property. A fear of a future where we are 'policed' or 'over governed' in our own homes.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

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Thank you for reading my submission.

Regards,  
Justine Waddington  
195 Victoria St  
Potts Point, Nsw 2011

**From:** Ken Moon <ken\_moon@hotmail.com>  
**Sent:** Tuesday, 24 September 2019 12:48 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Short term letting

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

To whom it may concern.

Dear sir/madam

My home is an apartment in the Highgate building at 127 Kent Street, Millers Point 2000

I have no problem with 3 month rentals but i think that using the building as an hotel as would happen with Air BNB

would spoil the life style of everyone that lives permanently in the City of Sydney.

I think that a building should be able to make it's own decision with a majority democratic vote on whether to opt in or opt out of short term lettings

Your faithfully

K J Moon

2602/127 Kent Street

Millers Point

10 September 2019

## **RE: Short Term Rental Accommodation & Airbnb**

I am writing to express my strong objection to the proposed "Short Term Rental Accommodation" and "Airbnb reforms". This Basically rewrites the NSW Strata Housing Model & leaves owner occupiers & long term residential tenants unprotected & majorly impacted by a multitude of social & financial issues.

Where's the consideration that some buildings are not equipped to deal with the additional wear & tear on amenities (i.e. Hot water systems, lifts, high traffic areas run down, excessive rubbish, bathroom waterproofing failing from overuse repairs etc.) security, privacy, fire hazards, social issues, noise pollution, breeching of bylaws every day & the costly repairs on damages & overused & vandalised common properties not to mention administration & management costs).

Unless these are addressed, owner/occupiers and investors with residential tenants will be significantly subsidising the business models of those running STRA businesses.

The Government should also consider that older buildings certified as residential should have a right to Not permit Short Term Rental and Airbnb Accommodation with a Bylaw passed or other legal means. How will the Government even mandate the proposed reforms, it seems unrealistic & almost impossible & again leaving the burden on the Owner Corporations & Strata Management to deal with the impacts.

The burden is costly, our levies have doubled if not trippled with the non regulated & out of control short term rental and Airbnb including the ever increasing corrupt overcrowding dorms & subleasing rackets. We deal with these on a daily basis & let me tell you it's exhausting, frustrating & at times distressing, impacting residents mental well being & enjoyment of their homes & local area. Council does little if anything & Agents are just as corrupt or dismissive when addressing issues (another issue that needs Government regulation & better reforms to protect owners corporations).

There has to be rigid guidelines where only new building certified are allowed to operate these Rental properties. (i.e. certified that the building is deemed appropriate to accommodate these types of operations under their bylaws & or DA)

We are also currently undergoing major remedial works that are costing the owners over \$6 Million Dollars and that's not including 10 years of previous works and yearly water penetration expenses. These have been a huge strains on owners to complete fire safety compliance works, cladding compliance works & waterproofing compliance, mostly due to dodgy developers & builders who again were not regulated & policed. We are dealing with these heartbreaking financial issues & burdens & you now slap

us in the face with these pathetic reforms that will only push us to the very edge.

The rising costs of strata levies & ludicrous special levies due to all of the above mentioned have resulting in some owners making the heartbreaking decision to sell or lose their homes to the bank unable to afford the costs & deal with the impact of all the above mentioned.

If we can get the Government to start making serious legislative changes to protect owners & give them more power & justice without the financial burdens & social impacts, it's means we protect residential communities that contribute to the economy & their local communities in a positive & harmonious way.

Yours sincerely  
Resident of Ultimo  
Kala

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Tuesday, 10 September 2019 9:59 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** recorded in DPIE subs register

Submitted on Tue, 10/09/2019 - 21:53

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Kala

**Last name**

Koutsakis

**Name withheld**

No

## Info

**Email**

[Kala.Koutsakis@Bigpond.com](mailto:Kala.Koutsakis@Bigpond.com)

**Suburb/Town & Postcode**

2007

**Submission file**

[response-to---short-term-rental-and-airbnb---10-september-2019.doc](#)

**Submission**

Please find attached my response/feedback for consideration regarding proposed Short Term Rental Accommodation & Airbnb reforms.

**I agree to the above statement**

Yes

**From:** Kara Walker <kara@ententeagency.com>  
**Sent:** Wednesday, 11 September 2019 2:16 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Kara Walker  
28 Amaroo Dr  
Smiths Lake, Nsw 2428



**From:** Karen Bennett <admin@tallarookgroup.com.au>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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Thank you for reading my submission.

Regards,  
Karen Bennett  
2000B The River Rd  
Mogood, Nsw 2538

**From:** Karen Copeland <alburywodongaluxuryhomes@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

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Thank you for reading my submission.

Regards,  
Karen Copeland  
30 Mace Ct  
Glenroy, Nsw 2640

**From:** no-reply@planning.nsw.gov.au on behalf of Department of Planning,  
Industry and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Wednesday, 14 August 2019 3:35 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Cc:** DPE PS ePlanning Mailbox  
**Subject:** Have your say on Short Term Rental Accommodation

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category

Submitted on Wed, 14/08/2019 - 15:34

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Karyn

**Last name**

Hewitt

**Name withheld**

No

## Info

**Email**

[karynhewitt@me.com](mailto:karynhewitt@me.com)

**Suburb/Town & Postcode**

Bogangar 2488

**Submission**

We are in favour of short term holiday letting in our area. We have a granny flat on our property which we would love to Airbnb/short term holiday let. We live in the main house on the property so would be here to monitor and control who we have staying in the granny flat.

Karyn & Sam Hewitt.

**I agree to the above statement**

Yes

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This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it immediately.

Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the NSW Office of Environment and Heritage.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 1:39 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** recorded in DPIE subs register

Submitted on Wed, 11/09/2019 - 13:39

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Karen

**Last name**

Plummer

**Name withheld**

No

## Info

**Email**

[karen@plummer.net.au](mailto:karen@plummer.net.au)

**Suburb/Town & Postcode**

2023

**Submission**

Dear Sir/Madam,

In 2018 my community successfully motivated Woollahara Council to issue an Order to Cease short term letting of my neighbour's property. This is the only order that any NSW council has issued since the State government announced the review of short term letting.

I worked for many years as a NSW public servant in compliance and regulation. I am a very experienced investigator. I used all my training and knowledge to achieve an Order to Cease. After having gone through the process of investigating my neighbour's business and the behaviour of his short term tenants, I'm not surprised this has been the only order issued.

I would like to share with you the following insights and concerns:

#### A. Investigating Short term Letting

A neighbour lodging a complaint regarding short term letting is placed in the position of proving there has been a breach. The primary basis of complaint is proving that the neighbour has rented the home out for the purpose of short term letting.

A neighbour has very limited ability to prove the property is being let short term. The only way to prove it is to act as a private investigator and collect evidence by observation (notes and photographs). This requires diligence and many months of work to prove "short term letting".

The amount of time, effort and skill it takes to establish short term letting is extreme. Neighbours should not be expected to essentially stalk the neighbouring business to provide proof of short term letting. If a matter is lodged at the tribunal, the government should require platforms and business owners to provide booking and income information for the period of the alleged breach.

The business owners, real estate agents and rental platforms possess documents to prove short term letting. They must be required to provide that information to the tribunal.

#### B. Noise Complaints and Behaviour

The current residential noise regulations do not adequately address short term letting.

Our neighbour's property was let out for parties every weekend for months. The occupants would party every Friday and Saturday night; they would follow up with an after party on Sunday morning. This went on for months. The community was exhausted and frazzled.

We lodged numerous noise complaints with NSW Police. We discovered that noise complaints are of the lowest priority for local commands (please refer to NSW Police annual report). Their response was either very late or not at all. Police recommended that we take the matter to local court ourselves. We soon discovered that the level of proof required for an application was far greater than just general observations and video recordings. We were required to provide professional noise measures and to employ a solicitor to present our case. The minimal cost was approx \$15,000.

It is unrealistic to expect a neighbour to bear these costs. Therefore, business owners should be required to register any parties with police (there is currently a process available) and parties should be limited to 2-3 a year (which would reflect current home owners use).



Limits should be set on the use of out door areas and amplified music. Current accommodation providers set limits; it is reasonable to expect short term let business owners set similar limits.

The current noise regulations were not written to address short term letting in residential areas. Therefore, the new regulations and code of conduct must address the short fall.

#### C. Complaints to Owners, Rental Platforms and Real Estate Agents

Naively, we followed the complaint procedures expecting the situation to improve. Disappointingly this did not occur and we forced to pursue the matter with council. This was particularly galling as all parties claimed to endorse the Voluntary Code of Conduct.

After council had issued the Notice to Cease, we lodged the notice with the various Rental Platforms and Agents with a request to delist the property. We were advised that they could not respond to our complaints due to privacy laws. The property continued to be listed.

Eventually, the business owner delisted the property after the council threatened fining the owner.

All business stake holders should be held accountable for compliance. Fines should be issued at a rate that is commensurate to the value of the property.

Ours neighbours property is valued at \$6,000,000 and his rental income per week was \$10,000. A fine of \$20,000 would not be a deterrent.

Airbnb's current value is conservatively \$80 billion plus. A commensurate fine must be applied to ensure compliance.

#### D. Code of Conduct

In our experience, a voluntary code of conduct was worthless. It may well be, but not as a voluntary

The only reason short term letting ceased was because regulatory compliance was required.

Sadly, regulation is required. Because they cannot be relied on to "do the right thing".

Just ask anybody living next door to a poorly managed short term accommodation provider. Profits often get in the way of reasonable outcomes.

NSW residents should be protected.

I am happy to provide further information about my experience. Please feel free to contact me on 0424063289.

Yours faithfully,

Karen Plummer

**I agree to the above statement**

Yes

**From:** karen <karen@carlsonterrace.com>  
**Sent:** Saturday, 7 September 2019 4:35 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry. As a result, regulation for our sector should avoid unnecessary burdens on our operations. As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

I successfully manage properties in The Rocks/Millers Point/Dawes Point. Without disturbance to surrounding neighbours.

I employ 2 ladies on a part time basis, 3 days per week.

The cleaners rely on me, as I provide a large portion of their income, they recently purchased their first home, they are now dependent on the work I give them.

Then there is the laundrette, paying approximately an annual income of \$60,000.

A few weekends ago I unfortunately had a double booking. When trying to find alternate accommodation there was nothing available in the CBD, The Rocks/Millers Point area. Only very expensive hotels, which was not an option for this family. It certainly makes me wonder how Sydney would cope with less choice of accommodation.

I provide quality accommodation at an affordable price, my clientele are mainly families.

I believe tourist destinations within the Sydney basin should not fall into the 180 nights limit.

The Rocks, Miller's Point, DAWES Point, Barangaroo, Manly, Cronulla and Bondi.

An easy way to reduce the amount of short term accommodation is to stop subletting.

I know in my area, there a number of properties that rent out a house then furnish it and fill up a 3 bedroom house with 10 to 12 people. Any damage to the house is paid for by the owner. No risk to the operator.

If Airbnb/Homeaway had requirements such as a rates notice, a letter from the owner with permission for the house to be managed and a copy of the owner's driver's license. Many of these dodgy operators would sail away.

Kind regards,  
Karen Weston  
Carlson Terrace  
55 Temple Street,  
STANMORE 2048  
0418859729

Sent from my Samsung Galaxy smartphone.

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Sunday, 8 September 2019 5:35 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** recorded in DPIE subs register, Purple category

Submitted on Sun, 08/09/2019 - 17:35

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Karen

**Last name**

Wilson

**Name withheld**

No

## Info

**Email**

[karenwilsonbyron@gmail.com](mailto:karenwilsonbyron@gmail.com)

**Suburb/Town & Postcode**

2481

**Submission**

I do not support the invasion of air bnb homes within our residential neighbourhoods. It is already and will continue to undermine our community fabric. I would like severe limits to be placed on air bnb listings and feel nothing more than a room in a private dwelling occupied by the owner should be legally able to be air bnb listed

**I agree to the above statement**

Yes

**From:** Karin Escombe-Wolhuter <karinescombewolhuter@gmail.cpm>  
**Sent:** Wednesday, 11 September 2019 2:22 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because I am a widow and it helps to support my pension . Keeping me financially independent. As well as having the opportunity not to feel too much alone.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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Thank you for reading my submission.

Regards,  
Karin Escombe-Wolhuter  
12 Browning St  
Byron Bay, Nsw 2481

**From:** Karina Ramirez <karititor60@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:20 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Rob submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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Thank you for reading my submission.

Regards,  
Karina Ramirez  
14 Terry Turner Dr  
Orange, Nsw 2800

**From:** Karina Vickery <karinavickery@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:23 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Rob submission, Air BNB run

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2. Are there any elements of the draft instrument that are open to misinterpretation or require further clarification? Yes, the definition of STRA in Section 4 defines all STRA as 'commercial' however this has the potential to allow councils to force STRA hosts into complying with a Class 1B building as defined by the NCC building code Vol 2. This would be uneconomical for many people and I believe is in conflict with the intent of STRA regulation.

Additionally, this definition also seems to conflict with the draft Code of Conduct for STRA which states "Industry Short-term rental accommodation does not involve purely commercial accommodation providers such as hotels, motels and bed and breakfast establishments. It generally involves residential dwellings that may also be used by the owners for their own accommodation at times." This shows a clear separation between STRA and typical commercial providers who operate as a business as defined by the ATO. While some STRA are being operated in a business-like manner, the vast majority do not nor

do the hosts rely on the income as their primary income.

Further, it is unclear if a STRA is booked for more than 21 days, what number of days is actually counted? Is it 0, 1 or capped at 21? This requires clarification.

6. Are the specific obligations on booking platforms, letting agents, hosts, guests and facilitators in the Code adequate? If not, what other obligations should be considered for each of these industry participants? Why? There is an error in 5.4.3 which states “host must hold public liability insurance that is valid for the occupancy period. This insurance must cover: (b) damage to or loss of a guest’s or visitor’s property at the premises.” Public liability does not cover property, only personal injury or death. Environmental Planning and Assessment (STRA) Regulation 2019

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9. What are potential ways to facilitate industry participants’ access to the exclusion register while limiting potential privacy impacts? What factors should be considered? The proposal of a formal exclusion register hosts and guests is very positive however this should only be available to industry participants, not the general public. If this information were made public, it could cause embarrassment and distress to those named. 20 to 29 – Registration: A central register should be held by Fair Trading since each booking platform could only record the information for those who are registered with them. This would prevent people who have say, 2 strikes, jumping to another booking platform who has no history of their conduct and continuing like they have a clean record. The information would be provided by each booking platform as a standard export from their database.

30 to 32 – Access to Registration Data: Public access to the register has significant privacy and safety implications. There is no reason that anyone other than government and the booking platform should access to the sensitive information. This could also encourage criminal activity by allowing people to target STRA for theft (while tourists are visiting) or squatting (if the dwelling is vacant). I object in the strongest of terms to a register being made public.

#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by

insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

7. Is the complaints process detailed in part 6 of the Code sufficient? If not, what other matters should be considered or set out in the process? Why? This is very positive, however, complainants who continue to make vexatious allegations, should be subject to penalty.

Thank you for reading my submission.

Regards,  
Karina Vickery  
4 Ulan Rd  
North Lambton, Nsw 2299

**From:** Karl Edlinger <karl.edlinger@bigpond.com>  
**Sent:** Wednesday, 11 September 2019 2:20 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** rob submission 2.0, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

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I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

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Thank you for reading my submission.

Regards,  
Karl Edlinger  
12 Lake Entrance Rd  
Warilla, Nsw 2528

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Karl Edlinger  
12 Lake Entrance Rd  
Warilla, Nsw 2528



**From:** Karla Oliver <karlanankivell@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Rob submission, Air BNB run

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Thank you for reading my submission.

Regards,  
Karla Oliver  
16 Church St  
Woollooware, Nsw 2230

**From:** Karlye williamson <karlye1@hotmail.con>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because I love to share my home people so that they can enjoy Byron bay, I am also a mature age uni student with children and have no support so this is away I can continue to further my education so it is my livelihood for me and my kids

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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Thank you for reading my submission.

Regards,  
Karlye williamson  
133 Broken Head Rd  
Suffolk Park, Nsw 2481

**From:** Karyn White <kazzababy@bigpond.com>  
**Sent:** Wednesday, 11 September 2019 2:13 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

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Regards,  
Karyn White  
PO Box 89  
, Nsw 2877

**From:** Kate Behrend <mkmbehrend@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

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Kate Behrend  
Julian Rocks Dr  
Byron Bay, Nsw 2481



**From:** Kate Blanchard <kateblanchard77@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
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Kate Blanchard  
168 Marsh St  
Armidale, Nsw 2350

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**Sent:** Wednesday, 11 September 2019 2:19 PM  
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Regards,  
Kate Cooper  
43 Grove St  
Lilyfield, Nsw 2040

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**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
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Thank you for reading my submission.

Regards,  
Kate Crewes  
6 Speers Rd  
North Rocks, Nsw 2151

**From:** Kate Dezarnaulds <kate@berryworklife.com.au>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it has enabled our family to move from the stressful and expensive cbd of Sydney to a peaceful regional area where our 3 kids have space and we can grow our own veggies. Incomes for families in regional areas are so far below CBD incomes that we are forced to diversify our income to survive. AIRbnb has supported our family during our transition to regional life and supports the cash flow stresses we face as we build our own local businesses. That after 6 years now employ 12 local people on good wages. We are not the enemy and we reject the protectionist forces of hotel and traditional accommodation businesses that seek to minimise competition through over regulation of home sharing.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that

hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

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Thank you for reading my submission.

Regards,  
Kate Dezarnaulds  
140 O'Keeffes Ln  
Jaspers Brush, Nsw 2535



**From:** Kate Grob <kate.grob@savvystaffing.com.au>  
**Sent:** Wednesday, 11 September 2019 2:16 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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I host on Airbnb because...

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Thank you for reading my submission.

Regards,  
Kate Grob  
24 Bolton St  
Newcastle, Nsw 2300

**From:** Kate Reynolds <katereynolds08@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:22 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Rob submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism in Terrigal and North Avoca.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home and other properties.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

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Thank you for reading my submission.

Regards,  
Kate Reynolds  
24 Coast Rd  
North Avoca, Nsw 2260

**From:** Kate Stuart <stalbanscourthouse@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:16 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

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Thank you for reading my submission.

Regards,  
Kate Stuart  
19 Upper MacDonald Rd  
Saint Albans, Nsw 2775

**From:** Katerina Araneta <katya.araneta@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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Thank you for reading my submission.

Regards,  
Katerina Araneta  
34 Parramatta Rd  
Stanmore, Nsw 2048



**From:** Katharina Keil <kat.c.keil@icloud.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because as a freelancer it helps me pay my bills when I'm not on a production.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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Thank you for reading my submission.

Regards,  
Katharina Keil  
199 Regent St  
Redfern, Nsw 2016

**From:** Katharine Glass <kathy.glass@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because this is a right we have always had in Palm Beach. My parents rented our holiday house out back in the 1960's and 70's. We enjoy sharing our home and offering hospitality for people to experience living in this beautiful district. There are many wedding venues and beautiful sights that depend on this type of rental property as there are no motels in this area of Sydney. Airbnb is a great way to share our tourist sights without inviting overdevelopment.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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Thank you for reading my submission.

Regards,  
Katharine Glass  
916 Barrenjoey Rd  
Palm Beach, Nsw 2108

**From:** Katherine Brook <kath@flatearth.net.au>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

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Thank you for reading my submission.

Regards,  
Katherine Brook  
40 Bay St  
, Nsw 2540

**From:** no-reply@planning.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Sunday, 1 September 2019 5:56 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Purple category

Submitted on Sun, 01/09/2019 - 17:56

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Katharine

**Last name**

Glass

**Name withheld**

No

## Info

**Email**

[kathy.glass@gmail.com](mailto:kathy.glass@gmail.com)

**Suburb/Town & Postcode**

Palm Beach,2108

**Submission**

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because I like sharing my holiday house with others. I personally prefer to stay in

people's homes and where my house is situated there are no Motels. The AIRBNB industry falls into the tradition of offering rental homes in the Palm Beach area which has been the practice since my parents had a holiday house in the area in the 1960's. It is far preferable to continue this style of accommodation than allow high density accommodation facilities in this tourist dependent end of the Northern beaches.

Airbnb enables me to provide accommodation and meet the costs of owning this second home and sharing it with others. I enjoy welcoming people to this beautiful area and recommending my favourite cafes, restaurants and shops so the many small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Sincerely Katharine Glass  
916 Barrenjoey Road  
Palm Beach NSW 2108

**I agree to the above statement**

Yes

**From:** Kathleen Tan <bowralescape@gmail.com>  
**Sent:** Saturday, 17 August 2019 2:44 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Short term rental

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category, sent

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens on our operations.

As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

As holiday rentals like mine become more important to the tourism economy, it's my strong belief the NSW Government should build a regulatory solution that ensures the sector can reach its economic potential.

Thank you reading my submission.

**From:** Kathleen Tighe <katighe@yahoo.com.au>  
**Sent:** Wednesday, 11 September 2019 2:20 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

#### STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

#### Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

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Thank you for reading my submission.

Regards,  
Kathleen Tighe  
221 Copeton Dam Rd  
Inverell, Nsw 2360

**From:** Kathleen Ward <wardhk57@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:13 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because we have a beautiful home which we love sharing with others.. We would have to move as the rates are so high.. By having Airb'nb guests we are able to stay in our own home and not move .

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

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Thank you for reading my submission.

Regards,  
Kathleen Ward  
18 Camperdown St  
Coffs Harbour, NSW 2450

**From:** Kathryn Fleming <kathryn.j.fleming@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:16 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

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I host on Airbnb because...

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Thank you for reading my submission.

Regards,  
Kathryn Fleming  
17-37 Lawrence St  
Alexandria, Nsw 2015



**From:** Kathryn Leary <kleary@lindisfarne.nsw.edu.au>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

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Thank you for reading my submission.

Regards,  
Kathryn Leary  
P O Box 6893  
Terranora, Nsw 2486

**From:** Kathryn Stephenson <katie\_easyliving@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

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Thank you for reading my submission.

Regards,  
Kathryn Stephenson  
35 Narrung Pl  
Oxley Island, Nsw 2430

**From:** Kathryn Sutton <sutton.kathryn@gmail.com>  
**Sent:** Thursday, 5 September 2019 12:30 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** recorded and not sent to DCS, Purple category

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens on our operations.

As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

**From:** Kathryn White <uniquetokathy@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:21 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Rob submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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Thank you for reading my submission.

Regards,  
Kathryn White  
28 Lachlan St  
Thirroul, Nsw 2515

**From:** Kathryn Sutton <sutton.kathryn@gmail.com>  
**Sent:** Thursday, 5 September 2019 12:30 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens on our operations.

As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.



**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 3:14 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** rob submission 2.0, non Air BNB run

Submitted on Wed, 11/09/2019 - 15:13

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Kathy

**Last name**

Frame

**Name withheld**

No

## Info

**Email**

[kframe1410@gmail.com](mailto:kframe1410@gmail.com)

**Suburb/Town & Postcode**

2481

**Submission**

I would like to voice my opinion on the growing number of air b&b in the shire. I feel this increase in holiday accomodation, mostly situated in suburban areas, is an intrusion on the daily lives of the

ratepaying residents of Byron Shire in many ways. The additional noise, the irregular hours, the parking issues, the increased burden of the use of facilities, predominantly water use for our shire are just a few of the reasons against the existence of air b&b.

**I agree to the above statement**

Yes

**From:** kathy@abrighterfuture.com.au  
**Sent:** Wednesday, 21 August 2019 1:08 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** short term holiday letting

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category, sent

Hi,

I am writing as a person who lives in a suburb that is attractive to holiday makers. I rent out my family home when we go away, whether it be for weekends or for school holidays. The suburb I live in, as well as surrounding suburbs, do not have enough hotel and other types of accommodation to meet the demand.

I am writing to request increased powers or rights for those people who rent out their home. If I rent out the home that my family lives in, I realise that I am risking having a holiday maker decide to not leave, in which case I have been advised we would be unable to return to our home at the agreed time (and my kids couldn't access their school bags/clothes etc). We would have to take them to court and get a court order to have them removed (and my kids have missed school for an extended period of time as have no uniform or school bags, we have had to buy new clothes to attend work etc). I believe that holiday renters should not have the same rights as someone who has entered a rental agreement whereby the accommodation is their home for an extended period of time. My other concern is that if we have agreed to rent the house out to a particular family and give the keys (or entrance code in our case) to one of that supposed group, we are in the situation where they can invite anyone else that they want to come over and we have no control. 2 relevant examples have occurred to us.

One, a woman rented our family home, and said that she and her partner, along with 3 other couples were going to stay. Her husband contacted us and said he was arriving with the other men so they could go for a surf before the girls arrive. Turns out that it was a bucks party, we arrived home to find my kids bouncy balls with pictures of breasts on them and sex toys in the house. That was the tamer of the

2 examples I give in this email. The second example was where a man booked the house for himself, his 6 month pregnant wife, and three other couples to stay for a babymoon. Relaxing weekend planned..... Another bucks party. This time we arrived home to find a whole window frame missing, broken glass in play room, on trampoline, pushed deep in between the pieces of wood on the deck, throughout the outside wicker lounges. My husband and two kids subsequently got cut by glass that I hadn't seen in the following week. I found drugs (think cocaine) in a plastic bag under cushions (luckily I found it, not my 5 and 6 year old kids) and a bucket full of wee in a bedroom (unsure what sex game that was aimed at!) Our poor neighbours have had to put up with seeing naked women running around. We were contacted on the second occasion on the Saturday (after the first night of a two night rental) and told that there were 14 or 16 men leaving our house at 10am with beer bottles, heading towards the beach. Whilst we did not agree to rent our house out to a group of men, we had no rights as owner of the house to get them to leave. We could not call the police to assist us (my husband was too afraid to confront them) as we were told the police would only get involved if malicious damage.

PLEASE PLEASE PLEASE GIVE US RIGHTS TO GET PEOPLE OUT OF OUR HOMES IF THEY ARE NOT WHO THEY SAY THEY ARE.

There is much talk about people renting out their homes and the negative impact on their neighbours. We have amazing neighbours who are WAY TOO patient and understanding. We don't want to have people stay in our family home who are going to party away and make loud noise at night. But we have no power to get rid of people if they do.

We don't even have the right to say no to groups of 18 year old men if we are agreeing to rent our house out to others (otherwise we are breaking anti-discrimination laws - cannot say that there must be a child in the group or they must be over a certain age as we would be being age-ist!) Please help us. We need the money we get from renting out the house to pay the mortgage. Please find a way to allow us to 1. not let people rent out our house if we think they may be party animals based on their ages 2. have police assistance to remove people on our property that we did not give permission to be there (as they have lied to us about who they are)

Thanking you in advance,

Kathy

**From:** Katie Brooker <katie.brooker@mac.com>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

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Thank you for reading my submission.

Regards,  
Katie Brooker  
61-65 Bay St  
Tathra, Nsw 2550

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 11:24 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** recorded in DPIE subs register

Submitted on Wed, 11/09/2019 - 11:23

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Katie

**Last name**

Pike

**Name withheld**

No

## Info

**Email**

[info@beachesbyronbay.com.au](mailto:info@beachesbyronbay.com.au)

**Suburb/Town & Postcode**

2481

**Submission**

Airbnb host should not be able to have as much leeway in terms of rules on guest occupancy throughout the year.

**I agree to the above statement**

Yes



**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Tuesday, 10 September 2019 2:02 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Sylvia submissions, recorded in DPIE subs register, Purple category

Submitted on Tue, 10/09/2019 - 14:01

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Katie

**Last name**

Wilson

**Name withheld**

No

## Info

**Email**

[katie\\_wilson@yahoo.com](mailto:katie_wilson@yahoo.com)

**Suburb/Town & Postcode**

Byron Bay

**Submission**

I wish to submit my objection to the Short Term Holiday Rental policy that is currently being discussed.

As a long term resident and business owner in Byron Bay I can see the demise in our community and the obliteration of the accommodation sector.

We have been in the accommodation industry for over 36 years in Byron Bay and we have never seen such a decline in trade as that since AirBnB/short term holiday rentals have started up and taken over our town.

The thousands of homes that are now short term holiday rentals have killed the permanent rental market and the accommodation industry. Businesses are closing and struggling to keep open - that is a fact.

Byron Bay is the jewel in NSW crown and this policy being put forward through parliament is going to destroy the fabric of this unique and beautiful town. A 90 day cap MUST BE put in place, Council MUST BE given the power back to oversee and implement their own policies to protect our town and there needs to be a level playing field.

These holiday houses need to be made accountable, they need to be registered with the ATO, they must have to pay commercial rates, land tax, GST, DA fees etc. All the commercial rates etc that legitimate businesses are having to pay is killing them. There is no incentive to operate a business legitimately, we should all relinquish our licences and practice under these new "share economy" laws and just pay residential rates etc. which will decimate and cripple our councils funds.

Please look at other countries around the world - there are precedences everywhere in controlling these matters - Japan, New York, Spain, the list goes on.

Stand up now to AirBnB before it is too late and they destroy the jewel in NSW crown forever.

Kind Regards,  
Katie Wilson

**I agree to the above statement**

Yes

**From:** Katrina Bradley <katrina\_bradley@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it gives me the opportunity to earn extra money.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Katrina Bradley  
15 Thompsons Rd  
Pokolbin, Nsw 2320

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 4:30 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Rob submission 3.0, non Air BNB run

Submitted on Wed, 11/09/2019 - 16:29

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

KATRINA

**Last name**

WELCH

**Name withheld**

No

## Info

**Email**

[awsduffys@gmail.com](mailto:awsduffys@gmail.com)

**Suburb/Town & Postcode**

2535

**Submission**

To Whom It May Concern

I STRONGLY object to being told how many people I am allowed to accommodate in my house. Regardless of the fact that I choose to currently rent our property as short term rental, this is bordering on complete over-governing ie. SOCIALISM at it's best (or worst).

To OUTLAW a bunk room? Are you joking?

A maximum of 12 guests in a house that might sleep 14 or 16. HOW DARE YOU - who even thinks up these ridiculous rulings and limitations?

How have you decided that 12 guests in a house should be a maximum?

For your information, we have a large house that sleeps 14. One bedroom is a bunk room (extremely popular for children and families). Another is a HUGE upstairs room that sleeps 4 people. The remainder of the accommodation comprises of 3 bedrooms that sleep 2 people per bedroom.

Should this legislation be passed then I will seek compensation from the NSW Government for loss of earnings and loss of freedom of choice. We have voted and we live in a democratic society - how dare the NSW Government dictate how many people are allowed to occupy a house.

I would appreciate your response to my appeal.

Regards  
Katrina Welch

**I agree to the above statement**

Yes

**From:** Kaye Marshall <kayemarshall06@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because as a retired person with little super it supplements our income.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Kaye Marshall  
3 Clements Dr  
Avoca Beach, Nsw 2251



---

Kayla Technologies Pty Ltd (t/a Hometime)  
161 Castlereagh St, Sydney  
NSW 2000

Att: Director, Housing and Infrastructure Policy  
NSW Department of Planning, Industry and Environment

**Re: Proposed STRA Rules for NSW**

**Hometime Submission**

Thank you for the opportunity to comment on the Proposed STRA Rules for NSW. As the largest Airbnb property manager in NSW, we are grateful for the opportunity to provide context and constructive feedback on the proposed regulatory changes.

**Summary**

- Hometime welcomes a fair and considered STRA regulatory environment in NSW that promotes a sustainable STR industry, fosters a professional ecosystem and is easy to navigate and comply with
- Hometime supports the proposed 180 night cap, although our support of this particular matter is contingent on exemption of stays of 21 nights or more not counting to the cap
- Safety of our guests, neighbours and the community is paramount. However, we would like to see that specific fire safety proposals are inline with current residential requirements set out by body corporates and relevant fire safety standards. We also feel the proposed smoke alarm & lighting requirements are too costly for the average household to afford, thereby rendering them unable to participate in the STRA market
- Hometime opposes the STRA property register on the basis it will add needless complexity and cost to the process and will create an onerous administrative requirement
- The Code of Conduct is fair and representative of our views, however we ask that it be amended to allow hosts to be covered by insurance directly provided by a booking platform



- Hometime supports a review of the proposed STRA rules following 12 months of implementation.
- Hometime believes that increasing compliance costs for STRA will make it more costly to holiday makers in NSW. We see STRA as an important, distributed, low cost option for tourists in NSW and that any cost increases in providing the accommodation will have a significantly negative affect the local economy

## About Hometime

Hometime began as a small company with big ambitions. Two friends who started a cleaning company that turned into an international startup success story in just 4 years. The tremendous growth of Hometime comes off the back of the incredible demand from Homeowners and Guests alike who relish the opportunity to share their homes and be hosted in a new area.

As the company has matured we have changed our core offering. We are no longer just a management company providing cleaning and guest services. We have transformed into a platform which mentors small business owners and provides them the tools and resources they need to run their own portfolio of Airbnbs. We are helping to foster a new class of micro entrepreneurs who are able to run their own lifestyle business with the opportunity to generate great income.

At Hometime, we love that no two hosts, and no two properties are the same. We put a tremendous amount of time and effort into managing our host's homes and guests because we know great experiences lead to glowing reviews. This is demonstrated by our fantastic track record after hosting more than 350,000 guests and maintaining an average rating of 4.8 stars out of 5.

Overall we welcome the move to regulate the industry to keep it fair for everyone, however we are concerned that NSW Government's proposed short-term rental accommodation (STRA) rules are taking it to far and will make it difficult for Hometime to viably share the homes of our homeowners.

We represent over 1,000+ active hosts in Australia with the largest portion of them being based in NSW. The majority of our hosts are regular home owners trying to make the most of their assets while balancing personal needs. Some may want to offset their holiday expenses whilst travelling, others are business travellers who want to utilise their assets when they are working interstate -- full-service property management companies like Hometime provide a unique solution for them to do just that.

At Hometime we go to great lengths to ensure a healthy ecosystem of happy guests, owners and neighbours is maintained. If we are not keeping all stakeholders happy then we will not have a thriving business. We offer our guests and homeowners 24/7 communication channels 365 days of the year so that in the event there is a problem we can have it resolved around the clock. We also heavily vet our guests so that we can provide our homeowners peace of mind and ensure that damage and distraction to neighbours is reduced. We have a zero tolerance policy on bad behaviour and we are constantly improving our systems and processes to ensure that bad behaviour is minimised.

We currently employ 25 full time employees in Australia, provide full time work to 40 contracted property managers and casual or part time work to over 100 cleaners. Additionally we also provide casual work to a number of photographers, stylists, handymen and tradespeople. We see our impact on the Australian economy as positive and our continued rapid growth means further job and value creation within the NSW economy. Many of the suggestions outlined below will severely inhibit our opportunity to operate at scale in NSW and may force us to move our headquarters and attention to states with more favourable regulation.

We are glad that the government has been so open to receiving feedback and allowing us a voice in this discussion. Generally we support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, we want to comment on the following:

## **STRA State Environmental Planning Policy**

Hometime does not support the requirement that hosts need complying development permits. This expensive permit will be a large burden on many of our hosts and make hosting out of reach for the average homeowner who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. This is also inclusive of the potentially burdensome time component of getting the permit. Often home sharing is very time sensitive and for hosts who share their home for a few weeks a year, this is a significant barrier to entry and will make hosting uneconomical. Traditionally holiday homes up and down the coast, and in regional areas, have existed for decades without these expensive permits without issues. The net result will only end up making holidays across NSW more expensive, potentially driving tourism to different states and territories where accommodation is much cheaper. This will ultimately have the biggest effect on families wishing to holiday in NSW.

## **Environmental Planning and Assessment (STRA) Regulation 2019**

Hometime does not support the unrealistic requirements to which will introduce red tape and force potential hosts to make costly alterations to their homes before hosting, such as expensive

lighting and fire detection systems. Both South Australia and Tasmania have stated clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if a house is approved to be safe for an owner and their family to live in, it's safe for guests.

We support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of Hosts homes for home sharing
- Mandate smoke alarms – either battery operated or hard-wired but ultimately in line with the requirements of the body corporate and relevant residential fire safety standards
- Require evacuation or emergency plans and guest education

## **STRA Property Register**

Hometime does not support the potentially costly, complex, and onerous STRA property register. We do not believe that it will have any material effect on the industry that is positive. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework. This would also be very difficult to enforce should rogue hosts choose to host on fringe booking platforms.

## **Code of Conduct**

Hometime supports the proposed Code of Conduct which overall is fair, reasonable and representative of the home sharing community. It seems to provide strong protections for hosts and guests from vexatious or frivolous complaints. We ask that the Government amend the Code to allow hosts to be covered by insurance directly provided by a booking platform.

## **Yearly Caps on nights booked**

We support the need for a restriction of 180 nights booked per year. However our support is contingent on the inclusion of the recent changes to allow stays of 21 nights or more not counting to the cap. These medium term stays are often booked by business travellers, relocating families, students doing terms abroad and locals who are in between housing. As such they are generally having a positive impact on local communities and economies.



We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration. Ultimately the more costly it becomes to provide home sharing in NSW for owners the more costly it will become for holiday makers. Should this balance be tipped to far it will drive tourists out of NSW in search of more affordable options. Considering NSW is already the most expensive state in Australia to find accomodation we believe this could have a detrimental effect on the local economy.

Thank you for taking the time to review and consider our submission. We hope to work with the Government in relation to these issues in the future, and would be pleased to engage further should someone wish to reach out to us directly.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'William Crock', is written over a light blue horizontal line.

William Crock  
Co-founder  
Hometime  
[william@hometime.io](mailto:william@hometime.io)  
0450 443 895

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Tuesday, 10 September 2019 12:17 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Sylvia submissions, recorded in DPIE subs register, Purple category

Submitted on Tue, 10/09/2019 - 12:15

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

**First name**

William

**Last name**

Crock

**Name withheld**

No

## Info

**Email**

[william@hometime.io](mailto:william@hometime.io)

**Suburb/Town & Postcode**

2000

**Submission file**

[hometime-submission-for-proposed-str-rules-in-nsw.pdf](#)

## **Submission**

Kayla Technologies Pty Ltd (t/a Hometime)  
161 Castlereagh St, Sydney  
NSW 2000

Att: Director, Housing and Infrastructure Policy  
NSW Department of Planning, Industry and Environment

Re: Proposed STRA Rules for NSW

Hometime Submission

Thank you for the opportunity to comment on the Proposed STRA Rules for NSW. As the largest Airbnb property manager in NSW, we are grateful for the opportunity to provide context and constructive feedback on the proposed regulatory changes.

### **Summary**

Hometime welcomes a fair and considered STRA regulatory environment in NSW that promotes a sustainable STR industry, fosters a professional ecosystem and is easy to navigate and comply with

Hometime supports the proposed 180 night cap, although our support of this particular matter is contingent on exemption of stays of 21 nights or more not counting to the cap

Safety of our guests, neighbours and the community is paramount. However, we would like to see that specific fire safety proposals are inline with current residential requirements set out by body corporates and relevant fire safety standards. We also feel the proposed smoke alarm & lighting requirements are too costly for the average household to afford, thereby rendering them unable to participate in the STRA market

Hometime opposes the STRA property register on the basis it will add needless complexity and cost to the process and will create an onerous administrative requirement

The Code of Conduct is fair and representative of our views, however we ask that it be amended to allow hosts to be covered by insurance directly provided by a booking platform

Hometime supports a review of the proposed STRA rules following 12 months of implementation.

Hometime believes that increasing compliance costs for STRA will make it more costly to holiday makers in NSW. We see STRA as an important, distributed, low cost option for tourists in NSW and that any cost

increases in providing the accommodation will have a significantly negative affect the local economy

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Overall we welcome the move to regulate the industry to keep it fair for everyone, however we are concerned that NSW Government's proposed short-term rental accommodation (STRA) rules are taking it to far and will make it difficult for Hometime to viably share the homes of our homeowners.

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Specifically, we want to comment on the following:

#### STRA State Environmental Planning Policy

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#### Environmental Planning and Assessment (STRA) Regulation 2019

Hometime does not support the unrealistic requirements to which will introduce red tape and force potential hosts to make costly alterations to their homes before hosting, such as expensive lighting and fire detection systems. Both South Australia and Tasmania have stated clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if a house is approved to be safe for and owner and their family to live in, it's safe for guests.

We support the NSW Government streamlining safety regulations which:

Respect the ancillary use of Hosts homes for home sharing

Mandate smoke alarms – either battery operated or hard-wired but ultimately in line with the requirements of the body corporate and relevant residential fire safety standards

Require evacuation or emergency plans and guest education

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#### Yearly Caps on nights booked

We support the need for a restriction of 180 nights booked per year. However our support is contingent on the inclusion of the recent changes to allow stays of 21 nights or more not counting to the cap. These medium term stays are often booked by business travellers, relocating families, students doing terms abroad and locals who are in between housing. As such they are generally having a positive impact on local communities and economies.

We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration. Ultimately the more costly it becomes to provide home sharing in NSW for owners the more costly it will become for holiday makers. Should this balance be tipped too far it will drive tourists out of NSW in search of more affordable options. Considering NSW is already the most expensive state in Australia to find accommodation we believe this could have a detrimental effect on the local economy.

Thank you for taking the time to review and consider our submission. We hope to work with the Government in relation to these issues in the future, and would be pleased to engage further should someone wish to reach out to us directly.

Yours sincerely,

William Crock  
Co-founder  
Hometime  
william@hometime.io  
0450 443 895

**I agree to the above statement**

Yes

**From:** Kaylyn Welsh <kwelsh@iinet.net.au>  
**Sent:** Wednesday, 11 September 2019 2:16 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

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- Respect the ancillary use of my home for home sharing
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Thank you for reading my submission.

Regards,  
Kaylyn Welsh  
4 Batehaven Rd  
Batehaven, Nsw 2536

**From:** Kaz Copeland <alburywodongaluxuryhomes@hmail.com>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

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Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

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Thank you for reading my submission.

Regards,  
Kaz Copeland  
30 Mace Ct  
Glenroy, Nsw 2640

**From:** kaz Selbie <kazselbie@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:16 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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Thank you for reading my submission.

Regards,  
kaz Selbie  
59 Valla Beach Rd  
Valla Beach, Nsw 2448



**From:** Keira Bourke <keira.bourke1@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

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Thank you for reading my submission.

Regards,  
Keira Bourke  
4 Alice St  
Merewether, Nsw 2291

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 10:16 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Rob submission 3.0, non Air BNB run

Submitted on Wed, 11/09/2019 - 22:15

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

**First name**

Keith

**Last name**

Learn

**Name withheld**

No

## Info

**Email**

[keithbarb09@gmail.com](mailto:keithbarb09@gmail.com)

**Suburb/Town & Postcode**

Kangaroo Valley 2577

**Submission**

Do not agree with STRA self regulation or registration

- hasn't worked in the past
- no hands on control -distance-
- no community input or complaint register
- no local enforcement of local bylaws or risk conditions -fire risks, flood risks, no. of occupants,noise etc.
- little contribution to local infrastructure-ambulance,hospital, roads, police etc. Usually Involves multiple families and cars.
- property rates should be based business rates not residential rates- see below.

Possible solutions :

Let Councils manage but only if fully financialy compensated.

#### Compensating Councils

- all STRA accommodations should have to submit a 'Development Application' with appropriate fees.
- a yearly fee should also apply , sufficient to hire compliance officers to check for booking register, facility standards, complaints investigations, safety regulations and enforcement of occupancy standards.
- all STRA should pay 'business rates on the entire property as they are 'businesses

Conclusion:

-This would make a fairer competitive solution for existing DA compliant tourist operators and the suffering neighbours.

Keith Learn  
Chairman of Development Committee  
Kangaroo Valley Community Association Inc.

**I agree to the above statement**

Yes

**From:** Keith Rodger <rodgerk43@yahoo.com>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

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Thank you for reading my submission.

Regards,  
Keith Rodger  
14 Gibbons St  
Oatlands, Nsw 2117

**From:** Kellie brooks <smelvin86@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

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Thank you for reading my submission.

Regards,  
Kellie brooks  
2 King George Parade  
Forster, Nsw 2428



**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Monday, 9 September 2019 5:21 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Tessa Submissions, recorded in DPIE subs register, Purple category

Submitted on Mon, 09/09/2019 - 17:20

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

kellie

**Last name**

odonnell

**Name withheld**

No

## Info

**Email**

[kel\\_odonnell@hotmail.com](mailto:kel_odonnell@hotmail.com)

**Suburb/Town & Postcode**

Byron Bay

**Submission**

Please closely consider the Byron Shire when making reforms around capping Short term Accommodation options.

It's my opinion that Byron needs to have strict laws around letting out whole houses on Air BnB. I believe the shire needs the 90 day cap on short term let or even a shorter cap like 60 days. This will support the local families to be able to rent and buy within our community. The devastation to families that have had to move after years of settling here is real! Not to mention the atrocity of seeing families live in a caravan park or single people living out of their car. This is a very real issue happening in our shire daily. As someone who supports young people to find jobs and housing in the area, it is impossible to help young people born here to become independent people living and working in society when there are NO AFFORDABLE rentals..!

Please consider capping and regulating the Byron Shires, short term holiday letting to a 90 or 60 days limit with no exceptions for a 21 day loophole!!

**I agree to the above statement**

Yes

**From:** Kelly Jamieson <kjamieson@integrityre.com.au>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it helps us to make an income and provide a better life for my family. It also brings visitors to our area which helps locals & their businesses too.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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Thank you for reading my submission.

Regards,  
Kelly Jamieson  
90 Worrigeer St  
Nowra, Nsw 2541

**From:** Kelvin Xu <nicyxjy@hotmail.com>  
**Sent:** Tuesday, 10 September 2019 8:02 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

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Regards,  
Kelvin Xu  
U 312A, 70 River Rd, Ermington, NSW  
Ermington, Nsw 2115

**From:** Kelvin Xu <ianfivedock202@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:20 PM  
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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Kelvin Xu  
50 East St  
Five Dock, Nsw 2046



**From:** Kelvin Xu <kelvinxu122prymont@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:20 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because this is the only income for me now. I have 2 babies need to take care myself so I can not have a full day work.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

#### STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

#### Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

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Thank you for reading my submission.

Regards,  
Kelvin Xu  
2-26 Wattle Cres  
Pyrmont, Nsw 2009

**From:** Kerena Tran <kerena.tran@gmail.com>  
**Sent:** Thursday, 5 September 2019 9:29 AM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

**Categories:** Purple category

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens on our operations.

As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

Warm regards,  
Kerena Tran

**From:** Kerri Lenehan <farrantlenehan@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:22 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

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I host on Airbnb because:

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Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

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I oppose the requirement for costly complying development permits. For hosts who share their home for a few weeks a year a fee paying permit is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

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I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

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Thank you for reading my submission.

Regards,  
Kerri Lenehan  
10 Wood St  
Manly, Nsw 2095

**From:** Kerrie Allen <kerrie2909@gmail.com>  
**Sent:** Saturday, 7 September 2019 9:37 AM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens on our operations.

As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

Sent from my Huawei Mobile

**From:** Kerrie Bell <kezbell@ozemail.com.au>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because... it provided me with much needed income whilst I was trying to manage a failing business.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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Thank you for reading my submission.

Regards,  
Kerrie Bell  
12 Timothy Lacey Ln  
The Oaks, Nsw 2570



**From:** Kerrie Meehan <kerriemeehan@msn.com>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

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Regards,  
Kerrie Meehan  
132 New Mount Pleasant Rd  
Mount Pleasant, Nsw 2519

**From:** Kerry gestier <kerry.gestier@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

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Thank you for reading my submission.

Regards,  
Kerry gestier  
14 McCormack St  
The Hill, Nsw 2300

**From:** no-reply@planning.nsw.gov.au on behalf of Department of Planning,  
Industry and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Monday, 19 August 2019 12:03 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Cc:** DPE PS ePlanning Mailbox  
**Subject:** Have your say on Short Term Rental Accommodation

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category

Submitted on Mon, 19/08/2019 - 12:03

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

**First name**

Kerry

**Last name**

May

**Name withheld**

No

## Info

**Email**

[kmay.sussexinlet@ljh.com.au](mailto:kmay.sussexinlet@ljh.com.au)

**Suburb/Town & Postcode**

2540

**Submission**

We are concerned that the rules about bushfire and flood affected areas may impact negatively on the holiday rentals in this area of Sussex Inlet and Berrara. This is an area of 25% unemployment and we depend on the income of holiday rentals to boost employment and income to the local businesses in the area at holiday times.

We are an area that has been impacted by floods and bushfires but the local area has developed a strategic plan for evacuation and management in these situations. We feel that if the regulations prevent holiday letting in these areas it could severely impact not only our regional area but also others.

These regional areas are already suffering from drought and lack of NBN facilities. We do not need another blow to our economy and community.

**I agree to the above statement**

Yes

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This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it immediately.

Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the NSW Office of Environment and Heritage.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

The Elan  
1 Kings Cross Rd  
Darlinghurst 2010  
September 10, 2019

## **NSW GOVERNMENT PROPOSAL FOR SHORT TERM RENTAL ACCOMMODATION IN NSW (August 2019)**

As Secretary of the Elan Strata Committee elected by the Owners Corporation, I write on behalf of the residents of the Elan, a residential strata plan of 275 apartments over 38 floors, with approximately 450 plus owner-occupiers and tenants.

The Elan is situated in Kings Cross Rd Darlinghurst and our by-laws for over 20 years have prohibited short term letting. The proposed changes are of great significance to our residents, presenting an unnecessary risk to our Strata Plan. STRA is not a 'minor impact' in residential strata.

As proposed, the changes to STRA essentially re-write the NSW strata housing model that has been successful for the past 60 years and open the Elan to tourist and visitor accommodation without need for planning permission or control. The proposed Code of Conduct ignores the major impact of STRA on planning issues, increased costs, security, privacy, and the ability of the Strata Committee to meet legal obligations under the NSW Strata Act. The proposals contradict the essence of NSW strata management, which requires an Owners Corporation and their Strata Committee to control strata plans.

### **Costs to Owners Corporation**

A disproportionate cost will be borne by non STRA owners and the Owners' Corporation in residential strata buildings with STRA operations. Concierge workload, wear and tear on lifts, gyms and other utility areas, administration and management costs will increase due to increased changeover in the numbers of residents throughout the building. In NSW, "serviced apartments" and complying "B&B" in mixed-use areas must currently meet stringent conditions for segregation of lifts and floors, and often Owners Corporation approval. STRA in NSW now do not. Unless these issues are addressed, owner/occupiers, and investors with residential tenants, will be significantly subsidising the business models of those running STRA business, while having no power to monitor the number or place of STRA within their strata building.

### **Complying Development**

The proposal for short term letting to be classified as "exempt development" will turn apartment communities into quasi-hotels without any of the limitations or controls that currently exist under NSW planning law. All STRA needs to be classified as "complying development" so that Local Council is able to ensure fire safety standards are adhered to.

Fire safety in residential strata schemes must not be left to the self-regulating and fragmented industry of amateur hosts or platforms. Self-regulation poses an unacceptable risk to all strata residents, including STRA 'guests.'

It is not possible for an Owners' Corporation to know whether fire safety upgrades have been undertaken or whether the work meets the required standard, whether such work has damaged common property, or whether it interferes with the building's existing fire safety system.

Therefore, in order to ensure mandatory fire safety standards are met, all STRA in every residential Strata scheme needs to be complying, not exempt development, and why inspection must be by Local Council or a licenced certifier.

### Un-hosted Day Limits

Allowing short term letting in the absence of existing planning restrictions, and Owners Corporation control, ignores the shared structure, legal responsibility and intrinsic nature of Strata Plans.

We do not want un-hosted STRA in residential Strata schemes. At a maximum, STRA in residential strata schemes must be capped at 60 days for the Greater Sydney Region. Under the proposed change a 'host' can apply for consent to increase the already excessive 180-day cap for a 'non-complying' development. The reduction in days allowed would help contain STRA as 'home sharing', not commercial business.

STRA in a Principal Place of Residence category allows a permanent resident in a Strata scheme to conduct un-hosted STRA for 21 days without it counting toward the cap, in addition to 180 days in a single year. This pushes the boundaries of what is a principal place of residence in a residential strata scheme, and when is sharing in essence a commercial tourist business? Volunteer Strata committees cannot monitor compliance. The assumption that a 21day stay is less intrusive or disruptive is fallacious - STRA 'guests' are not neighbours. All un-hosted STRA must count toward the maximum cap without exceptions.

### Residential Strata Schemes Register

STRA must be registered by an independent body. The planning law changes should not start without a Government run register or at least, a neutral platform that is not part of the short-term letting industry. In addition, registration for STRA in a Strata scheme with a by-law currently prohibiting STRA must be prohibited.

An enforceable obligation for Hosts to register their premises before it is listed and used for STRA purposes is essential. This should be part of the planning law criteria, so it is clear the use of unregistered premises for STRA is illegal and penalties apply. The Host must display the unique Host ID on all listings.



There must also be a legal obligation for Platforms and agents not to list an unregistered residential dwelling for STRA. Platforms must also have an obligation to share data with state and local government. All listings and other advertising must display clearly the Host's unique ID.

The Register needs to identify STRA properties, including address, location, number of rooms and days availability, reporting on days of occupation (caps), and the Host must disclose all the platforms on which the premises is listed. Local Councils must be involved in designing the system and have unimpeded access to data. The Register needs to generate a unique Host ID. The register must be easily accessible to residential Owners Corporations so that they can meet the relevant legal obligations.

Local Councils must have flexibility to set a lower cap and apply zoning restrictions to meet their strategic planning objectives.

Residential Strata schemes must have access to the Register and authority to levy charges and fees to Hosts conducting STRA.

Questions:

What specific authority and pathway will our Owners Corporation have in regard to addressing the following issues that will arise -

Responsibility for breaches of By-laws by 'guests' and extra non-registered 'guests' or visitors in STRA

Non-compliance with fire regulations

Misuse or damage to common property

Safety and security of children and elderly who live in residential strata

The STRA changes as proposed do not allow Owners Corporations the autonomy, democratic right to self-determination, regulation or power and authority to ameliorate the financial and social burden of STRA that have been imposed upon us. Owners Corporations and their volunteer Strata Committees will no longer be able to confidently meet their legal obligations under NSW Strata law, which will damage residential strata as we know it in NSW. Our homes will no longer be ours.

Yours truly,  
Kerry Needs

—



**Code of Conduct p.9 ff important**



## Apple Podcast Chat All about apartment living

Just when you thought it was safe to dip your toe into the Airbnb discussion, it turns out the proposed new laws are not what they seem. The 180-day cap on whole-home lets can be extended by your local council, there's a mysterious 21-night option that doesn't count against the cap and Airbnb is gearing up to fight really tough fire safety regulations (which are fine by Stayz, by the way). This week's podcast welcomes Deputy Chair of the Owners Corporation Network Jane Hearn who gives us a fascinating insight into the loopholes and pitfalls lurking in the new short-term holiday letting regulations that are currently up for discussion. It's an interesting perspective. The government has allowed itself to be corralled into focussing on the social impact of holiday lets – noise and disruption – at the expense of, arguably, more serious issues like the impact on rents, housing availability and the “hollowing” of our cities where prime properties are given over to holiday lets. It's quite clear that the Government's attempts to mould one-size-fits-all regulations into the various needs of rural,

coastal, inner city communities, living in houses and apartments, is likely to make no one happy. The influence of outside forces on the liveability of our homes seems to be of zero concern compared to the revenue from tourist dollars. Once again, apartment residents are a cash cow for the government, or perhaps we are geese whose golden eggs are staring to crack like jerry-built apartment blocks. One thing to come out of the podcast is for everyone who doesn't want short-term letting in their buildings and who doesn't have a holiday letting by-law on their books to get one now. The OCN has devised an off-the-peg by-law that you can buy for a fifth of the normal fees – and this one will stick through any legal challenges the online letting agencies can throw at them (it says here). But seriously, once the regs are in place, the next battleground for apartment blocks will be by-laws and you can bet that any strata building that that doesn't already have one, and where short-term lets are a growing issue, is suddenly going to find 25 percent of owners rocking up to general meetings, in person or by proxy, to make sure that mothership in San Francisco doesn't lose any prime properties that can be kept open. Does that sound a little bit paranoid? Look at the 300-plus identical Astroturf (fake grassroots) letters already sent to Planning NSW to object to the regulations we are now discussing. And if Crazy JimmyT doesn't fire you up, have a listen to Jane Hearn – a calm voice of experience and reason that will scare the proxies off you! Finally, you can make your submission to the discussion process by going to the Planning NSW portal. Don't wait – you only have till September 11.

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 3:52 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Rob submission 3.0, non Air BNB run

Submitted on Wed, 11/09/2019 - 15:34

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

**First name**

Kerry

**Last name**

Needs

**Name withheld**

No

## Info

**Email**

[kerrygovorko@hotmail.com](mailto:kerrygovorko@hotmail.com)

**Suburb/Town & Postcode**

2010

**Submission file**

[the-elan-sthl-2019-submission.docx](#)

**Submission**

The Elan  
1 Kings Cross Rd  
Darlinghurst 2010  
September 10, 2019

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As proposed, the changes to STRA essentially re-write the NSW strata housing model that has been successful for the past 60 years and open the Elan to tourist and visitor accommodation without need for planning permission or control. The proposed Code of Conduct ignores the major impact of STRA on planning issues, increased costs, security, privacy, and the ability of the Strata Committee to meet legal obligations under the NSW Strata Act. The proposals contradict the essence of NSW strata management, which requires an Owners Corporation and their Strata Committee to control strata plans.

**Costs to Owners Corporation**

A disproportionate cost will be borne by non STRA owners and the Owners Corporation in residential strata buildings with STRA operations. Concierge workload, wear and tear on lifts, gyms and other utility areas, administration and management costs will increase due to increased changeover in the numbers of residents throughout the building. In NSW, "serviced apartments" and complying "B&B" in mixed-use areas must currently meet stringent conditions for segregation of lifts and floors, and often Owners Corporation approval. STRA in NSW now does not. Unless these issues are addressed, owner/occupiers, and investors with residential tenants, will be significantly subsidising the business models of those running STRA business, while having no power to monitor the number or place of STRA within their strata building.

**Complying Development**

The proposal for short term letting to be classified as "exempt development" will turn apartment communities into quasi-hotels without any of the limitations or controls that currently exist under NSW planning law. All STRA needs to be classified as "complying development" so that Local Council is able to ensure fire safety standards are adhered to appropriately.

Fire safety in residential strata schemes must not be left to the self-regulating and fragmented industry of amateur hosts or platforms. Self-regulation poses an unacceptable risk to all strata residents,

including STRA 'guests.'

It is not possible for an Owners' Corporation to know whether fire safety upgrades have been undertaken or whether the work meets the required standard, whether such work has damaged common property, or whether it interferes with the building's existing fire safety system.

Therefore, in order to ensure mandatory fire safety standards are met, all STRA in every residential Strata scheme needs to be complying, not exempt development, and why inspection must be by Local Council or a licenced certifier.

#### Un-hosted Day Limits

Allowing short term letting in the absence of existing planning restrictions, and Owners Corporation control, ignores the shared structure, legal responsibility and intrinsic nature of Strata Plans.

We do not want un-hosted STRA in residential Strata schemes. At a maximum, STRA in residential strata schemes must be capped at 60 days for the Greater Sydney Region. Under the proposed change a 'host' can apply for consent to increase the already excessive 180-day cap for a 'non-complying' development. The reduction in days allowed would help contain STRA as 'home sharing', not commercial business.

STRA in a Principal Place of Residence category allows a permanent resident in a Strata scheme to conduct un-hosted STRA for 21 days without it counting toward the cap, in addition to 180 days in a single year. This pushes the boundaries of what is a principal place of residence in a residential strata scheme, and when is sharing in essence a commercial tourist business? Volunteer Strata committees cannot monitor compliance. The assumption that a 21day stay is less intrusive or disruptive is fallacious - STRA 'guests' are not neighbours. All un-hosted STRA must count toward the maximum cap without exceptions.

#### Residential Strata Schemes Register

STRA must be registered by an independent body. The planning law changes should not start without a Government run register or at least, a neutral platform that is not part of the short-term letting industry. In addition, registration for STRA in a Strata scheme with a by-law currently prohibiting STRA must be prohibited.

An enforceable obligation for Hosts to register their premises before it is listed and used for STRA purposes is essential. This should be part of the planning law criteria, so it is clear the use of unregistered premises for STRA is illegal and penalties apply. The Host must display the unique Host ID on all listings.

There must also be a legal obligation for Platforms and agents not to list an unregistered residential dwelling for STRA. Platforms must also have an obligation to share data with state and local government. All listings and other advertising must display clearly the Host's unique ID.

The Register needs to identify STRA properties, including address, location, number of rooms and days availability, reporting on days of occupation (caps), and the Host must disclose all the platforms on which the premises is listed. Local Councils must be involved in designing the system and have

unimpeded access to data. The Register needs to generate a unique Host ID. The register must be easily accessible to residential Owners Corporations so that they can meet the relevant legal obligations.

Local Councils must have flexibility to set a lower cap and apply zoning restrictions to meet their strategic planning objectives.

Residential Strata schemes must have access to the Register and authority to levy charges and fees to Hosts conducting STRA.

Questions:

What specific authority and pathway will our Owners Corporation have in regard to addressing the following issues that will arise -

Responsibility for breaches of By-laws by 'guests' and extra non-registered 'guests' or visitors in STRA

Non-compliance with fire regulations

Misuse or damage to common property

Safety and security of children and elderly who live in residential strata

The STRA changes as proposed do not allow Owners Corporations the autonomy, democratic right to self-determination, regulation or power and authority to ameliorate the financial and social burden of STRA that have been imposed upon us. Owners Corporations and their volunteer Strata Committees will no longer be able to confidently meet their legal obligations under NSW Strata law, which will damage residential strata as we know it in NSW. Our homes will no longer be ours.

Yours truly,

Kerry Needs

**I agree to the above statement**

Yes

**From:** Kerry Purnell <indiablue27@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:21 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education



## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Kerry Purnell  
Sunrise Blvd  
Byron Bay, Nsw 2481

**From:** Kerryl Davie <kdavie63@inet.net.au>  
**Sent:** Wednesday, 11 September 2019 2:16 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

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Thank you for reading my submission.

Regards,  
Kerryl Davie  
3 Reid St  
Tomakin, Nsw 2537

**From:** Kerry-Lee Foord <oceanzedge.gerroa@me.com>  
**Sent:** Thursday, 5 September 2019 8:56 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens on our operations.

As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

I particularly object to -

- *Installation of smoke alarms in each bedroom, and the smoke alarms are interconnected where there is more than one alarm.*
- *Installation of a lighting system in hallways that is activated by the smoke alarm system.*

I have a smoke alarm upstairs and downstairs of my house, which I believe is entirely satisfactory.

Regards  
Kerry-Lee Foord  
[www.oceanzedge.com](http://www.oceanzedge.com)  
Tel 02 9810 5651  
Mob 0423 928 420

**From:** Kerstin Bilgmann <bilgmann.k@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

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Thank you for reading my submission.

Regards,  
Kerstin Bilgmann  
128 Ramsgate Ave  
North Bondi, Nsw 2026

**From:** Kevin Askew <kevinaskew@yahoo.com>  
**Sent:** Sunday, 8 September 2019 5:28 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

Dear Minister, Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry. As a result, regulation for our sector should avoid unnecessary burdens on our operations. As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

**From:** Kevin Askew <kevinaskew@yahoo.com>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

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Thank you for reading my submission.

Regards,  
Kevin Askew  
14 Ross Ave  
Narrawallee, Nsw 2539

# STRA Code of Conduct & Registration Feedback

Topic	Question
Planning instruments	<p>1. What is your view on the form of and provisions in the STRA SEPP, Regulation and Safety Standard?</p> <p>All dwellings –</p> <ul style="list-style-type: none"> <li>• Agree no more than 2 persons per bedroom / 12 persons per property.</li> <li>• Agree to smoke alarms</li> <li>• Don't agree with lighting of hallway unless it is part of the smoke alarm itself – overkill</li> </ul> <p>Multi unit –</p> <ul style="list-style-type: none"> <li>• Agree but believe that all external doors for ALL properties should be openable without a key internally</li> <li>• Agree but believe that fire extinguishers &amp; fire blanket in kitchen for ALL properties</li> <li>• Agree with evacuation signage</li> </ul> <p>Standalone dwellings</p> <ul style="list-style-type: none"> <li>• Agree with heat detector when garage is not accessible by guest and underneath the property</li> </ul>
	<p>2. Are there any elements of the draft instrument that are open to misinterpretation or require further clarification?</p> <p>No</p>
	<p>3. What are your views on new policy elements relating to days, flood control lots and bushfire prone land?</p> <p>Byron Shire Council (BSC) are proposing to reduce STRA to 90 days or less shire wide. BSC is required to prepare “a planning proposal to identify or reduce the number of days that non-hosted short-term rental accommodation may be carried out in parts of its local government area”, as per Ministerial Direction 3.7. They are putting forward via this submission process a request to reduce all holiday letting in Byron Shire to 180 days until such time as they prepare the planning proposal referenced above. They have not made any contact with any relevant parties in determining the impact that this will definitely have on the economy of the towns of the Shire. They are only focused on issues that are experienced in the town of Byron Bay, and not on the detrimental tourism &amp; economic impacts on the other towns eg. Brunswick Heads, New Brighton, South Golden Beach, Bangalow, etc..</p> <p>We agree with the restriction not being imposed in the Byron Shire, except if deemed necessary in Byron Bay itself, which leaves the number of lettable days at 365 days per year.</p> <p>Due to council's negative view on STRA as a whole, we have concerns around council's involvement when determining a properties complying development eligibility.</p> <p>We agree in principal with the flood &amp; fire safety requirements but need to determine the extent of the impact for our local area as we are surrounded by bush &amp; the majority of the Northern Rivers is flood susceptible.</p>

Code: Industry participants' obligations	<p>4. Are the general obligations for industry participants adequate? If not, what other general obligations should be considered? Why?</p> <p>Yes</p> <p>5. What types of STRA information will be useful for the Secretary to collect to inform the further improvement of the Code and the STRA regulatory framework? Why?</p> <p>The Secretary could ask for a copy of participants complaint registers to determine the type &amp; extent of complaints experienced to date.</p> <p>Ours, for example, will show how little of a problem the North Byron Shire is experiencing.</p> <p>6. Are the specific obligations on booking platforms, letting agents, hosts, guests and facilitators in the Code adequate? If not, what other obligations should be considered for each of these industry participants? Why?</p> <p>Yes in relation to guests, booking platforms &amp; letting agents.</p> <p>We do not agree with Hosts having to have insurance that covers the Guests &amp; their visitors belongings. How can a host be liable if a guest leaves the front door open and something is stolen, for example? This surely falls under travel insurance</p>
Code: Complaints	<p>7. Is the complaints process detailed in part 6 of the Code sufficient? If not, what other matters should be considered or set out in the process? Why?</p> <p>No</p> <p>All complaints must go to the host / letting agent first in order to be given the opportunity to rectify any concerns within a reasonable amount of time. If the issue continues to be a problem, this is when the Commissioner should become involved.</p>
Code: Compliance and Enforcement	<p>8. Are the grounds for recording a strike fair and reasonable? What other matters (if any) should the Commissioner consider when deciding whether to record a strike? Why?</p> <p>Yes, in theory. However, we have concerns around what determines whether the complaint is legitimate. And how whether the expectations of a guest is realistic when viewing a property online, for example, as opposed to actually viewing the house in person. It is understood that a property can not be misrepresented but still at times a persons perception may differ from what is reality</p> <p>Another concern we have is if person A is on the exclusion register so they get person B to make the booking. When taking bookings we only enter 1 persons details, not all the parties that will be holidaying in the property.</p> <p>9. What are potential ways to facilitate industry participants' access to the exclusion register while limiting potential privacy impacts? What factors should be considered?</p> <p>All participants hold a registration number. These numbers are checkable on the register. This number will advise whether the participant is excluded without providing any personal information.</p> <p>10. Is the review process clear and sufficient? What other matters (if any) should be considered? Why?</p> <p>Yes</p>

Code: Penalty notice offences and civil penalties	<p>11. Are the proposed penalty notice offence and civil penalty provisions appropriate? What provisions should or should not be identified as penalty notice offence and/or civil penalty provisions? Why?</p> <p>We find the penalties rather excessive. This is a holiday letting industry – it does not involve serious infractions like Trust Account fraud.</p>
Amendment Regulation: Prescribed classes of STRA industry participant	<p>12. Does clause 22B(1) appropriately capture end to end property management services that specifically service STRA properties? Why or why not?</p> <p>Yes</p>
	<p>13. What other organisations or persons should be prescribed classes of STRA industry participants (if any)? Why?</p> <p>None</p>
Amendment Regulation: STRA industry participants excluded from Code of Conduct	<p>14. Is it appropriate to exclude the STRA industry participants set out in clause 22C? Why or why not?</p> <p>Yes</p>
	<p>15. What other STRA operators (if any) should be excluded from being covered by the Code? Why?</p> <p>None</p>
Amendment Regulation: Appeals against listing on exclusion register	<p>16. Is the appeals process clear and sufficient? What other matters (if any) should be considered? Why?</p> <p>Yes</p>
Amendment Regulation: Fees and cost recovery	<p>17. Which industry participants should contribute to the cost of administering and enforcing the Code? Why?</p> <p>The Guest</p>
	<p>18. How should costs be apportioned across different STRA industry participants? Why?</p> <p>Registration Fee – for Guest to register</p> <p>Registration Fee – for property to register</p> <p>Administration Fee – per booking, per property paid for by Guest</p>
Amendment Regulation: Penalties	<p>19. Is the proposed penalty notice offence amount appropriate? Why or why not?</p> <p>Excessive for a first offense. Maybe it would be more appropriate to determine the penalty amount around a certain % of the booking amount that it relates to</p>
Proposed industry-led property register	<p>20. How can industry be organised to develop and manage the registration system?</p> <p>Through a STRA committee of relevant parties eg. Those listed on Appendix 2</p> <p>Those that should not be part of the STRA committee include local council members.</p>
	<p>21. What would be the costs to industry in establishing and maintaining the register? How would industry propose to meet these costs?</p> <p>Registration Fee – for Guest to register</p>

<p>Registration Fee – for property to register</p> <p>Administration Fee – per booking, per property paid for by Guest</p>
<p>22. What role should the Government play in developing or overseeing the register, if any?</p> <p>They should have a State Govt representative in the STRA committee mentioned in question 20 above</p>
<p>23. Are there other outcomes a register should deliver?</p> <p>No</p>
<p>24. How can the approach ensure registration applies to all STRA operators, regardless of how the property is advertised for rent?</p> <p>Determined by the STRA Committee</p>
<p>25. What audit and verification processes would be needed to ensure accuracy of data?</p> <p>Determined by the STRA Committee</p>

<p>26. Should there be separate or additional penalties for failure to register? If so, which industry participants should they be imposed on?</p> <p>No, covered in penalties above</p>
<p>27. What information should the register collect? Why?</p> <p>Agree – name &amp; contact details of host</p> <p>Agree – address of property</p> <p>Do not agree – it should be number of days the property is actually stayed in – <b>bookings</b> can be cancelled.</p> <p>Do not agree – that should already have been determined regarding strata compliance, by laws &amp; STRA</p> <p>Agree – but breach information should not be viewable by general public; only whether they are excluded or not</p> <p>Also on the register should be Guest name &amp; contact details</p>
<p>28. What role should different industry participants (e.g. hosts and booking platforms) play in the registration process?</p> <p>None – only once place / site to register</p>
<p>29. What role should Government play in the registration process or providing information for the register?</p> <p>None</p>
<p>30. Should any information on the register be made publicly available? If so, what information could be made available and why?</p> <p>Only whether a participant is excluded or not</p>
<p>31. Should industry be required to report registration information, including number of stays (days), to Government and/or local councils? If so, how frequently? Why?</p> <p>Not directly. They can refer to the register</p>

	<p>32. Should any information on the register be made publicly available? Why?</p> <p>Same question as 30</p>
Commencement of regulatory framework	<p>33. How much lead time would industry need to develop and establish the proposed STRA property register? Please provide reasons.</p> <p>Councils should have to apply for any request to limit number of days a holiday property is lettable prior to the establishment of the STRA register &amp; the regulatory framework.</p> <p>Holiday home owners will need to determine the viability of continuing to holiday let with the reduction in income &amp; costs associated with the compliance of the Code if the number of days a property can be let are reduced from 365.</p> <p>34. When should the STRA regulatory framework start? Please provide reasons.</p> <p>Refer question 33</p>
12-month review of regulatory framework	<p>35. Do you support the proposed scope of the review? What additional considerations might be necessary?</p> <p>Yes</p> <p>36. What data sources could the NSW Government use to inform the review? How can industry and councils assist with data collection for the review?</p> <p>Voluntary submissions from participants &amp; / or surveys issued to registered participants.</p>

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Thursday, 12 September 2019 4:24 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Tessa Submissions, non Air BNB run

Submitted on Thu, 12/09/2019 - 16:14

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

KEVIN

**Last name**

BOWE

**Name withheld**

No

## Info

**Email**

[bowekw@gmail.com](mailto:bowekw@gmail.com)

**Suburb/Town & Postcode**

New Brighton

**Submission file**

[stra-code-of-conduct-and-registration-feedback.pdf](#)

**Submission**

Restricting short term holiday rentals will have the following negative impacts

Many locals who service the properties, including cleaners and tradespersons will have their incomes reduced.

Local supply businesses will also be negatively impacted.

Families who enjoy quite and peaceful holidays may not be able to do so.

**I agree to the above statement**

Yes



**From:** Kelvin Bryant <ktb@utilityservicesaustralia.com.au>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Kelvin Bryant  
6 Cram Ave  
Young, Nsw 2594

**From:** no-reply@planning.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Wednesday, 4 September 2019 11:19 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Purple category

Submitted on Wed, 04/09/2019 - 11:18

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Terence

**Last name**

Heavener

**Name withheld**

No

## Info

**Email**

[theavener@optusnet.com.au](mailto:theavener@optusnet.com.au)

**Suburb/Town & Postcode**

Maroubra 2035

**Submission**

Advertisements for tenants should not be allowed to discriminate by targeting young singles and couples in shared accomodation which leads to to numerous late night parties.  
Councils need ample resources and powers to investigate breaches as they presently claim limited

resources.

**I agree to the above statement**

Yes

**From:** Kevin Mason <kevin@propertybuyer.com.au>  
**Sent:** Thursday, 5 September 2019 10:00 AM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

**Categories:** Purple category

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry. As a result, regulation for our sector should avoid unnecessary burdens on our operations. As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct.

However, I oppose the night limits and use restrictions for our properties, this is unfair and restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

I also oppose providing more authority to executive committee's in strata buildings giving them powers to ban short term letting as in most cases short term letting is mis-understood and I have already seen an over use of powers and bullying within the industry from over zealous executive committee's to short term let property owners.

Fire regulations should also be consistent across the board for all rental properties.

Kind Regards,

Kevin Mason  
Senior Buyers' Advocate  
M: 0419 645 862  
Ph: +61 2 9975 3311  
Fax: +61 2 9975 7944  
kevin@propertybuyer.com.au  
[www.propertybuyer.com.au](http://www.propertybuyer.com.au)  
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Winner: 2005/ 2006/ 2007/ 2008/ 2010/ 2013/ 2015 Buyers Agents Award for Excellence - REINSW

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BUYERS' AGENTS, YOUR KEY TO SMARTER BUYING – How do we work?

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**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Monday, 9 September 2019 4:43 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Tessa Submissions, recorded in DPIE subs register, Purple category

Submitted on Mon, 09/09/2019 - 16:35

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Kevin

**Last name**

Rooney

**Name withheld**

No

## Info

**Email**

[rooneykevin@hotmail.com](mailto:rooneykevin@hotmail.com)

**Suburb/Town & Postcode**

Arncliffe 2205

**Submission file**

[stra-submission-sept-2019.docx](#)

**Submission**

Please consider my attached submission.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short-term rental accommodation (STRA) regulation that supports the sharing economy" and has passed fair and balanced rules for home sharing following extensive community consultation. These common sense rules will protect people's choice to responsibly share their space without burdening them with unnecessary red tape.

However, the latest proposals are dismissing the findings of a bipartisan Inquiry, the majority of respondents who made a submission to the NSW Options Paper, the Parliament which rejected onerous registration, and the millions of locals who choose to host or stay with Airbnb. The current proposals will burden local families and small businesses with onerous red tape. It's simple – more red tape means less choice and higher prices. It would make going on a family holiday in New South Wales harder and more expensive.

Generally, I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments. Many of the issues with home sharing apply to homes where the host does not also live at the property. I can see why some of these rules may be applicable to those situations but they should not be blanket applied to all STRA properties, especially those where the host also lives at the property.

**I agree to the above statement**

Yes



**From:** Kelvin Xu <kelvinxu122prymont@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:20 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because this is the only income for me now. I have 2 babies need to take care myself so I can not have a full day work.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

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Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
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#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Kelvin Xu  
2-26 Wattle Cres  
Pyrmont, Nsw 2009

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Thursday, 12 September 2019 10:57 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Tessa Submissions, council submission, non Air BNB run

Submitted on Thu, 12/09/2019 - 10:56

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

**First name**

Edward

**Last name**

Paterson

**Name withheld**

No

## Info

**Email**

[edwardp@kiama.nsw.gov.au](mailto:edwardp@kiama.nsw.gov.au)

**Suburb/Town & Postcode**

Kiama

**Submission**

Council is generally supportive of the proposed reforms to short-term rental accommodation (STRA) regulation as very little is changing regarding the permissibility of STRAs in the Kiama Municipality.

Council welcomes the transfer of the role of compliance to the Department of Fair Trading.

Council understands the supportive role the accommodation sector plays in growing our economy but are also aware of the community's concerns regarding the negative impacts associated with STRAs.

Council also notes that the previously proposed amendment to the Strata Schemes Management Act 2015, requiring the owners corporation of Strata complexes to vote on individual units being used for STRAs, has not been included in this round of exhibited amendments.

Council are interested in reducing the number of days a non-hosted STRA can be occupied for in the Municipality, in a similar fashion to the Greater Sydney Region, the Ballina area and the City of Lake Macquarie area. Council would welcome the opportunity to be involved in further discussions regarding this matter.

Yours faithfully

Ed Paterson  
Acting Manager Strategic Planning

**I agree to the above statement**

Yes

**From:** Kim Cannan <kim@kimcannan.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it enables me to pay off my mortgage while sharing my home. My Guests always explore the Local areas so it's a win/win for individuals and the local business communities.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

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Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

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#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Kim Cannan  
14 Keats Ave  
Bateau Bay, Nsw 2261

**From:** Kim Jones <kimjones1977@outlook.com>  
**Sent:** Wednesday, 11 September 2019 2:20 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it allows me to earn income to support my family living in a resort town where permanent jobs are scarce. If we could not rent out our property to earn extra income we would be forced to sell it as the cost of the mortgage would be too high for us to sustain any other way.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

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Thank you for reading my submission.

Regards,  
Kim Jones  
54 Jonson St  
Byron Bay, Nsw 2481



**From:** Kim MacDonald <kimmie2518@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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Thank you for reading my submission.

Regards,  
Kim MacDonald  
2518 Bulga Rd  
Bobin, Nsw 2429

**From:** Kim Mak <kim.featherandnest@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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Thank you for reading my submission.

Regards,  
Kim Mak  
40 Springvale Lane bega  
Bega, Nsw 2550

**From:** kim martin <kimbo1martino@outlook.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

eSign Authentication			
ASP ID	VTL001	Transaction ID	vsnra:esign:0457:11032021055842000749
ASP Name	For RA Portal DSC Esign	Current Time	11-03-2021 17:58:46

Document Details :

ID	Document Information	Document Hash	Document URL
1	eKYC User Agreement for eSign	96713e33548eb143fc07b6ce30c4887263a7d83d1603cad4869345e41f5533cb	<input checked="" type="checkbox"/> <a href="#">View</a>
2	DSC Application(pdf) for eSign	2c0d87b3e111a83e104c3f07ea1c1b52327e094b5248dd453cab2b7d2929c660	<input checked="" type="checkbox"/> <a href="#">View</a>

Signer ID\*

Enter OTP\*  [Resend OTP](#) Enter PIN\*

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- I understand that the personal data provided by me will be stored by VERASYS TECHNOLOGIES PVT. LTD. till such time as mentioned in guidelines of CCA and the IT Act.

This electronic document is being eSigned as per the second schedule of the IT Act 2008 and eSign guidelines of the CCA, Govt. Of India.

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Dear Director, Housing and Infrastructure Policy,

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I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

#### Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

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I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
kim martin  
18 Selwyn St  
Barry, Nsw 2799

**From:** Kim Tan <tan.ksuan@gmail.com>  
**Sent:** Saturday, 17 August 2019 2:46 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** short term rentals

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category, sent

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens on our operations.

As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

As holiday rentals like mine become more important to the tourism economy, it's my strong belief the NSW Government should build a regulatory solution that ensures the sector can reach its economic potential.

Thank you reading my submission.

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 11:13 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** recorded in DPIE subs register

Submitted on Wed, 11/09/2019 - 11:13

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Kim

**Last name**

Wildey

**Name withheld**

No

## Info

**Email**

[kimwildey@gmail.com](mailto:kimwildey@gmail.com)

**Suburb/Town & Postcode**

Killara 2071

**Submission**

For private investors who rent out a property, these measures will create significant expense.



What plans are there to mitigate this? in particular I'd expect that new regulations would be phased in, say, over 5 years.

For a layperson, these documents are difficult to navigate and understand - a summary of "How this affects you" would be helpful and an extension of the review period.

KEY POINTS: phased introduction of measure, longer review period.

**I agree to the above statement**

Yes

**From:** Kimberley Hammerton <kimhammerton@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:13 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

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## Code of Conduct

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Kimberley Hammerton  
MacLeay St  
Sydney, Nsw 2011

**From:** KIRSTEN ACKLAND <kirstenackland@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:16 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

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Thank you for reading my submission.

Regards,  
KIRSTEN ACKLAND  
541 Federal Dr  
Federal, Nsw 2480

**From:** Wicket Hill <wickethillhouse@gmail.com>  
**Sent:** Thursday, 5 September 2019 9:06 AM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

**Categories:** Purple category

Dear Minister, Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry. As a result, regulation for our sector should avoid unnecessary burdens on our operations. As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

Kind regards,  
Kirsten

**From:** Kochaphan Kersai <dini\_kersai@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:20 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

#### STRA State Environmental Planning Policy

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#### Environmental Planning and Assessment (STRA) Regulation 2019

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Kochaphan Kersai  
80-84 Parramatta Rd  
Stanmore, Nsw 2048



**From:** Kristen Roehrig <auroracottage@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because we love to share our little Cottage with visitors from around the world.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

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Thank you for reading my submission.

Regards,  
Kristen Roehrig  
65 Narrow Neck Rd  
Katoomba, Nsw 2780

**From:** Kristen Toohey <kristen.toohey@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:20 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it provides extra income to help my family with living costs. This is a brilliant way to pump money into local economies. It helps mums and dads like me.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

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Thank you for reading my submission.

Regards,  
Kristen Toohey  
7 Parkwood Grove  
Thirroul, Nsw 2515

**From:** Kristin Badger <kristinrb.266@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:22 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because hosting help me pay for the mortgage associated with the high cost of property in Sydney. I am also the founder of a new business so hosting supplements my cost of living while I grow this business which will contributes to the NSW economy.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

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Thank you for reading my submission.

Regards,  
Kristin Badger  
736 Elizabeth St  
Waterloo, Nsw 2017

**From:** Kristine Ivanisevic <kris.i@live.com.au>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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I host on Airbnb because...

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Thank you for reading my submission.

Regards,  
Kristine Ivanisevic  
33 Lyons Rd  
Sussex Inlet, Nsw 2540



**From:** Kristine McCarroll <kikimccarroll2001@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:22 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host, I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because I am away from my home for part of the year and this allows me to maximise my rental income which is my SOLE income.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home-sharing economy to thrive. In Tasmania, there is a simple, quick and cost-effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data-sharing framework.

#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home-sharing community and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home-sharing, the message of hosts across NSW remains the same - we want to work with you and have a say in developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home-sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Kristine McCarroll  
142 Addison Rd  
Marrickville, Nsw 2204

**From:** Kylie Hawker <kyliehawker@live.com>  
**Sent:** Wednesday, 11 September 2019 2:13 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

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Thank you for reading my submission.

Regards,  
Kylie Hawker  
40 Corunna Rd  
Narooma, Nsw 2546

**From:** Kylie Maley <beachbreakboomerang@bigpond.com>  
**Sent:** Wednesday, 11 September 2019 2:22 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Rob submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

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Thank you for reading my submission.

Regards,  
Kylie Maley  
18 Ocean St  
Dudley, Nsw 2290

**From:** L Annesley <jeffleeannesley@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:23 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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Thank you for reading my submission.

Regards,  
L Annesley  
87 Marine Parade  
Avalon Beach, Nsw 2107





## LakeGroupStrata

STRATA | COMMUNITY TITLE | MANAGERS

13 September 2019

Att: Director, Housing and Infrastructure Policy  
NSW Department of Planning, Industry and Environment  
GPO BOX 39  
Sydney NSW 2000

Dear Sir/Madam

We appreciate the opportunity to provide feedback to the NSW Governments Short Term Rental Accommodation policy. As a prominent Strata Management Company in the Newcastle region, we are acutely aware of the impact that the short term letting industry can have on the amenity of a building if the necessary regulation framework is not in place or adequately administered by the appointed regulatory body.

### **Background**

Our company has been involved in the Strata industry since 1993 and we have seen a steady increase in the use of Strata Lots for short term rental accommodation. In general terms, we see that there is a market for short term lettings, however the impact on the amenity of the building and in turn the effect on our management of the property, is often dependent on whether the property as a whole was originally developed for the purpose of short term lettings.

It is our experience that properties that are wholly used for short term letting accommodation generally run smoothly, as Lot Owners generally have similar values and are often focused primarily on maximising a return on their investment. Any impact on the amenity of residents is often fleeting, as all Lots regularly change occupants and thus there is no build-up of frustration that can often occur in a building containing primarily owner occupied or long term tenanted Lots. Properties designed for short term lettings would commonly employ an on-site manager or Caretaker that is able to induct residents into the property, explain expectations and address any issues in a hands on manner.

Our office manages a sizeable portfolio of holiday lettings in the Hawks Nest and Tea Gardens area and many of these consist wholly of serviced apartments/short term lettings and are generally seasonally occupied. In these locations, short term lettings function well as there are real estate agents managing the tenancies and can assist when conflict or occupancy issues arise.

Conflict can, and quite often does, occur in buildings containing Lots that are primarily owner occupied and long term tenanted. Residents of these buildings value the peaceful enjoyment of their Lots and are often at odds with the values of the occupation of the Lots used for short term accommodation, when considering that those seeking to occupy Lots on a short term basis quite often are seeking an alternative to the typical hotel/motel type accommodation, perhaps hoping there will be more of a relaxed approach towards noise restrictions and generally a less structured approach towards the management of the letting. Quite often owners in a one off short term letting Lot will have little or no personal contact with the guest and as a result do not give an explanation as to what is expected of the guest

East Maitland - 9/128 Lawes Street ■ PO Box 1 ■ East Maitland 2323 ■ Phone: 02 4933 6466 ■ Facsimile 02 4933 6733  
Charlestown - 34 Smith Street ■ PO Box 175 ■ Charlestown 2290 ■ Phone: 02 4942 3305 ■ Facsimile 02 4942 3243



in terms of behaviour or any sanctions that may apply to dissuade the guest from disturbing the amenity of the building.

From a Strata Management point of view, we categorise the types of issues we experience as follows:-

1. Noise Complaints – By far the most common issue, noise complaints are generally a combination of one or more of loud music, loud voices and slamming of doors, quite often into the early hours of the morning.
2. Occupant Behaviour – This can be an issue for those Lots being used for parties or guests returning from functions such as weddings or birthday parties. Residents have reported damage to common areas, soiling of common areas by drunken guests, aggressive and antisocial behaviour towards other guests and residents. Residents who experience this report a build-up of frustration as they can experience the same issues across multiple tenancies (often weekends) with no real ability to sanction the host or the landlord.
3. Occupation of Lots – Concerns can be raised regarding the number of people that may occupy a serviced apartment or short term letting. Often numbers can exceed 2 adults per bedroom, with the occupants seeking to spread the cost of renting the Lot across a larger number of people to make the occupation more cost effective. This in turn creates additional noise, influences hot water supply to the building and could be considered a safety risk if large numbers of Lots were to be over occupied.
4. Security – This can be a major issue for buildings, particularly if combined with large numbers of people occupying a Lot. Residents in the past have reported fire doors being chocked open to allow guests to gain access if there are not enough keys or swipe tags between guests. This could also be considered a breach of fire safety regulations.

Additionally, some short term letting operators have been found to store keys in the letterbox for the Apartment and this can be a target for thieves to steal the keys and gain access to the building. Alternatively, lockboxes can be used and if the codes are not changed regularly, access can often be gained by previous occupants and this can lead to both access to the apartment and common areas such as garage areas where storage cages can be broken into and bikes stolen.

#### **Comments regarding proposed regulatory framework**

As a whole, we feel positive regarding the proposed framework, however the success or failure of the system we feel will largely sit on the shoulders of those responsible for arbitrating the system. Whilst we acknowledge that there is proposed to be an exclusion system, our initial concerns are whether the arbitrators will take a black and white approach towards the system without a bias towards the individual short term letting operator. It is our view that regulators need to be strongly considering the opinions of the majority, rather than focusing on the impact on the minority who may choose to use their Lot as a short term letting. We would also suggest giving particular weight to the use contained in the original Development Consent for the property.

We provide comment with reference to how the proposed introduction of the regulatory framework is likely to affect our business operation (particularly with respect to our clients). Our position is one of balance. We can see that in the right setting, there is a benefit to allowing short term lettings, however we would like to see that for Strata and Community Title



property, the decision rest with the Owners Corporation via Special Resolution, rather than have the majority being dictated to by one or two Owners or Occupiers that may choose not to comply, which is currently the case. Our views with respect to the draft documents are as follows:-

### **Code of Conduct**

Whilst we understand the intention of the Code of Conduct, from a Strata Management perspective, we feel that there are significant loop holes that will either be exploited by hosts or be too difficult to police to the point where the Owners Corporation may take the position of registering a By-Law to prohibit short term lettings rather than consider managing short term lettings. From a Management perspective, we do not see any benefit to sanctioning Guests. In a short term letting scenario, it is our experience that the event will have occurred and the Guest having moved on by the time the Owners Corporation or Strata Committee are in a position to identify and sanction the Guest.

It is our strong recommendation that the Guest should be considered an invitee of the Host and as a result, any breach by the Guest, if approved by the Commissioner, should be a strike against the Host.

Our comments regarding individual clauses are as follows:-

Clause 5.2 – The Host should be obligated to advise the booking platform when a By-Law has been registered prohibiting short term lettings. It is important that the booking platform couldn't say they weren't informed, so the fact that the Host failed to notify the booking platform would in itself be a serious breach worthy of a strike.

Clause 5.2.3 – There should be an obligation in a Strata or Community Plan for the booking platform or the Host to notify the Strata/Community Managing Agent of any complaint made.

Clause 5.3 - The Host should be obligated to advise the letting agent when a By-Law has been registered prohibiting short term lettings. It is important that the letting agent couldn't say they weren't informed, so the fact that the Host failed to notify the letting agent would in itself be a serious breach worthy of a strike.

Clause 5.3.3 – There should be an obligation in a Strata or Community Plan for the letting agent of the Host to notify the Strata/Community Managing Agent of any complaint made.

Clause 5.4.6 – Clause a) should be re-worded to state the host AND the hosts authorised representative. Contact details should also be defined as land line contact number, mobile number and email address – we are occasionally contacted on our afterhours number by short term Guests who have been locked out or lost their keys and they do not have the Host's contact details. Our office would charge a fee for this service and the fee should be payable by the Host (not the Owners Corporation/Association)

Clause 5.4.8 – this should be prefaced by stating that 'BEFORE commencement of the short term letting use, a Host must give.....'. Clause b) should also state details of the Host AND an authorised representative (mobile number, landline, email).

Clause 5.4.9 – we can see this clause being exploited with Host name changes and similar evasive tactics. The prohibition should be on the Lot not the Host. It would be far more effective to have that Lot exiled from short term lettings for 2 years than to have a Host excluded, only to be replaced by a related party.

Clause 5.4.12 – add a clause to state that a breach by the Guest (or their visitors) is to be a strike against both the Guest and the Host. It is our strong view that it is only a clause of this



nature that will ensure the Host will make all reasonable endeavours to ensure that their invitees are model Guests and they should be doing the necessary background checks before occupancy is granted. At present, there does not appear to be any kind of background checking before an application for tenancy is accepted.

Clause 5.5.2 – additional subclauses should be added for:-

- Not compromising the security of the building by chocking doors open, copying keys, distributing swipe tags/remotes and other similar activities.
- Not compromising the fire safety of the building

Clause 5.5 – include 'and the common property' if in a Strata Scheme or Association Property in a Community Scheme.

Clause 6.1.6 – Agreed however the Commissioner should have the power to award costs against a Host or Guest if a strike is issued following the complaint.

Clause 6.2 (inclusive of 6.2.1 – 6.2.5) – these sections should be removed in full. This is a significant fault in the Code of Conduct and will serve only to complicate and add further layers of bureaucracy to the process. The Commissioner could certainly use their reasonable endeavours to gain advice from the Police or Local Council before making the decision, however referring the matter to the Council to address planning laws is flawed, as Councils have generally been seen wanting to distance themselves from short term letting compliance.

If these Clauses remain, it would be our general recommendation to our Owners Corporations and Association clients that if they have reservations regarding short term lettings, they would be advised to register a prohibition By-Law than to try and manage the process. The key reason would be that it would not be cost effective to battle Hosts or Guests who choose to breach By-Laws as they'll likely be pushed by the Commissioner to the NSW Civil & Administrative Tribunal to have the matter heard before a strike is issued. It would be simpler to prohibit short term lettings. You could imagine that if the Host has spent significant funds upgrading the fire safety compliance of the Lot and the Owners Corporation then register a By-Law prohibiting short term lettings, this would create dispute.

Clause 7.1.1 – a clause should be added requiring the Host to advise the Strata/Community Managing Agent (where applicable) when a strike has been issued.

### **Fire Safety Standard**

We would be generally supportive of the conditions placed on the owners of Lots in a Class 1 and 2 buildings that are considering operating the Lot as a short term letting. Imposing additional fire safety requirements may mean a more considered approach will be taken by the Lot Owner to ensure the change of use will be worthwhile in comparison to the upfront capital investment to upgrade the fire safety measures within the Lot.

We would recommend that:-

1. The owner of the Lot(s) conducting short term lettings be responsible for any costs associated with the need to update the Essential Services Schedule for the building.
2. That in the case where the property may not have previously been subject to an Annual Fire Safety Statement prior to the use as a short term letting, the owner of the premises should meet all costs related to maintenance and upgrades related to the submission of the fire safety statement for the initial calendar year following notification that a Lot is being used as a short term letting.

**State Environmental Planning Policy (Short Term Rental Accommodation) 2019**

We have read and understood the proposed amendments and are of the opinion that this legislation should be commented on by appropriately qualified planning consultants.

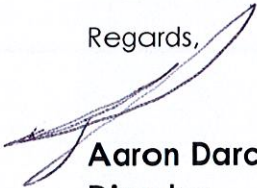
**Environmental Planning and Assessment Amendment (Short Term Rental Accommodation) Regulation 2019**

We have read and understood the proposed amendments and have no comment to make other than the hope that the penalties issued are of a value to satisfactorily deter industry participants from making future breaches of the Code of Conduct.

Lastly, we appreciate the opportunity to be able to provide feedback and we trust that prompt steps will be taken to review the responses and swift action taken to implement the final versions of the draft legislation.

Please contact the writer on (02) 4942 3305 or [aaron@lakegroupstrata.com](mailto:aaron@lakegroupstrata.com) should you require any clarification on the above.

Regards,

A handwritten signature in blue ink, appearing to read 'Aaron Darcy', with a long, sweeping underline.

**Aaron Darcy  
Director  
Lake Group Strata**

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Friday, 13 September 2019 8:58 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Tessa Submissions, non Air BNB run

Submitted on Fri, 13/09/2019 - 08:55

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

**First name**

Aaron

**Last name**

Darcy

**Name withheld**

Yes

## Info

**Email**

[aaron@lakegroupstrata.com](mailto:aaron@lakegroupstrata.com)

**Suburb/Town & Postcode**

Charlestown 2290

**Submission file**

[short-term-letting-submission.pdf](#)

**Submission**

Please see submission attached.

**I agree to the above statement**

Yes





11 September 2019

Att: Director, Housing and Infrastructure Policy  
NSW Department of Planning, Industry and Environment  
GPO BOX 39  
Sydney NSW 2000

Dear Sir/Madam,

**Subject: Short-term Rental Accommodation Reforms**

Thank you for the opportunity to provide comment on the short-term rental accommodation reforms. This submission is provided by Council staff.

Lake Macquarie City Council welcomes the release of the discussion paper, the draft Code of Conduct and the proposed planning amendments. These documents assist to provide clarity on how the proposed planning legislation for short-term rental accommodation (STRA) may be enacted and affect Council and STRA hosts. STRA is a concern that faces not only Lake Macquarie Council and its constituents, but also many other Council areas across NSW.

As per our submission to the Options Paper released in 2017, and to the EIE released in 2018 Council staff's view is that STRA is currently regulated inconsistently through the planning system and there is value in having a more standard approach. Council staff generally supports the findings and recommendations of the Parliamentary Inquiry released in October 2016. Similarly, we agree with the NSW Government, that STRA provides significant economic benefit to the NSW and Lake Macquarie economy. It also has the potential to generate substantial detrimental impacts on the community if not regulated with clarity.

**Background**

Council has been working with the Department of Planning, Industry and Environment (formerly the Department of Planning and Environment) for some time regarding the regulation and certainty around the permissibility of STRA. This included the drafting of an amendment to the Lake Macquarie Local Environmental Plan 2014 (LMLEP 2014) to regulate this land use.

Some of the approaches included in the amendment, were:

- To require development consent for dwellings with five or more bedrooms, intended for short-term holiday letting use;
- That written documentation be provided to guests outlining terms and conditions of

Our Ref: F2014/01451/03 Your Ref:

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Speers Point NSW 2284  
Box 1906 HRMC NSW 2310  
T 02 4921 0333  
E [council@lakemac.nsw.gov.au](mailto:council@lakemac.nsw.gov.au)  
W [lakemac.com.au](http://lakemac.com.au)





letting the property, including maximum number of guests, correct waste disposal and identification of vehicle parking areas; and

- Signage clearly displaying the contact details of the owner or property manager, should disturbances to the amenity of the neighbourhood occur.

The LEP amendment has been placed on hold pending further progress of the options paper, community feedback, and the Government's regulatory response.

Council made a submission to the Parliamentary Inquiry into the adequacy of short-term holiday letting in NSW by the NSW legislative Assembly Committee on Environment and Planning in 2016. Our submission advocated for a state-wide definition as well as policy and planning guidance for managing short-term accommodation in NSW.

Council also made a submission to the short-term holiday letting Options Paper in October 2017. Our submission advocated for the use of the term 'short-term rental accommodation' instead of the term 'short-term holiday letting', the requirement for a registration or licensing system, creation of a fact sheet, maximum exempt use at 90 days and the requirement of signage for dispute management at property entries.

In November 2018, Council provided a submission to the short-term rental accommodation EIE. This submission advocated for reconsideration of how bushfire prone properties should be treated, further consideration of how the timeframe restrictions should work and that it should not be a blanket rule, and thoughts on the proposed Code of Conduct.

## **Comments on the Proposed Changes**

### **Draft State Environmental Planning Policy (Short-term Rental Accommodation) 2019**

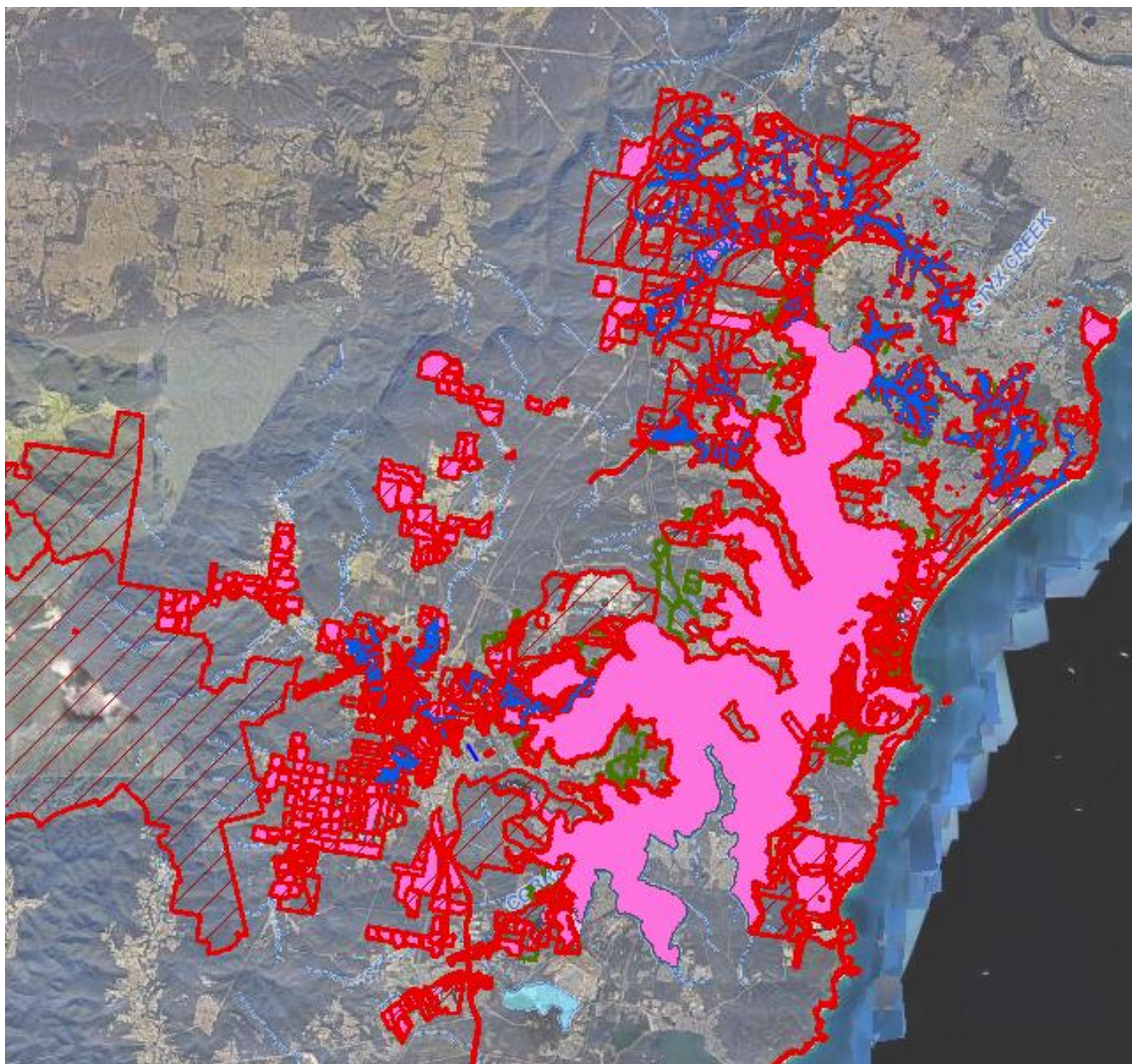
STRA is proposed to be permissible as either exempt development or complying development, depending on whether a host is present on the site and the bushfire rating of the dwelling. This use is proposed to be permissible for all approved dwellings, excluding boarding houses, seniors housing and group homes. This does not include manufactured housing which is often developed as over 55s living estates, nor does it consider heritage buildings or precincts.

The proposed controls for STRA accommodation, limits the number of bedrooms to 6 and a maximum number of guests to 12.

In the proposed draft SEPP there is no direct link to the fire safety requirements, nor the Code of Conduct. This may be poorly understood by hosts, guests and other parties involved in the STRA industry.

For Lake Macquarie City Council, there is concern as to how the 180-day restricted use will be monitored. At this time, staff do not have the information available to monitor these uses and how long each rental is being utilised for. This is made more difficult with the inclusion of 21 day or longer rentals not being included under the 180 day restriction.





*Figure 2 Lake Macquarie Flood Zone Areas*

### *Recommendation*

STRA proposed for dwellings; produced under the SEPP No 36 – Manufactured housing, or dwellings that are heritage listed or within a heritage conservation area, should be considered as complying development.

Ensure owners wishing to lease their property as STRA can lodge a development application to Councils who restrict operations to less than 365 days, or who wish to lease more than 6 bedrooms or to more than 12 guests. This can be done by adding short term rental accommodation as a use in the Standard Instrument – Local Environmental Plan.

A direct link through a clause, and not a note, should be included in the SEPP to alert people to their obligations under both the fire safety requirements and the Code of Conduct.

It is recommended that the Department of Planning, Industry and Environment, and/or the Minister of Fair Trading provide information as to how they and Council staff can access information on the number of nights that a STRA premises is leased.

For flood prone areas, with a management plan, these premises can be considered as exempt development, as long as an evacuation plan is prepared and provided to guests.

### **Draft Code of Conduct for the Short-term Rental Accommodation Industry**

Lake Macquarie City Council support the development of the draft Code of Conduct. This document seeks to address the potential amenity issues that may arise from people letting out their dwellings. Council also supports the inclusion of an exclusion register, record keeping requirements, and the requirement to notify neighbours. We believe that this could be extended by having a register for all properties and hosts that is publicly accessible, not just limited to those who have been excluded.

Council are concerned that the proposed exclusion register being industry led may lead to unsavoury outcomes.

Having the Code of Conduct supported by the Act and Regulations is likewise something Council supports, due to the financial penalties that this attaches to breaches of the Code. This provides additional weight and incentive for participants to comply.

In regards to the complaints procedure, Council is supportive of the requirements for providing evidence, but has some concern in regards to the investigations, particularly in the case of contravention of planning laws. As almost any breach, be it noise, waste, or use of the building could be considered a contravention of planning laws. Council is concerned that potentially all complaints may be passed over to Council. This could potentially place a great strain on Council officers.

#### *Recommendation*

Council would support a mandatory host register, that lists the location, number of bedrooms and emergency contact information. This should be publicly available, and potentially incorporate an automatic notification system, similar to a development assessment notification. Having this register with an automatic notification system could remove the requirement for hosts to notify the neighbouring properties and reduce burden on the hosts.

The exclusion register and the proposed host register should be controlled and maintained by the Minister for Fair Trading, and could be managed and maintained through small fees to join the register. Thought should also be given as to how to verify the information that is provided by hosts to a potential host register.

Council also recommend that the Commissioner accepts complaints about short-term rental accommodation activities, unless there is evidence to show that there is a breach of planning laws in relation to the construction of the dwelling, or the letting of a building that does not have approval as a dwelling, eg. A warehouse being used as a dwelling for STRA purposes. Prior to the adoption of the Code of Conduct and the legislative changes, clarity needs to be provided to Councils and industry as to who the point of



contact should be for each nature of complaint. It would be Council's preference that all complaints are accepted by the Commissioner where evidence has been provided and then work concurrently with Councils or other agencies to investigate and determine the complaint.

If Council is nominated to be investigate and determining the complaints, then it is requested that there is a mechanism provided for Councils to recover the costs of this work. Framework should also be provided to guide Council staff as to the basis under which they can also decline to accept a complaint, in the same nature that the Commissioner may also decide to decline a complaint.

#### **Draft Fair Trading Amendment (Code of Conduct for Short-term Rental Accommodation) Regulation 2019**

Lake Macquarie City Council are supportive of the proposed changes to the Fair Trading Amendment (Code of Conduct for Short-term Rental Accommodation) Regulation 2019. Council see this as providing the necessary weight to the Code of Conduct, by including financial penalties for any breaches of the Code of Conduct.

#### **Environmental Planning and Assessment Amendment (Short-term Rental Accommodation) Regulation 2019**

Lake Macquarie City Council are supportive of the proposed changes to the Environmental Planning and Assessment Regulation 2019. These changes support the additional fire safety requirements for STRA and the proposed Short-term Rental Accommodation Fire Safety Standard. Council would welcome a clear link through a clause in the SEPP to this regulation and to the Short-term Rental Accommodation Fire Safety Standard to strengthen the relationship and provide clarity to hosts as to what their requirements are.

#### **Short-term Rental Accommodation Fire Safety Standard**

Lake Macquarie City Council support the introduction of the Short-term Rental Accommodation Fire Safety Standard. This document provides the guidelines around the fire safety requirements for dwellings that facilitate STRA. These guidelines include the type and location of smoke alarms and emergency lighting. These standards vary depending on the class of building. This may be difficult for those outside of the development industry to comprehend.

The requirements listed are much greater than the average dwelling includes. As this is additional work for hosts to implement, and many STRA may be exempt development, there is concern as to how this will be monitored.

As STRA dwellings are now being used for commercial purposes, it is unclear as to whether these dwellings require annual fire safety inspections and certificates.

It's also noted that there is not a requirement for an evacuation plan or fire extinguishers in Class 1a buildings.

#### *Recommendation*

Council recommends that a plain English guide to STRA, particularly aimed at hosts and their obligations be created. This guide should be written in a simple way, with

potential flow charts to help owners determine where their property sits within the proposed framework and what things they need to consider. This guide will assist with compliance and reduce the potential number of issues due to hosts not understanding their obligations.

STRA should require an annual fire safety inspection to ensure that these fire safety measures are being implemented and maintained. If there is no inspection requirement, it is not considered likely that hosts will implement these measures. Clarification around the requirements for Fire Safety Certificates would also be welcomed.

It is also recommended that an evacuation plan and fire extinguisher be required in each dwelling where the dwelling is not hosted.

### **General Comments**

As many STRA properties also include the use of swimming pool and spa facilities, it is of Council's opinion that these should be registered and inspected annually. Due to the change of use from a dwelling to STRA, Council would like clarification as to whether this triggers any requirements under the Swimming Pools Safety Act for annual inspections, as opposed to the requirements for residential dwellings.

Lake Macquarie City Council support the work that has gone into creating this proposed framework and recognises that this has gone some way to addressing concerns we have raised in previous submissions.

Should you require further information, please contact Samantha Hardie on 4921 0492 or via email [shardie@lakemac.msw.gov.au](mailto:shardie@lakemac.msw.gov.au).

Yours faithfully,

Justin Day  
**Head of Development and Planning**

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 1:14 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** recorded in DPIE subs register

Submitted on Wed, 11/09/2019 - 13:11

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

**First name**

Samantha

**Last name**

Hardie

**Name withheld**

No

## Info

**Email**

[shardie@lakemac.nsw.gov.au](mailto:shardie@lakemac.nsw.gov.au)

**Suburb/Town & Postcode**

2284

**Submission file**

[council-submission-on-short-term-rental-accommodation-reforms.pdf](#)

**Submission**

Dear Sir/Madam,

Thank you for the opportunity to provide a submission on the proposed reforms to allow Short-term rental accommodation.

Please see attached for Lake Macquarie City Council staff's submission.

Kind Regards,  
Samantha Hardie

**I agree to the above statement**

Yes



**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 5:04 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Rob submission 3.0, non Air BNB run

Submitted on Wed, 11/09/2019 - 17:04

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

**First name**

Laura

**Last name**

Crommelin

**Name withheld**

No

## Info

**Email**

[laura.crommelin@unsw.edu.au](mailto:laura.crommelin@unsw.edu.au)

**Suburb/Town & Postcode**

UNSW Sydney 2052

**Submission**

Please see attached file.

**I agree to the above statement**

Yes

**From:** Laura Davies <laura@thescoutgroup.com.au>  
**Sent:** Tuesday, 10 September 2019 3:45 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** recorded in DPIE subs register, recorded and not sent to DCS, Purple category

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it enables me as a professional management business owner to offer alternate accommodation to holiday makers, corporate travellers, locals that may need temporary accommodation due to insurance claims / or renovating their properties at an affordable price.

I have a business that represents home-owners who wish to host on Airbnb. Airbnb helps these home-owners to pay the mortgage and the bills, and to share their spaces to guests so that they can become part of other communities.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share the homes of our home-owners.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

#### STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

#### Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Laura Davies  
18 Binda Cres  
Little Bay, Nsw 2036

**From:** laura pike <laura\_pike@hotmail.com>  
**Sent:** Thursday, 5 September 2019 8:35 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

Dear Minister, Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry. As a result, regulation for our sector should avoid unnecessary burdens on our operations. As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

**From:** laura van wieringen <diamondsr4ever000@gmail.com>  
**Sent:** Thursday, 5 September 2019 9:17 AM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

Dear Minister, Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry. As a result, regulation for our sector should avoid unnecessary burdens on our operations. As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

Sent from my iPhone

**From:** Laura Van Wieringen <diamondsr4ever000@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

#### STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

#### Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
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#### STRA Property Register

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Laura Van Wieringen  
492 Coolamon Scenic Dr  
Coorabell, Nsw 2479



**From:** Laura Williams <laurakatewilliams@outlook.com>  
**Sent:** Wednesday, 11 September 2019 2:21 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host a council approved self contained dwelling on my property through Airbnb. I started hosting this space (which was originally built for in-laws and family/ friends) 2 years ago when I had an infant and was pregnant with my 2nd child. I was working part-time but living outside of Dorrigo with no family in the area I had little child care options for an infant under 2.

Being on Airbnb allowed me to still earn income without having to leave my property and pursue childcare etc. 2 years on it is still a main financial contributor to my income for which I am eternally grateful!! All the income I receive through this is declared.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that

hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
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#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Laura Williams  
77 Moonpar Rd  
Bostobrick, Nsw 2453

**From:** Lauraine Fullbrook <raine.can@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

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Environmental Planning and Assessment (STRA) Regulation 2019

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Thank you for reading my submission.

Regards,  
Lauraine Fullbrook  
28 Aldinga Dr  
Wamberal, Nsw 2260

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Thursday, 5 September 2019 6:27 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category

Submitted on Thu, 05/09/2019 - 18:27

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Laurence

**Last name**

Mather

**Name withheld**

No

## Info

**Email**

[lemather@optusnet.com.au](mailto:lemather@optusnet.com.au)

**Suburb/Town & Postcode**

Milsons Point, 2061

**Submission**

I respond to the call for feedback in association with the Draft of the Code of Conduct for the Short-term Rental Accommodation Industry. I do so as an owner-occupier in a multi-story apartment building within the North Sydney LGA, an area in which internet advertisements for such short-term rentals are readily found.

The Draft Code of Conduct sets out the rights and obligations of such short-term rental accommodation industry participants, along with methodology and rules to administer and regulate the various components, including obligations and behaviour of the participants, as well as the outcomes of such transactions. Questions have been proposed in order to address a wide range of issues pertinent to a range of scenarios. This submission is concerned only with that of multi-unit apartment buildings and the fundamental propositions associated with short-term rentals therein. It is agreed that proper and correct fire safety issues should be beyond question for any such building and all unit owners. However, the fundamental issues of concern for owner-occupiers in apartment buildings are, not unexpectedly, those potentially directly attributable to “short-term renters” in a residential building.

**Amenity and Security.** As an owner-occupier, I have concerns for preclusion or reduction of “homeliness” of our home in our building, along with concerns that short-term non-resident apartment users may not understand or appreciate residents’ issues;

**Compliance with by-laws and/or fire regulations.** “Short-term renters” would likely not know the by-laws of the building and thus may violate the by-laws out of ignorance or may choose not to respect the by-laws – this could lead to loss of amenity and/or security of other residents, and potentially cause expense and inconvenience to all owners;

**Damage to common property.** I have concern that short-term non-resident apartment users may cause damage to common property either out of accident or carelessness or even malice, thereby incurring expense and inconvenience to all owners;

**Insurance.** I have concern that short-term non-resident apartment users’ actions may cause ‘knock-on’ expensive effects to all owners.

It is submitted that commercial premises organized for “short-term renters” account for these concerns in appropriate ways.

It is my view, and one expressed informally by many owner-occupiers of multi-unit residential buildings, that the members of the respective Owners’ Corporation should, at an appropriate General Meeting, determine the plan of action best suited to themselves, analogous to the passage of, or modification to, by-laws. I believe that imposition of rules or other conditions of short-term rental accommodation by government, even including the duration of use of a “short-term rental agreement”, on an Owner’s Corporation is entirely inappropriate but should be the responsibility of that Owners’ Corporation.

**I agree to the above statement**

Yes

**From:** Lauren Elyan <lauren\_e123@yahoo.com.au>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it provides me a stable income. This revenue enables me to stay at home with my toddler.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

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Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired

- Require evacuation or emergency plans and guest education

#### STRA Property Register

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#### Code of Conduct

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Lauren Elyan  
Vaucluse  
Vaucluse, Nsw 2030



**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Sunday, 8 September 2019 6:27 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** recorded in DPIE subs register, Purple category

Submitted on Sun, 08/09/2019 - 18:26

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Lauren

**Last name**

Kitchell

**Name withheld**

No

## Info

**Email**

[lauren\\_maree\\_taylor@yahoo.com.au](mailto:lauren_maree_taylor@yahoo.com.au)

**Suburb/Town & Postcode**

Casuarina

**Submission**

I think we should encourage STHL in Kingscliff and Casuarina area being a area that is developing the extra income coming into the area is helping local business an creating more jobs this town is growing rapidly and would be a shame to stop STHL .

**I agree to the above statement**

Yes

**From:** Lauren O'Neill <laurenoneill86@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it allows families to have much needed affordable holidays together. Motels in my area charge up to \$600 per night over summer. We need tourists in our area to survive!

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

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I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

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- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired

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#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

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Thank you for reading my submission.

Regards,  
Lauren O'Neill  
1-7 Ocean View Ave  
Merimbula, Nsw 2548

**From:** Lauri Kilfoyle <blueberryandalmond@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because I have an intellectually disabled sister that lives interstate and I need to travel there frequently to support her. When I do this I am unable to earn an income and therefore, I rent my home out to guests while I am away to financially support me whilst I fulfil my carer responsibilities.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

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Thank you for reading my submission.

Regards,  
Lauri Kilfoyle  
19 Wellington St  
Bondi, Nsw 2026

**From:** Lawrence Brookes <info@jervis.com.au>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

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Thank you for reading my submission.

Regards,  
Lawrence Brookes  
35 Walsh Cres  
North Nowra, Nsw 2541



**From:** Laybutt Stanley <laybuttd@yahoo.com>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it provides an essential component to my family's income and ability to provide for my retirement. My Airbnb Property is a key asset in my SMSF and would have to be sold if I am not able to Airbnb under the current system - at a likely loss. My Airbnb also provides a retirement income to me retired neighbours who are caretakers and manage my property, the income they have earned has enabled them to pay off a financially destructive reverse mortgage they had taken against their home and now provides with enough money to afford regular holidays and the retirement lifestyle they have always wanted. Your decision to change rules will destroy their ability to supplement their self funded retirement income.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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Thank you for reading my submission.

Regards,  
Laybutt Stanley  
26 Ocean Dr  
Safety Beach, Nsw 2456

**From:** Leah Cotter <kookaburraretreat@outlook.com>  
**Sent:** Wednesday, 11 September 2019 2:20 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

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Thank you for reading my submission.

Regards,  
Leah Cotter  
78 Lonsdale Ave  
Berowra Heights, Nsw 2082

**From:** Leah Cotter <kookaburraretreat@outlook.com>  
**Sent:** Saturday, 7 September 2019 8:39 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

Dear Minister, Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry. As a result, regulation for our sector should avoid unnecessary burdens on our operations. As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

Regards,  
Leah

**From:** Leah wheeler <duckbathrooms@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:13 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

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Thank you for reading my submission.

Regards,  
Leah wheeler  
Boundary St  
Tweed Heads West, Nsw 2485

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Monday, 9 September 2019 4:22 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Tessa Submissions, recorded in DPIE subs register, Purple category

Submitted on Mon, 09/09/2019 - 16:21

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Leanne

**Last name**

Bell

**Name withheld**

No

## Info

**Email**

[leanne\\_maree58@hotmail.com](mailto:leanne_maree58@hotmail.com)

**Suburb/Town & Postcode**

2487



**Submission**

I feel that the holiday visitors to our area add a huge income to the local businesses  
If the rentals are run properly I fully agree it should stay this way

**I agree to the above statement**

Yes

**From:** Leanne Gallagher <leanneviolet@hotmail.com.au>  
**Sent:** Wednesday, 11 September 2019 2:22 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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Thank you for reading my submission.

Regards,  
Leanne Gallagher  
8 Durham Ct  
Dural, Nsw 2158

My home is an apartment that I own in a multi story building in Milsons Point and I have several areas of serious concern with the short-term letting package proposed by the NSW Government:

### **1. Preservation of Owners' Rights:**

Residential apartment buildings in mixed use and commercial zones with express prohibitions or limitations on short term letting must have their by-laws respected and preserved. There can be no over-riding policy reason which dictates limitations on the right of apartment owners to collectively decide whether or not to permit short-term letting where this is the clear desire of the democratic majority.

### **2. Collective Cost of Permitted Short-term Letting**

Residential schemes must have authority to levy charges and fees on Hosts conducting short-term letting. The disproportionate cost to owners and owners' corporations from STRA operations (e.g. wear and tear of lifts, gyms, garbage and other utility areas as well as administration and management costs) means they are effectively subsidising those running STRA businesses. Security arrangements in individual buildings must not be compromised. The Hosts should also be required to advise the Owners Corporation of intent to let their property on a short-term basis and to pay any extra insurance costs levied on the building.

### **3. Preservation of Local Government Oversight**

Local Councils must have the ability to set and apply zoning restrictions to meet their strategic planning objectives. They should be involved in designing and be part of the compliance and enforcement function of any registration system.

### **4. Fire Safety Standards:**

The only way to ensure that mandatory fire safety standards are met is for STRA in residential strata schemes to be classed as "complying development" (not "exempt development") which allows for inspection by Local Council or a private certifier. In addition:

- (a) Fire safety standards should be more onerous for short-term holiday visitors in high-rise apartment buildings as the threat to life of all residents is increased significantly.
- (b) Fire standards applicable to residential apartment buildings do not address the fire risks of cooking, BBQ's or smoking on balconies which are common problems with short stay visitors unfamiliar with by-laws or local customs.
- (c) Fire safety in residential strata schemes must not be left to self-regulating platforms or amateur hosts as it poses an unacceptable risk to all residents.
- (d) Fire and Rescue NSW should have direct access to Register data such as how many STRA apartments are listed in a single high-rise building to enable accurate assessment in emergency situations.

### **5. Effective Registration:**

An independent, publicly funded registration system is essential to identify STRA properties, the owner/host, their agent or nominated representative as well as having data on address, location, intensity, volume, days of availability, days of occupation, number of rooms, etc. in order to develop

a profile and analysis of the STRA industry. Other major cities such as New York, San Francisco, Barcelona, Paris, Toronto and Vancouver, who have experienced this industry, are now devising or implementing legislation to strictly regulate its operation. At the very least, NSW should have controls in place BEFORE allowing STRAs to operate in apartment buildings as well as enforceable and fast-acting conflict resolution processes.

Given the disparate issues involved with the regulation of AirBnB, Stayz and the like, the Milsons Point Community Group regards as essential the establishment of a Register run by either Government, local Councils or a neutral platform, with powers that are time-sensitive, practically enforceable and of real utility to residential strata schemes. This Register must be necessary pre-requisite to any new regulatory framework. STRA can transform homes into hotel rooms and neighbours should not be obliged to give up their right to quiet enjoyment with bland reassurances about conflict resolution. Such a Register has been found to be helpful in somewhat alleviating these problems in cities overseas.

#### **6. Host's Registration Obligations:**

There must be enforceable obligations for Hosts to register the premises before it is used for STRA purposes. Penalties should apply for unregistered premises. The Host should identify all platforms on which their property is listed, identify days of availability and report nights of occupations. Additionally, there must be a legal obligation for Platforms and agents not to list an unregistered residential dwelling for STRA. Again, there should be no change in planning laws in residential apartment buildings until the Register is in place.

#### **7. By-Law Enforcement:**

In cases where a strata scheme has a by-law prohibiting STRA, it must not be possible for this to be circumvented by any person who is not an actual owner being registered as a host. In the case of residential tenants, there must be evidence that the landlord has expressly permitted the conduct of STRA by the lessee. STRA in strata buildings must require a complying certificate. This should be part of the registration process as it is essential data for regulatory oversight and enforcement.

#### **8. 180 Day Cap:**

The proposed 180 day cap is unacceptable and excessive by world standards. It makes a mockery of the original intention that the caps were to be an economic lever to drive apartments back into the domestic residential market.

The rapid growth in short-term letting in recent years has had significant impact on apartment buildings as well as residents on areas such as amenity, strata costs and individual safety. Such growth has clearly outpaced regulation and owner's corporations should be given greater ability to manage these impacts. Under no circumstances should this industry be self-regulated.

#### **9. Some Questions to be answered:**

Some questions which demand answers in relation to the proposal by the NSW Government are as follows:

Why are the NSW Department of Planning, Industry and Environment and Department of Customer Service dictating by-laws concerning STRA when there is already an extensive Strata Schemes Management Act 2015 covering the management and control of Strata Schemes? Surely this should be the right of individual Owners Corporations to decide if they want to prohibit STRA in their buildings? This is not an issue for State or Local governments.

Councils reiterated the importance of an enforceable planning framework aligned with the Code of Conduct. How will breaches of the code be policed? Councils currently cannot provide sufficient enforcement officers to police noise legislation. The office of Fair Trading does not currently have sufficient staff to police this.

Who is going to come out during the middle of the night to police noisy short-term tenants keeping residents awake?

Who is going to police short-term tenants dumping rubbish in the carpark?

Who is going to police short-term tenants sorting their rubbish?

Who is going to get the short-term tenants out of the pool or gym, outside of by-law-controlled pool & gym operating hours?

Who is going to stop the short-term tenants smoking or taking drugs in the common areas?

Who is going to ensure the short-term tenants comply with the Fire and Emergency evacuation plans?

Who is going to stop the short-term tenants hanging their laundry on the balcony?

The only answer to all these questions and many others, is no one.

Lot Owners of Strata Plans should be able to enjoy the quiet and peaceful environment of their existing strata plans, without being subjected to STRA.

Leanne Nesbitt

Milsons Point NSW

10 September 2019

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Tuesday, 10 September 2019 11:25 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** recorded in DPIE subs register

Submitted on Tue, 10/09/2019 - 23:21

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Leanne

**Last name**

Nesbitt

**Name withheld**

No

## Info

**Email**

[leanne.nesbitt@bigpond.com](mailto:leanne.nesbitt@bigpond.com)

**Suburb/Town & Postcode**

Milsons Point 2061

**Submission file**

[objection-to-short-term-letting-package-submission-100919-lmn.pdf](#)

## **Submission**

My home is an apartment that I own in a multi story building in Milsons Point and I have several areas of serious concern with the short-term letting package proposed by the NSW Government:

### **1. Preservation of Owners' Rights:**

Residential apartment buildings in mixed use and commercial zones with express prohibitions or limitations on short term letting must have their by-laws respected and preserved. There can be no over-riding policy reason which dictates limitations on the right of apartment owners to collectively decide whether or not to permit short-term letting where this is the clear desire of the democratic majority.

### **2. Collective Cost of Permitted Short-term Letting**

Residential schemes must have authority to levy charges and fees on Hosts conducting short-term letting. The disproportionate cost to owners and owners' corporations from STRA operations (e.g. wear and tear of lifts, gyms, garbage and other utility areas as well as administration and management costs) means they are effectively subsidising those running STRA businesses. Security arrangements in individual buildings must not be compromised. The Hosts should also be required to advise the Owners Corporation of intent to let their property on a short-term basis and to pay any extra insurance costs levied on the building.

### **3. Preservation of Local Government Oversight**

Local Councils must have the ability to set and apply zoning restrictions to meet their strategic planning objectives. They should be involved in designing and be part of the compliance and enforcement function of any registration system.

### **4. Fire Safety Standards:**

The only way to ensure that mandatory fire safety standards are met is for STRA in residential strata schemes to be classed as "complying development" (not "exempt development") which allows for inspection by Local Council or a private certifier. In addition:

- (a) Fire safety standards should be more onerous for short-term holiday visitors in high-rise apartment buildings as the threat to life of all residents is increased significantly.
- (b) Fire standards applicable to residential apartment buildings do not address the fire risks of cooking, BBQ's or smoking on balconies which are common problems with short stay visitors unfamiliar with by-laws or local customs.
- (c) Fire safety in residential strata schemes must not be left to self-regulating platforms or amateur hosts as it poses an unacceptable risk to all residents.
- (d) Fire and Rescue NSW should have direct access to Register data such as how many STRA apartments are listed in a single high-rise building to enable accurate assessment in emergency situations.

### **5. Effective Registration:**

An independent, publicly funded registration system is essential to identify STRA properties, the owner/host, their agent or nominated representative as well as having data on address, location, intensity, volume, days of availability, days of occupation, number of rooms, etc. in order to develop a profile and analysis of the STRA industry. Other major cities such as New York, San Francisco, Barcelona, Paris, Toronto and Vancouver, who have experienced this industry, are now devising or implementing legislation to strictly regulate its operation. At the very least, NSW should have controls in place BEFORE allowing STRAs to operate in apartment buildings as well as enforceable and fast-acting conflict resolution processes.

Given the disparate issues involved with the regulation of AirBnB, Stayz and the like, the Milsons Point Community Group regards as essential the establishment of a Register run by either Government, local



Councils or a neutral platform, with powers that are time-sensitive, practically enforceable and of real utility to residential strata schemes. This Register must be necessary pre-requisite to any new regulatory framework. STRA can transform homes into hotel rooms and neighbours should not be obliged to give up their right to quiet enjoyment with bland reassurances about conflict resolution. Such a Register has been found to be helpful in somewhat alleviating these problems in cities overseas.

#### 6. Host's Registration Obligations:

There must be enforceable obligations for Hosts to register the premises before it is used for STRA purposes. Penalties should apply for unregistered premises. The Host should identify all platforms on which their property is listed, identify days of availability and report nights of occupations. Additionally, there must be a legal obligation for Platforms and agents not to list an unregistered residential dwelling for STRA. Again, there should be no change in planning laws in residential apartment buildings until the Register is in place.

#### 7. By-Law Enforcement:

In cases where a strata scheme has a by-law prohibiting STRA, it must not be possible for this to be circumvented by any person who is not an actual owner being registered as a host. In the case of residential tenants, there must be evidence that the landlord has expressly permitted the conduct of STRA by the lessee. STRA in strata buildings must require a complying certificate. This should be part of the registration process as it is essential data for regulatory oversight and enforcement.

#### 8. 180 Day Cap:

The proposed 180 day cap is unacceptable and excessive by world standards. It makes a mockery of the original intention that the caps were to be an economic lever to drive apartments back into the domestic residential market.

The rapid growth in short-term letting in recent years has had significant impact on apartment buildings as well as residents on areas such as amenity, strata costs and individual safety. Such growth has clearly outpaced regulation and owner's corporations should be given greater ability to manage these impacts. Under no circumstances should this industry be self-regulated.

#### 9. Some Questions to be answered:

Some questions which demand answers in relation to the proposal by the NSW Government are as follows:

Why are the NSW Department of Planning, Industry and Environment and Department of Customer Service dictating by-laws concerning STRA when there is already an extensive Strata Schemes Management Act 2015 covering the management and control of Strata Schemes? Surely this should be the right of individual Owners Corporations to decide if they want to prohibit STRA in their buildings? This is not an issue for State or Local governments.

Councils reiterated the importance of an enforceable planning framework aligned with the Code of Conduct. How will breaches of the code be policed? Councils currently cannot provide sufficient enforcement officers to police noise legislation. The office of Fair Trading does not currently have sufficient staff to police this.

Who is going to come out during the middle of the night to police noisy short-term tenants keeping residents awake?

Who is going to police short-term tenants dumping rubbish in the carpark?

Who is going to police short-term tenants sorting their rubbish?

Who is going to get the short-term tenants out of the pool or gym, outside of by-law-controlled pool & gym operating hours?

Who is going to stop the short-term tenants smoking or taking drugs in the common areas?

Who is going to ensure the short-term tenants comply with the Fire and Emergency evacuation plans?

Who is going to stop the short-term tenants hanging their laundry on the balcony?

The only answer to all these questions and many others, is no one.

Lot Owners of Strata Plans should be able to enjoy the quiet and peaceful environment of their existing strata plans, without being subjected to STRA.

Leanne Nesbitt  
Milsons Point NSW  
10 September 2019

**I agree to the above statement**

Yes

**From:** Lee Johnson <lee.johnson@iinet.net.au>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

#### STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

#### Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Lee Johnson  
99 Corrimal St  
Wollongong, Nsw 2500

**From:** Lee Sharples <charlee.sharples@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because I separated from my long term partner and I now depend on hosting as an economic lifeline to help pay the mortgage and bills (and for company at home sometimes). I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

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Thank you for reading my submission.

Regards,  
Lee Sharples  
2 Kensington St  
Waterloo, Nsw 2017

**From:** Leigh Hatch <lh19@me.com>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

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Specifically, I want to comment on the following:

#### STRA State Environmental Planning Policy

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Thank you for reading my submission.

Regards,  
Leigh Hatch  
7 Stanley Ave  
Mosman, Nsw 2088



**From:** Leighton Donnelly <leightondonelly@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because I provide a unique service to families not available through the traditional hotel industry. I am deeply concerned the NSWgovt is seeking to overregulate and spoil something that has been going on well before Airbnb even came into existence. This over regulation would cause a significant decline in regional tourism and economic activity my region of the blue Mountains. This area is dependant upon this industry and the range of alternative hotels here is very poor and not able to offer the same product

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

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approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Leighton Donelly  
94 Bradleys Head Rd  
Mosman, Nsw 2088

**From:** no-reply@planning.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Monday, 2 September 2019 10:02 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Purple category

Submitted on Mon, 02/09/2019 - 22:02

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

leighton

**Last name**

donelly

**Name withheld**

No

## Info

**Email**

[leightondonelly@hotmail.com](mailto:leightondonelly@hotmail.com)

**Suburb/Town & Postcode**

Mosman

**Submission**

This is diabolically poor policy. I have just completed a development in bushfire zone greater than BAL 29 for the express purpose of holiday rental. The house is built to comply with the latest bushfire codes and now i find i am unable to rent it for its intended usage.

Regional economies rely on this kind of accommodation which have been letted out prior to websites like Airbnb coming into existence.

Please do not apply unnecessary red tape which will have significant ramifications for regional economies. Commercial accommodation providers do not provide the same service, particularly in the blue mountains, where commercial hotels don't provide family or group friendly accommodation and are often either very high end (escarpment group) or of a very low standard. Neither option is family friendly.

A very significant portion of homes here are holiday rentals located on bushfire affected land where the host is not present. Many people have traditionally built homes here as holiday homes and not as a primary residence.

The system isn't broken so why is a NSW Liberal govt trying to 'fix' it with red tape. It does not make sense? Just because apartment tenants have made complaints about STRA in Bondi why change the rules for the whole state? The NSW govt have obviously not done sufficient research.

This policy will stifle my business with red tape, i find this unacceptable and will be considering launching a legal class action with some of the many other holiday home owners in bushfire zones against the NSW government should it proceed with these changes.

I don't believe that council will approve any development via DA for STRA where the rating is greater than BAL 29. I have found myself educating council about these new proposals which they have not seemed to be aware of. Council don't seem to know anything about this policy and who will be policing it, they are not resourced to do this.

This needs an urgent rethink

**I agree to the above statement**

Yes

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 4:31 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Rob submission 3.0, non Air BNB run

Submitted on Wed, 11/09/2019 - 16:30

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

**First name**

Leo

**Last name**

Patterson Ross

**Name withheld**

No

## Info

**Email**

[leo.patterson.ross@tenantsunion.org.au](mailto:leo.patterson.ross@tenantsunion.org.au)

**Suburb/Town & Postcode**

Surry Hills 2010

**Submission**

Uploaded

**I agree to the above statement**  
Yes

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 9:08 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

Submitted on Wed, 11/09/2019 - 09:04

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Leon

**Last name**

Williamson

**Name withheld**

No

## Info

**Email**

[lw113365@gmail.com](mailto:lw113365@gmail.com)

**Suburb/Town & Postcode**

Goulburn 2580

**Submission file**

[stra-submission-2019-09-11.pdf](#)

**Submission**

Att: Director, Housing and Infrastructure Policy

NSW Department of Planning, Industry and Environment

Dear Director,

please consider our submission regarding Short Term Accommodation reforms attached.

Yours faithfully,

Leon Williamson and Sasithorn Prasert

**I agree to the above statement**

Yes



## Short Term Rental Accommodation Discussion Paper Submission

Att: Director, Housing and Infrastructure Policy

NSW Department of Planning, Industry and Environment

GPO Box 39

SYDNEY NSW 2000

Dear Director

Please accept our submission regarding the proposed new regulatory framework for short-term rental accommodation (STRA) in NSW 2019

## Introduction:

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I am a self-funded retiree who lives in Goulburn with my wife. We run a small accommodation business from our home. We have two spare bedrooms which we rent to guests. We are able to provide short term accommodation for visitors to Goulburn in a friendly home environment at a reasonable cost.

The demographic profile of our guests is predominantly retirees who are on a road trip via Goulburn or who are coming to Goulburn to visit family or to attend other functions in the district.

Our premises are our family home. We are not locking up any housing stock from the market place, nor are we creating a nuisance for our neighbours. We are simply utilising a large house to provide an alternative accommodation experience for our guests. We provide accommodation in a tight market and promote our region in ways that the more impersonal types of accommodation cannot do.

## Planning Instruments

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We welcome the proposal in the **Draft State Environmental Planning Policy (Short term rental accommodation) 2019** which allows onsite hosts in a detached dwelling to be an exempt development and operate 365 days per year. We believe that this makes perfect sense in a regional town such as Goulburn where there are regular accommodation shortages. When there are big events on in town such as the NSW Police Academy Attestation Parade, Historic Motor Racing at Wakefield Park or The Australian Blues Music Festival just to name a few; all the accommodation in the district is fully booked.

We live onsite and personally welcome and supervise all guests. Each guest is given a safety induction and shown the evacuation plan as part of the check in process. This small scale activity does not create any noise, parking, waste management or other issues and there are no flood or fire hazards in our neighbourhood.

In our case we believe that we meet all of the criteria set out in section 11. *Exempt development—hosted short-term rental accommodation*

Regarding the **Environmental Planning and Assessment (Short-term Rental Accommodation)**

**Regulation 2019** we are sanguine about the pending requirement to install smoke detectors in each room and link them to exit lights. We do note however, that our premises is already compliant with fire safety regulations relating to residential housing in NSW and wonder why our guests need more protection than family members who may be staying in these rooms under different circumstances. We also note that we have spent in the order of \$75,000 to bring the property up to what we consider a reasonable standard to conduct our micro business and we will be required to spend upwards of 1-2 thousand dollars more to meet this requirement. It will take a very long time, if ever, to recoup this investment by renting 2 rooms.

## Code of Conduct

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We broadly agree with the objectives and definitions of the **Draft Code of Conduct for the Short-term Rental Accommodation Industry**. We do however see duplications of function between the code and the proposed industry led STRA register. Please see our comments in the next section, where we propose a self-regulatory model incorporating the Code of Conduct and the Industry Register.

We believe that the general obligations on industry participants are adequate. We urge that any reports or data collection required by the Secretary be kept to a minimum and be done in cost effective ways. As hosts we do not have huge administrative resources or skills to meet onerous reporting schedules. We would recommend that the reporting be done by the booking platforms or agents, who have sophisticated data processing software at their disposal.

There are a couple of clauses in the draft Code of Conduct which we find curious. In 5.4.6 it mandates that a host must give the guest the contact details of a) an emergency electrical provider and b) an emergency plumbing provider. If the host is present, as in our case, why would the guest not contact us in the case of a plumbing or electrical failure? Furthermore, who would pay the bill for an emergency electrical or plumbing provider if the reporting was vexatious or ill informed? For example, a blown light bulb or a leaking tap would hardly warrant an emergency call out.

Another clause in the draft which caused us some concern is 5.4.11. This relates to a guest who may be on the exclusion register. Is the regulation requiring a host to vet every potential guest before offering accommodation? If this clause is included in the final version it opens up a minefield of privacy, self-disclosure and cost concerns. Would a host who unknowingly offers accommodation to a guest on the exclusion register face a penalty? We think that there is room to improve these aspects of the code. We also believe the booking platforms would be best placed to administer the exclusion register. Because we are onsite hosts we never have issues with poor behaviour of guests.

Fees and cost recovery will be a vexed issue. There are a vast range of operators within the STRA industry. These range from small providers such as our own 2 bedroom operation; to investors who own several units in the city; to farm stays where there may be up to 12 or more bunk beds in a particular location. Similarly, there is a vast range of prices charged for STRA depending on location and demand. For example a 2 bedroom unit 5 minutes from the International airport attracts a much higher fee than a bedroom in a house in Goulburn NSW. Therefore, to charge a flat fee to all participants to administer the Code is patently unfair. An alternative model along the lines of a percentage of bed nights booked per operator would be fairer to all stakeholders.

## Proposed industry-led STRA property register

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We have deep reservations about the establishment of an industry led STRA property register. As an exempt development under the SEPP (STRA) 2019 we advocate that the same philosophy apply to us in relation to the register. That is, onsite hosts with no more than 2 rooms available be exempt from the register. The government should consider a form of self-regulation for operators who fall into the compliant development category in SEPP (STRA) 2019.

There is considerable duplication of processes between the role of the Secretary in administering the Code of Conduct and the proposed functions of the Register. The STRA industry could administer the Code of Conduct and the upkeep of the register could be part of that administration for compliant developments. This would avoid the duplication and excessive costs which will inevitably occur under the current proposal.

The STRA industry already has a very effective form of self-regulation via the review system used on the booking platforms. We receive constant feedback from our guests and are able to give them feedback in return. The booking platforms hold considerable data on each operator which could easily be transferred into a register to meet the objectives of the proposal. These processes could be readily merged with the objectives of the Code of Conduct, thus streamlining the entire framework.

Having expressed our preference to be exempt from an industry led STRA register, we would like to outline some of the issues we see associated with the establishment of such a separate register.

What is the peak body of the STRA Industry who would administer the Register? If none exists, then a body would have to be established with all the accompanying processes, complexities and costs involved.

The body to administer the register would have to consist of hosts, booking platforms and agents. None of these entities would participate without some cost recovery. Inevitably, there will be another round of fees to be paid in circumstances where margins are already thin.

The only way to recoup the costs of administering the Register would be to impose a levy on the participants. Inevitably, the cost would be borne by hosts and ultimately by guests, thus making the

cost of accommodation higher. If this were to occur we would advocate adding a line on our invoices which indicate that a certain proportion of the cost of accommodation goes towards meeting compliance requirements. This would be similar to the approach insurance companies now use for the Fire levy which is added to insurance premiums. The other alternative for micro operators such as ourselves would be to close our businesses if we feared that we are being priced out of the market.

The government would have to oversee the establishment of the register and cap the costs of maintaining the register to prevent the peak body from becoming an entity which exists for its own benefit to the detriment of other stakeholders.

As soon as there is a register, there needs to be another layer of audit processes, oversight and penalties for non-compliance; all resulting in increased costs and complexity for small operators.

Notwithstanding the above reservations, if a register is to be established it should collect the absolute minimum amount of data required to ensure compliance with the SEPP and the Code of Conduct. This would include:

- registered business name,
- ABN
- name of principal/s,
- address of premises,
- number of beds available and
- number of days available.

It should also include fields that indicate if a business is an exempt or compliant development and if it meets the fire safety regulations.

Local and State governments would need to have access to this information on demand. The information would have to be subject to the usual privacy provisions which currently exist.

The only information which should be made publicly available would be the name and address of the premises registered. The register should not become a de facto booking site.

The more we consider the implications and complexities of the register the more uncomfortable we become. We fear that our little business, set up to supplement the superannuation pension has the potential to become an albatross about our necks.

## Conclusion

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Thank you for the opportunity to make this submission. We have submitted our thoughts in good faith and in the context of our business.

Our overwhelming concern after working through the discussion questions and wading through the documents is that the STRA landscape is about to be drowned in bureaucracy and additional costs. This will be to the detriment of the industry and what it contributes to the NSW economy, particularly in remote and regional areas.

The government must bear in mind that the booking platforms already redeem between 12-14% of the booking fee in commissions from the host. Any additional compliance costs will be passed on to the hosts by the booking platforms and agents. It is imperative to make compliance with the code, including reporting functions as straightforward and cost effective as possible and to avoid duplication.

We are small and vulnerable. We only get a small return on our investment of over \$75000. We are not the smart operators who buy up multiple units in the city or in the popular holiday spots and pay for them using short term rental and negative gearing. We do not contribute to the angst felt by neighbours in strata properties or those adjacent to party houses.

We do however provide an amenity in the regional town in which we operate. We provide an experience that our guests; both domestic and international appreciate and we contribute to the local economy of restaurants, service stations and local tourism events.

## Recommendations

---

We recommend that the government adopt the Draft State Environmental Planning Policy (Short term rental accommodation) 2019 with the current provisions for exempt and compliant developments.

We recommend that the government adopt the Environmental Planning and Assessment (Short-term Rental Accommodation) Regulation 2019 relating to fire safety.

We recommend that the government merge the functions of the Code of Conduct and the STRA register under an industry led self- regulation model

We urge the government to recognise that micro businesses such as ours work on small budgets and have tight margins. Too onerous a regulatory regime could have the effect of forcing us out of business and thus undermining the demonstrated benefit to the NSW economy of the STRA industry in remote and regional areas.

Leon Williamson and Sasithorn Prasert.

Wombermere

20 Australia St, Goulburn NSW 2580

**From:** Leon Williamson <lw113365@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:21 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I am a self-funded retiree living in Goulburn with my wife. We run a small business from our home in which we provide short term accommodation for visitors to Goulburn in a friendly home environment at a reasonable cost. We started our business in November 2017. In August 2018 we made a submission to the Dept of Housing and Planning regarding the impact of proposed changes to STHL legislation in NSW. We received a letter from the Minister for Planning, Minister for Housing, Special Minister of State the Hon Anthony Roberts MP via our local member the Hon Pru Goward on 8th October 2018. The letter stated that in our situation, there would be no limit on the number of days we could operate and that our property would be considered an exempt development. Recently, we received information from Airbnb that the policy is again up for review.

We are concerned that the pending legislation to regulate STHL properties will restrict our ability to run our business. Our understanding of the purpose of the legislation is that it aims to control the burgeoning growth of short term accommodation in strata properties predominantly in the busy parts of the major cities. The impact of this on the housing market and on the amenity of other residents in strata units has been well addressed in the Options Paper of 2017.

However, we do not fall into the above categories. Our premises are our family home. We are not locking up any housing stock from the market place, nor are we creating a nuisance for our neighbours. We are simply utilising a large house to provide an alternative accommodation experience for our guests. We live onsite and personally welcome and supervise all guests. We also provide additional accommodation in a tight market and promote Goulburn in ways that the more impersonal types of accommodation cannot do.

The demographic profile of our guests is predominantly retirees who are on a road trip via Goulburn or who are coming to Goulburn to visit family or to attend other functions in the district. For example we recently hosted guests who were in Goulburn to attend the attestation parade at the Police Academy. (On that particular day, all accommodation in Goulburn was booked out.) This activity does not create any noise, parking or waste management issues in our neighbourhood.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

#### STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

#### Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Leon Williamson

20 Australia St  
Goulburn, Nsw 2580



**From:** Leonie Edwards <leonie.edwards@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:23 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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Thank you for reading my submission.

Regards,  
Leonie Edwards  
55 Second Ave  
Erowal Bay, Nsw 2540

**From:** Leonie Hull <leoniehull1957@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

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Thank you for reading my submission.

Regards,  
Leonie Hull  
19 Boronia St  
Sawtell, Nsw 2452

**From:** Lesley Burrett <lelb@midcoast.com.au>  
**Sent:** Wednesday, 11 September 2019 2:22 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

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Thank you for reading my submission.

Regards,  
Lesley Burrett  
138 Theresa St  
South Kempsey, Nsw 2440

**From:** Lesley Ritchie <lfritchie@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

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Thank you for reading my submission.

Regards,  
Lesley Ritchie  
28 John Sharpe St  
East Ballina, Nsw 2478



**Draft**  
**LGNSW Submission on *Short Term Rental***  
***Accommodation – Regulatory Framework***

September 2019

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## 1. Opening

LGNSW is the peak body for local government in NSW, representing NSW general purpose councils and related entities. LGNSW facilitates the development of an effective community based system of local government in the State.

LGNSW welcomes the opportunity to make a submission to the Department of Planning, Industry and Environment (DPIE) and Department of Customer Service (DCS) on the proposed new regulatory framework for Short Term Rental Accommodation (STRA).

It is pleasing that our previous calls for consultation on the entire STRA package were heard and that the draft planning instruments, code of conduct and supporting regulations have been exhibited together. It is essential that councils and others view the related legislative proposals and documents in a single package.

LGNSW supports the integrated regulatory approach for STRA which comprises the mandatory code of conduct and new state-wide planning regulations. LGNSW also welcomes the proposal for a registration system, but we believe it must be overseen by the NSW Government, not industry-run.

This submission is informed by consultation with our metropolitan and regional members through a survey and council forum.<sup>1</sup> It contains comments on the overall regulatory framework and highlights local government's particular concerns and recommendations. This submission makes 15 recommendations, with key highlights summarised below:

- The NSW Government must recognise that enforcement of the planning provisions will in some areas, impose additional time and resources for councils. The proposed cost-recovery measures must include a component to assist local government deal with the additional compliance costs associated with the new framework.
- The state-wide 'blanket' provisions for annual STRA thresholds are not applicable or appropriate in every area, so it is crucial for councils to be able to tailor the policy to suit local conditions.
- LGNSW recognises the importance and benefits of short-term rental accommodation to local economies, and considers it is critical to have a robust and respected regulatory framework that balances the economic benefits and the potential negative impacts of STRA. We are concerned, however, that the relatively generous provisions for STRA in NSW appear to be moving in the opposite direction from those being imposed by overseas jurisdictions.
- Overseas experience of the effects of STRA on amenity, community and housing affordability has led to a tightening of the regulations for short-term letting. In NSW, all stakeholders acknowledge that the industry is growing rapidly and a regulatory framework is needed to manage this escalating trend and balance the benefits and impacts. LGNSW urges the government to implement a robust and respected STRA framework from the outset or we risk being unable to achieve this balance. We have recently witnessed the consequences of a weak regulatory system in relation to the building industry, and local government wants to avoid any unmanageable and undesirable outcomes arising from rapid industry growth and inadequate regulation. It is therefore critical to ensure the planning requirements, Code of Conduct and the property register are enforceable and all participants agree to accept their responsibilities.

---

<sup>1</sup> Council forum (September 2019): 17 council officers participated; member survey (August 2019): 37 council representatives (elected, general managers and senior staff) responded.

While LGNSW undertook preliminary consultation with members, the exhibition period has not been sufficient to enable detailed consultation and analysis of the proposals. The limited timeframe is particularly challenging for councils because a 28-day consultation period is inadequate to accommodate public consultation and council meeting cycles. LGNSW would like the relevant agencies to further engage with councils to resolve the detailed implementation elements before implementation commences.

This is a draft submission awaiting review by the LGNSW Board. Any revisions will be forwarded in due course.

## 2. Background

The NSW Government has proposed an integrated policy framework for STRA, which includes a state-wide planning framework, a mandatory Code of Conduct for STRA and related regulation.

The following documents set out the proposed framework:

- a) Short-term Rental Accommodation: A new regulatory framework discussion paper
- b) Draft Code of Conduct for the Short-term Rental Accommodation Industry
- c) Draft Fair Trading Amendment (Code of Conduct for Short-term Rental Accommodation Industry) Regulation 2019
- d) Draft State Environmental Planning Policy (Short-term Rental Accommodation) 2019
- e) Draft Environmental Planning and Assessment (Short-term Rental Accommodation) Regulation 2019 and accompanying 'Short-term Rental Fire Safety Standard'.

The key elements of the integrated framework are summarised below:

<b>Planning Framework</b>	<p>The draft State Environmental Planning Policy (Short-term Rental Accommodation) 2019 will introduce:</p> <ul style="list-style-type: none"> <li>- A new definition of STRA.</li> <li>- New 'exempt' and 'complying' approval pathways that enable STRA within certain day limits:</li> </ul> <p><b>Where the host is present</b>, STRA is 'exempt development' for 365 days per calendar year.</p> <p><b>Where the host is not present</b>, and the site is not on bushfire prone land or a flood control lot, STRA is 'exempt development' for:</p> <ul style="list-style-type: none"> <li>▪ 180 days in Greater Sydney; and</li> <li>▪ 365 days in regional areas; except where a council varies this to no lower than 180 days.</li> </ul> <p>Where the host is not present, and the booking is for 21 or more consecutive days, the booking will not count towards the above day thresholds.</p> <ul style="list-style-type: none"> <li>• A Fire Safety Standard which will apply to dwellings used for STRA, and an amendment to the <i>Environmental Planning and Assessment Regulation 2000</i> to introduce this.</li> </ul>
<b>Code of Conduct</b>	A draft Code of Conduct for the STRA Industry that will apply to hosts, guests, online booking platforms and letting agents.

	A draft <i>Fair Trading Amendment (Code of Conduct for STRA) Regulation 2019</i> that will support the Code's implementation.
<b>Register</b>	The NSW Government is considering introduction of a new industry-led STRA property register.

### 3. LGNSW position on integrated STRA framework

LGNSW recognises the contribution and benefits of STRA to local economies but considers that regulation of the industry is needed to balance the interests of industry participants while managing impacts on local communities across NSW. (See previous submissions<sup>2</sup>.)

While the proposed framework has brought together the planning and industry regulation and addresses some previously raised issues, LGNSW has concerns about the practical implementation of the framework. These are discussed below.

#### 3.1 Integrated Approach

LGNSW supports an integrated approach to STRA but there are some requirements in the planning instrument, Code of Conduct and regulation documents that could be better linked or clarified to minimise regulation issues for councils and confusion within the industry.

For example:

- Provisions in the SEPP should include a requirement to comply with registration and compliance under the *Fair Trading Amendment Regulation 2019* prior to the properties being used for STRA.
- Although the discussion paper indicates that the Commissioner for Fair Trading will be responsible for administering and enforcing the Code of Conduct and the exclusion register, including complaint handling (page 14), councils are concerned communities will expect them to be involved which will have cost and resourcing implications. (This is discussed further in section 3.3.)

#### 3.2 Planning Instruments

##### a) Day limits for STRA

The proposed framework enables STRA to occur in residentially zoned premises without planning approval, with certain caps imposed. Where STRA is **hosted** (i.e. the owner is on the premises sharing their home with the guest(s)), this can occur all year round and is supported by local government<sup>3</sup>. However, it is where STRA is not hosted that presents the most significant concerns across the local government sector. In Greater Sydney, **un-hosted** STRA is permissible in residential premises for 180 days each year. Regional councils on the other hand have flexibility to decide whether to impose a 180-day threshold, or whether to permit STRA to occur all year round.

<sup>2</sup> See LGNSW Submissions to: STRA Explanation of Intended Effect (EIE), Oct 2018; and *Short-Term Holiday Letting (STHL) Options Paper*, Oct 2017

<sup>3</sup> More than 60 percent of our survey respondents said they agree with the proposal that where the host is present, STRA properties are 'exempt development' for 365 days per year. One respondent disagreed, with the remainder being 'unsure'.

LGNSW welcomes the allowance given to regional councils to nominate different day limits for un-hosted STRA. It is noted that the SEPP limits un-hosted STRA to 180 days in the council areas of Ballina, Lake Macquarie, Clarence Valley (in specific mapped areas) and Muswellbrook (in specific mapped areas).

Consultation with our members confirmed there are wide-ranging preferences across local government in NSW relating to the day limits for un-hosted STRA, from 30 days in some council areas to having no limit in other areas, depending on their local circumstances. State-wide 'blanket' provisions are not appropriate in every area. To address this variation and diversity, there should be provisions built into the framework to enable all councils to determine the number of days that properties can be used for STRA in their local government areas, and to stipulate areas where day limits apply so they can balance local economic, tourism and long-term housing needs. LGNSW has welcomed the provision for the 90-day limit in Byron Bay allowed for under Ministerial Direction 3.7.

**Recommendation 1:**

***Councils must be able to consider the potential impacts of STRA based on their local circumstances and be empowered to make decisions regarding the maximum number of days for un-hosted STRA. This must be more flexible and not be restricted to an upper limit threshold of 180 days.***

LGNSW does not support the new provision that un-hosted bookings of STRA for 21 or more consecutive days should not contribute to applicable day thresholds. Councils see this provision as problematic and may be a loophole which would facilitate year-round short term letting in residential premises.<sup>4</sup> It may effectively allow for the permanent use of the property for STRA. Issues raised by our members include difficulties in measuring and compliance and its potential use by landlords to avoid requirements under the *Residential Tenancies Act* for properties rented to longer term tenants.

**Recommendation 2:**

***LGNSW recommends deletion of the 21-day consecutive booking provision to remove potential loopholes that could allow year-round short-term letting in residential areas.***

## **b) Compliance with exempt and complying development provisions**

While STRA is generally supported and a regulatory framework is welcomed by local government, overwhelmingly, councils are concerned about the ability to ensure compliance under the proposed exempt and complying development pathways. Key areas where this is a concern include:

- How to verify that the host is present;
- Fire safety certificates required under Part 2, Clause 9 (2) (c) of the draft SEPP;

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<sup>4</sup> Comments from respondents in our member survey:

- "The exemption provided by booking for 21 or more consecutive days does not count to the day cap can potentially make the 180 day cap redundant (i.e. can be exploited as a loophole)".
- "There is no effective mechanism to prove non-compliance, particularly with the 21 day exclusion."
- "With the inclusion of the 21 days not being counted in the 180 days, it virtually means that residential accommodation will morph into full time 'short term stays' at the detriment of long term residents seeking accommodation."

- The maximum number of persons per bedroom and total persons allowed under Part 3, Division 1, Clause 11 (b) of the SEPP; and
- Difficulty enforcing compliance with the number of days particularly with an industry-led register. (More than three-quarters of respondents in our member survey said their council is concerned about how compliance with the number of days a property is used for STRA will be enforced.)

As evidenced in our member survey, councils report the difficulty in gathering the evidence required to ensure compliance with the planning provisions for STRA:

*"It is unclear as to how the number of days will be monitored and enforced."*

*"Information about properties must be made available to local government for compliance purposes and also for data collection in relation to housing."*

*"Without registration and record keeping [it is] impossible to enforce."*

**Recommendation 3:**

***Local government strongly supports the proposed property register which is critical to provide data for regulatory compliance and enforcement. We recommend the register is overseen by the NSW Government, not industry-run.***

**c) Bushfire prone land and flood control lots**

Risks associated with bushfires and flooding are important considerations. In terms of practical implementation, the draft SEPP requires un-hosted STRA properties on bushfire and flood prone land to satisfy certain requirements. These will be regulated as complying development. It is likely that there will be existing dwellings used for STRA in those areas raising the question of existing use rights. Once the SEPP commences, these properties may not comply with the proposed provisions. Councils in some regional areas have raised the issue that the extent of these bushfire provisions will apply to large areas and may be too considered restrictive. This could have the perverse effect of restricting STRA in areas where councils rely on this form of accommodation as a significant contribution to their local economy.

**Recommendation 4:**

***LGNSW recommends that the DPIE work with councils to identify possible options and provisions in the SEPP to address this issue.***

**d) Relationship to state and local housing objectives**

The SEPP excludes certain forms of dwellings from its operation (e.g. boarding houses, seniors housing, group homes), but does not exclude dwellings such as those approved for affordable housing under the *Affordable Rental Housing SEPP2009 (ARHSEPP)* and *SEPP No. 70 - Affordable Housing (Revised Schemes)*. This means that in some areas where STRA is highly sought-after, the core objectives of these state policies for affordable housing could be undermined by the use of these dwellings for STRA. Evidence of this was reported following the publication of a recent study<sup>5</sup> in the Byron Shire LGA:

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<sup>5</sup> Southern Cross University, Airbnb in the Byron Shire— Bane or Blessing? An Investigation into the Nature and Range of Impacts of Airbnb on a Local Community, March 2019



“Almost 100 Byron Shire residents say they have been forced out of rental properties so owners could list them as short-term holiday lettings (STHL) on Airbnb or other STHL platforms, according to new research from Southern Cross University.”<sup>6</sup>

In areas of high tourist demand where a significant number of properties are being used for STRA, the balance between residential and commercial may shift and therefore undermine the planning outcomes (and importantly the housing objectives) of local planning schemes.

**Recommendation 5:**

***LGNSW recommends that DPIE clarifies and rationalises its objectives in different state housing policies so that important affordable housing objectives are prioritised and are not undermined by unintended effects of the STRA policy.***

**e) Fire Safety Regulation**

Ensuring appropriate and adequate fire safety standards for STRA are in place and well-understood by STRA operators is essential. Oversight of fire safety compliance is critical, but councils are concerned about a lack of clarity around compliance requirements for fire safety and their ability to determine compliance with the fire safety provisions, for dwellings being used for STRA. The fire safety provisions applicable to STRA properties should be clearly reflected in the Code of Conduct and draft SEPP. In the exhibited documents, the code is silent on fire safety inspections and the only reference to the fire safety regulation in the draft SEPP is a note under Part 3 of the draft SEPP (page 7). This is not clear enough and could be easily missed by STRA operators.

**Recommendation 6:**

***The draft SEPP should be amended to include fire safety as a specific clause, to ensure that fire safety standards are not overlooked by STRA operators.***

For STRA under exempt development, there is no annual certification required and therefore councils will not know if the fire safety requirements are being maintained. The provisions need to be amended to address this, and council practitioners have suggested clause 16 of the boarding house SEPP (ARHSEPP) might be a model provision; it states that within 12 months of registration the fire safety requirements must be met.

**Recommendation 7:**

***A mechanism is needed to ensure the fire safety requirements in STRA properties are being met and maintained, and fire safety provisions for boarding houses in the ARHSEPP could provide a suitable model.***

**f) Other comments**

Councils have identified some potential unintended consequences of the STRA provisions:

- Developers of high-rise buildings may rely on the STRA provisions to withhold dwellings from the (sale or long term-rental) market (but allow their use as STRA) until the warranty period for major building defects has passed.
- The policy has no provision to restrict the number of properties being made available for use as STRA. In some sought-after STRA locations (e.g. within the City of Sydney, Waverley and other LGAs), the potential use of whole blocks of apartments for STRA could effectively turn them into tourist accommodation (quasi hotels).

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<sup>6</sup> <https://www.echo.net.au/2019/03/byron-residents-say-airbnb/>



**Recommendation 8:**

***The 12-month review of the STRA framework should assess any potential unintended consequences. This should include concerns about the withholding of properties for use as STRA by developers during the building defects warranty period; and intensification of STRA uses within entire residential apartment buildings, rendering them as quasi hotels.***

- Potential for landlords to use the 21-day provision to avoid requirements under the Residential Tenancies Act for properties rented to longer term tenants. As discussed in section 3.2a), **LGNSW recommends removing the 21-day provision.**
- The Code of Conduct does not discuss swimming pool compliance; this is a concern raised by some councils which should be addressed in the regulatory package.

**Recommendation 9:**

***LGNSW recommends that DPIE work with councils to ensure that swimming pool compliance is addressed in the regulatory package for STRA.***

### 3.3 Code of Conduct and complaints management

A strong and enforceable Code of Conduct applicable to all STRA participants is necessary to ensure the framework has integrity and is respected by all in the community – both STRA participants and the community. However, there is some concern about how councils will be able to effectively manage compliance of the proposed framework, respond to complaints and the resourcing and cost impacts.

While the framework seeks to address amenity impacts through the Code of Conduct and regulation under the *Fair Trading Act 1987*, councils are concerned that they will still receive and be expected to deal with complaints, which may have **considerable cost and resourcing implications for councils**. This was reflected by some respondents in our member survey:

*“Councils will shoulder most of the compliance burden, not Fair Trading.”*

*“We cannot resource this compliance.”*

The discussion paper (p.14) notes that the NSW Government “intends the administration and enforcement of the Code to be cost neutral to government” and various cost recovery methods are canvassed. Yet, there is no recognition in the discussion paper of the cost implications for councils or mechanisms for councils to recoup these costs and this is a concern for local government. It is assumed that the Commissioner for Fair trading will be responsible for compliance, with costs recovered through fees paid by industry participants. LGNSW endorses this principle that those benefiting from the STRA provisions must contribute to the cost of ensuring the new integrated framework works effectively and meets its objectives. However, this must include the compliance costs to local government.

**Recommendation 10:**

***STRA participants should be required to pay a fee to cover the costs of regulation and compliance. Cost recovery mechanisms must take into account the costs to councils, to prevent cost shifting.***

To help minimise the impacts of the anticipated additional compliance load on councils, adequate resources such as websites and public information programs for participants and local communities are required. (Refer to section 3.6.)

A further issue is the need for greater clarity about the relationship between breaches of the Code of Conduct and compliance with the SEPP.

### 3.4 Registration system

LGNSW has been advocating for a registration system for STRA for some time, and therefore welcomes the proposal to introduce a property register. Councils are not confident that an industry-led register will provide the available real-time data and information to implement compliance and this could undermine the integrity of the entire STRA framework. **Councils believe strongly that the register must be administered by the NSW Government (Department of Customer Service) and that the information in the register must be easily accessible and available in real-time to assist with compliance. The register must include up-to-date, accurate information on bookings, property compliance (number of bedrooms, number of guests etc), owner and host details.**

As recommended in section 3.2 b), LGNSW supports the proposed property register but recommends the register is overseen by the NSW Government, not industry-run.

**Recommendation 11:**

***Clarification is required as to whether the register would include existing properties being used for STRA and how this will be required.***

### 3.5 Implementation, Monitoring and Review

Further work on the proposed framework is required and councils must be engaged directly to resolve their specific implementation issues before implementation commences.

The property registration system and the Code of Conduct also must be in place before the SEPP commences.

**Recommendation 12:**

***The SEPP should not commence until the property register and the Code of Conduct are in place and specific issues are resolved in consultation with councils.***

When all components of the framework are in place, LGNSW supports the government's intention to undertake a review after 12 months operation. This review is important so that any unintended consequences or provisions that are not operating effectively can be addressed. However, LGNSW recommends that this is followed by a more comprehensive review of the framework 3-5 years after commencement.

**Recommendation 13:**

***When all components of the framework are in place, a review after 12 months operation is supported and a further review in 3-5 years is recommended.***

Many councils are concerned that the expansion of STRA is impacting the affordability and availability of long-term rental accommodation. As the use of residential properties for STRA may cause increased housing stress, LGNSW suggests that ongoing research be undertaken to measure the long-term impacts of STRA on local housing markets.

**Recommendation 14:**

***LGNSW reiterates its previous calls for the NSW Government to commit funds for the ongoing research beyond the first year of implementation of STRA, and engage directly with councils to monitor the local impacts of STRA and inform future policy directions.***

### **3.6 Public Education and Awareness**

Once finalised, the implementation of the new framework should be supported by a public education and awareness program, including a dedicated webpage, hotlines and clear user guides and brochures, so the community and STRA participants know who is responsible for what, and where to go to register, learn how to comply and to raise any concerns.

**Recommendation 15:**

***A strong public education program and dedicated communication material, delivered by the relevant state agencies in conjunction with industry, is considered essential for the effective regulation and implementation of STRA uses.***

## 4. Conclusion

LGNSW welcomes the consultation of the entire STRA package, which has allowed councils to view these documents together. LGNSW supports an integrated approach to STRA but in some areas the planning instrument, compliance and regulation components proposed are not sufficiently linked and could present regulation issues for councils and confusion within the industry. LGNSW encourages the DPIE to engage closely with councils to iron out their specific implementation concerns.

LGNSW believes the 'blanket' provisions in the policy are not appropriate in every area, and the inability for councils to specify a day cap less than 180 days does not provide sufficient flexibility. In many instances, councils have elected not to limit the STRA threshold in their area, while other councils consider much tighter provisions may be necessary. To manage the impact of STRA to suit the diverse locations across NSW and potential impacts of STRA in different areas, it is crucial that the SEPP includes provisions that would allow councils to tailor the thresholds to suit certain local conditions and that these should not be capped at 180 days. The provision that un-hosted bookings of STRA for 21 or more consecutive days not contribute to applicable day thresholds is seen as problematic therefore removal of this provision is recommended.

LGNSW recommends that the DPIE work with councils to identify possible options and provisions in the SEPP that will address councils' concerns to manage risks and compliance concerns associated with bushfires, flooding and swimming pools. A further issue is the need for greater clarity about the relationship between breaches of the Code of Conduct and compliance with the SEPP.

The Code of Conduct and proposed property register are supported, however LGNSW recommends the register be administered by the NSW Government rather than an industry-led register as proposed and data should be available in real-time to councils. Councils have raised questions about their responsibilities and role (and perceived role) in managing compliance, particularly in relation to the planning provisions and the resourcing and cost impacts.

LGNSW considers that further work and engagement with councils is required to address the issues raised. The SEPP should not commence until the property register and the Code of Conduct are in place and the above issues are resolved in consultation with councils. When all components of the framework are in place, a review after 12 months operation is supported and a further review in 3-5 years is recommended.

For further information in relation to this submission, please contact Jane Partridge, Strategy Manager, Planning and Transport, on 02 9242 4093 or [jane.partridge@lgnsw.org.au](mailto:jane.partridge@lgnsw.org.au).

## **Appendix: Summary of Recommendations**

Recommendation 1: *Councils must be able to consider the potential impacts of STRA based on their local circumstances and be empowered to make decisions regarding the maximum number of days for un-hosted STRA. This must be more flexible and not be restricted to an upper limit threshold of 180 days.*

Recommendation 2: *LGNSW recommends deletion of the 21-day consecutive booking provision to remove potential loopholes that could allow year-round short-term letting in residential areas.*

Recommendation 3: *Local government strongly supports the proposed property register which is critical to provide data for regulatory compliance and enforcement. We recommend the register is overseen by the NSW Government, not industry-run.*

Recommendation 4: *LGNSW recommends that the DPIE work with councils to identify possible options and provisions in the SEPP to address this issue.*

Recommendation 5: *LGNSW recommends that DPIE clarifies and rationalises its objectives in different state housing policies so that important affordable housing objectives are prioritised and are not undermined by unintended effects of the STRA policy.*

Recommendation 6: *The draft SEPP should be amended to include fire safety as a specific clause, to ensure that fire safety standards are not overlooked by STRA operators.*

Recommendation 7: *A mechanism is needed to ensure the fire safety requirements in STRA properties are being met and maintained, and fire safety provisions for boarding houses in the ARHSEPP could provide a suitable model.*

Recommendation 8: *The 12-month review of the STRA framework should assess any potential unintended consequences. This should include concerns about the withholding of properties for use as STRA by developers during the building defects warranty period; and intensification of STRA uses within entire residential apartment buildings, rendering them as quasi hotels.*

Recommendation 9: *LGNSW recommends that DPIE work with councils to ensure that swimming pool compliance is addressed in the regulatory package for STRA.*

Recommendation 10: *STRA participants should be required to pay a fee to cover the costs of regulation and compliance. Cost recovery mechanisms must take into account the costs to councils, to prevent cost shifting.*

Recommendation 11: *Clarification is required as to whether the register would include existing properties being used for STRA and how this will be required.*

Recommendation 12: *The SEPP should not commence until the property register and the Code of Conduct are in place and specific issues are resolved in consultation with councils.*

Recommendation 13: *When all components of the framework are in place, a review after 12 months operation is supported and a further review in 3-5 years is recommended.*

Recommendation 14: *LGNSW reiterates its previous calls for the NSW Government to commit funds for the ongoing research beyond the first year of implementation of STRA and engage directly with councils to monitor the local impacts of STRA and inform future policy directions.*

Recommendation 15: *A strong public education program and dedicated communication material, delivered by the relevant state agencies in conjunction with industry, is considered essential for the effective regulation and implementation of STRA uses.*

**From:** Suzie Hatherly  
**Sent:** Wednesday, 18 September 2019 5:14 PM  
**To:** Tessa Parmeter  
**Subject:** FW: STRA Regulatory Framework - LGNSW Submission  
**Attachments:** LGNSW submission on Short-term rental accommodation (STRA) Regulatory Framework .pdf

For logging and saving please.

Thanks  
Suzie

---

**From:** Sandy Chappel <[Sandy.Chappel@planning.nsw.gov.au](mailto:Sandy.Chappel@planning.nsw.gov.au)>  
**Sent:** Wednesday, 18 September 2019 5:11 PM  
**To:** Suzie Hatherly <[Suzie.Hatherly@planning.nsw.gov.au](mailto:Suzie.Hatherly@planning.nsw.gov.au)>  
**Subject:** FW: STRA Regulatory Framework - LGNSW Submission

Hi  
Here is LGNSW's submission.  
Thanks  
Sandy

---

**From:** Vanessa Burow <[Vanessa.Burow@lgnsw.org.au](mailto:Vanessa.Burow@lgnsw.org.au)>  
**Sent:** Wednesday, 18 September 2019 4:26 PM  
**To:** Sandy Chappel <[Sandy.Chappel@planning.nsw.gov.au](mailto:Sandy.Chappel@planning.nsw.gov.au)>  
**Cc:** Jane Partridge <[Jane.Partridge@lgnsw.org.au](mailto:Jane.Partridge@lgnsw.org.au)>; Linda Blinkhorn <[Linda.Blinkhorn@lgnsw.org.au](mailto:Linda.Blinkhorn@lgnsw.org.au)>  
**Subject:** STRA Regulatory Framework - LGNSW Submission

Hi Sandy

Thanks for providing an extension to submit feedback on the STRA Regulatory Framework.

Please see attached LGNSW's submission for your consideration.

If you have any queries, please let me know.

Kind regards  
Vanessa

VANESSA BUROW  
**SENIOR POLICY OFFICER - PLANNING  
LOCAL GOVERNMENT NSW**

T 02 9242 4025  
[VANESSA.BUROW@LGNSW.ORG.AU](mailto:VANESSA.BUROW@LGNSW.ORG.AU)

(Tuesday, Wednesday, Friday)



---

**From:** Sandy Chappel <[Sandy.Chappel@planning.nsw.gov.au](mailto:Sandy.Chappel@planning.nsw.gov.au)>  
**Sent:** Wednesday, 11 September 2019 4:45 PM  
**To:** Jane Partridge <[Jane.Partridge@lgnsw.org.au](mailto:Jane.Partridge@lgnsw.org.au)>  
**Cc:** Linda Blinkhorn <[Linda.Blinkhorn@lgnsw.org.au](mailto:Linda.Blinkhorn@lgnsw.org.au)>; Vanessa Burow <[Vanessa.Burow@lgnsw.org.au](mailto:Vanessa.Burow@lgnsw.org.au)>  
**Subject:** RE: STRA Regulatory Framework - LGNSW Preliminary Comments

Hi Jane  
Thank you very much.  
Sandy

---

**From:** Jane Partridge <[Jane.Partridge@lgnsw.org.au](mailto:Jane.Partridge@lgnsw.org.au)>  
**Sent:** Wednesday, 11 September 2019 4:41 PM  
**To:** Sandy Chappel <[Sandy.Chappel@planning.nsw.gov.au](mailto:Sandy.Chappel@planning.nsw.gov.au)>  
**Cc:** Linda Blinkhorn <[Linda.Blinkhorn@lgnsw.org.au](mailto:Linda.Blinkhorn@lgnsw.org.au)>; Vanessa Burow <[Vanessa.Burow@lgnsw.org.au](mailto:Vanessa.Burow@lgnsw.org.au)>  
**Subject:** STRA Regulatory Framework - LGNSW Preliminary Comments

Hi Sandy

Thank you for providing us with an extended timeframe for submitting feedback on the STRA Regulatory Framework. This is welcome as we are concerned that the period provided for comment has not been adequate given the scope of the package and council reporting timeframes.

Our submission will expand on the following themes:

### **Integrated Approach**

LGNSW welcomes the consultation of the entire STRA package, ie both the draft planning instruments and code of conduct, as it is important that councils have the opportunity to comprehensively view these documents together

LGNSW supports an integrated approach to STRA but considers that the planning instrument, compliance and regulation components proposed are not sufficiently linked and will present regulation issues for councils and confusion within the industry.

### **Planning Instruments**

While there is some flexibility for regional councils to nominate different day limits to no lower than 180 days, the inability to specify a number of days below 180 days does not provide sufficient flexibility to manage the impact of STRA for the different circumstances across NSW. LGNSW considers that the SEPP should allow all councils to determine the number of days



properties can be used for STRA, and that this should not be capped at 180 days, so they can balance local economic, tourism and long term housing needs.

The provision that un hosted bookings of STRA for 21 or more consecutive days not contribute to applicable day thresholds is seen as problematic. Issues include difficulties in measuring and compliance, and its potential use by landlords to avoid requirements under the Residential Tenancies Act for properties rented to longer term tenants.

Risks associated with bushfires and flooding are important considerations. In terms of practical implementation, some issues identified by our members include how the provisions will apply to properties already being used for STRA that would not comply with the proposed provisions and that in some regional areas the provisions will apply to large areas and may be too restrictive.

The SEPP excludes certain forms of dwellings from its operation, but does not exclude dwellings, such as those approved for affordable housing under the Affordable Rental Housing SEPP (2009) and SEPP No. 70 - Affordable Housing (Revised Schemes). Use of these dwellings for STRA could undermine the objectives of these policies.

STRA provisions may be used by developers of high-rise buildings to withhold dwellings from the market (but allow their use as STRA) until the warranty period for major building defects has passed.

Fire Safety Regulation - Councils are concerned about the ability to measure compliance with the provisions, particularly for dwellings currently being used for STRA and for exempt development.

## **Compliance**

The Code of Conduct and establishment of a register are supported, however there is a strong view that the register must be administered by the Department of Customer Service rather than an industry-led register as proposed.

Councils are concerned that while the framework seeks to address amenity impacts through the Code of Conduct and regulation under the *Fair Trading Act 1987*, councils will still receive and be expected to deal with complaints. Adequate resources such as websites and public information programs for participants and local communities are required. This would assist to minimise the impacts of the anticipated additional compliance load on some councils.

There is significant concern about how councils will be able to effectively manage compliance of the proposed framework and the resourcing and cost impacts. Councils consider that a state government register must include up-to-date, accurate information on bookings, property compliance, owner and host details. This should be available in real-time to councils.

A further issue of concern is the need for greater clarity about the relationship between breaches of the Code of Conduct and compliance with the SEPP.

## **Implementation, Monitoring and Review**

The property register and the Code of Conduct must be in place before the SEPP takes effect.



LGNSW considers that further work on the proposed framework is required to address the issues raised. This should be informed by further consultation with councils. When all components of the framework are in place, a review after 12 months operation is supported.

Please contact me or Linda or Vanessa if you have any questions.

Regards

Jane

JANE PARTRIDGE MPIA  
**STRATEGY MANAGER, PLANNING AND TRANSPORT**  
**LOCAL GOVERNMENT NSW**

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<http://www.mailguard.com.au/mg>

**From:** no-reply@planning.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Thursday, 22 August 2019 11:06 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category

Submitted on Thu, 22/08/2019 - 11:05

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Lili

**Last name**

Hu

**Name withheld**

No

## Info

**Email**

[lili.hu1122@gmail.com](mailto:lili.hu1122@gmail.com)

**Suburb/Town & Postcode**

2134

**Submission**

The links are suspended, I am unable to access to details. I'm expressing my 2 cents opinions base on other indirect sources, such as news articles and discussions with my agency.

1. It is great that The new legislation has included Code of conduct, that can potentially minimise adverse effect from short term leasing. However, it should also apply to long term, negative impacts do not limit to destructive behaviours from short term guests.
2. Since code of conduct is in place, I do not see the point of limiting 180 days.
3. Sydney rental market is currently over supplied, limiting 180 days are not going to boost the economy.

Thanks

**I agree to the above statement**

Yes

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This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it immediately.

Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the NSW Office of Environment and Heritage.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

**From:** Lily Seeto <ryde1410@yahoo.com>  
**Sent:** Wednesday, 11 September 2019 2:23 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

Dear NSW Government,

Regarding your current proposal of State Environmental Planning Policy, I would like to raise a few points for your attention.

I respect your intention to regulate the short-term rental market. However, I believe your upcoming proposal is too strict and is detrimental to small property owner like myself.

As a stay-at-home single mother, I have 2 children and I live mainly by the income from AirBnb short-term rental. I bought my 3 apartment properties 7 years ago and I still have 23 year of mortgage to pay off. I tried long-term rental before. However, the long-term rental price and rent-out rate in my area are not idea at all and left me a large gap between rental income and mortgage payment.

When I was introduced to short-term rental option like AirBnb, Booking and Stayz, I found a new way to support my family. I had experience in hospitality before I had children and I know very well how to manage and organize service for hotel or service like environment. I am proud to say that I have a quite successful small business in the short-term rental. I have been hosting over 200 guests in the past and most of them loved their experience in my properties. They found it this way of rental is more affordable and more flexible than the traditional commercial hotels or long-term leasing contracts. I received so much great reviews from those guests, which not only increase my income but also boost my confidence for life.

According to Butterfly effect theory, even though my business is small, it does initiate some other related business to flourish in my community, such as cleaning, plumbing, furniture, florist and ect. It is fulfilling for me to bring opportunity and make my part of contribution to my community.

To be honest, the reason I am sharing my story of short-term rental with you, is to raise your attention to reconsider your regulation proposal. I think it is too strict and not being considerable for the situations of small short-term rental business owners like myself. Even though I know I have rights to claim support from Centrelink for single parent payment to support my children and myself. I do not want to do that because I regard it undignified to the live on welfare system when in fact it could have been possible to make a living on my own.

At the contrary, I would like to pay my own share of tax; I would like to help and support other people; I would like to set a good example for my children to be a self-respect and independent human being. Please do not take away these import things in life!

Regards,  
Lily Seeto  
North Ryde  
North Ryde, Nsw 2113

**From:** Lily wang <Incwj@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:20 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because, our family is relying on the income.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Lily wang  
3 Rolla Road  
Glenfield, Nsw 2167

**From:** Lina Gomez <linar\_01@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because I have the right to use my private property to generate extra income for the always increasing bills and mortgages.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

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Thank you for reading my submission.

Regards,  
Lina Gomez  
253 Australia St  
Newtown, Nsw 2042



**From:** Lincoln otoole <lincolnotoole@icloud.com>  
**Sent:** Tuesday, 20 August 2019 1:34 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Re: Holiday rental regulations for NSW

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category, sent

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens on our operations.

As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

As holiday rentals like mine become more important to the tourism economy, it's my strong belief the NSW Government should build a regulatory solution that ensures the sector can reach its economic potential.

Thank you reading my submission.

**From:** no-reply@planning.nsw.gov.au on behalf of Department of Planning,  
Industry and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Friday, 16 August 2019 6:24 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Cc:** DPE PS ePlanning Mailbox  
**Subject:** Have your say on Short Term Rental Accommodation

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category

Submitted on Fri, 16/08/2019 - 18:23

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

linda

**Last name**

fan

**Name withheld**

No

## Info

**Email**

[fanlinda2011@yahoo.com.au](mailto:fanlinda2011@yahoo.com.au)

**Suburb/Town & Postcode**

2118

**Submission**

Dear Minister,

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As holiday rentals like mine become more important to the tourism economy, it's my strong belief the NSW Government should build a regulatory solution that ensures the sector can reach its economic potential.

Thank you reading my submission.

**I agree to the above statement**

Yes

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This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it immediately.

Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the NSW Office of Environment and Heritage.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

**From:** Linda fan <fanlinda2011@yahoo.com.au>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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Thank you for reading my submission.

Regards,  
Linda fan  
4 Woodglen Pl  
Cherrybrook, Nsw 2126

**From:** Linda Goddard <lgoddard26@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because my child has left home, I have a house and a mortgage that is too big for me alone. AIRBNB gives me an opportunity to meet new people from around the world and it assists me in paying my costs.

It is not worth an enormous amount of money but it does mean I am not in the position many women of my age are in. They are unable to pay their mortgages are thrown out of their homes and the numbers of homeless women is rising as the government would know. This is an innovative sensible idea. I do agree with the points highlighted below.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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Thank you for reading my submission.

Regards,  
Linda Goddard  
670 Sackville St  
Albury, Nsw 2640

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 8:33 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

Submitted on Wed, 11/09/2019 - 20:32

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Linda

**Last name**

Heaton

**Name withheld**

No

## Info

**Email**

[linda.heaton10@gmail.com](mailto:linda.heaton10@gmail.com)

**Suburb/Town & Postcode**

2099

**Submission**

1. Complying Development: STRA in residential strata schemes must be classed as 'complying development' with inspection by Local Council or a private certifier, not 'exempt development'. This is the only way to ensure the mandatory fire safety standards are met.



2. Day Caps: Un-hosted STRA must be capped at 60 days for the Greater Sydney Region to contain STRA to 'Home Sharing'. All STRA to count toward the cap. No exceptions.

3. Development Consent Conditions: Residential apartment buildings in mixed use and commercial zones with express prohibitions on short term letting must have their development consent conditions respected and preserved.

4. The Register: The planning law changes must not start without The Register, which must be run by Government or a neutral platform not operated or controlled by the short-term letting industry. The Register must include the days of occupation and all the platforms on which the premises is listed, Local Councils must be involved in designing the system. Local Councils and NSW Fire and Rescue must have access to the data.

5. Host Obligation: There must be an enforceable obligation for hosts to register their premises before it is listed and used for STRA purposes. This should be part of the complying development criteria, so it is clear the use of unregistered premises for STRA is illegal and penalties apply.

6. Platform Obligation: There must be a legal obligation for platforms and agents not to list any unregistered residential dwellings for STRA. International experience shows that without such an obligation, platforms will continue to list thousands of illegal apartments. Platforms must also have an obligation to share data with State and Local Government. All listings and other advertising must clearly display the host's unique ID.

7. Charges and Fees: Residential strata schemes must have clear authority to levy additional charges and fees to additional wear and tear and costs whether STRA is hosted or un-hosted.

8. Flexibility: Local Councils must have flexibility to set a lower cap and apply zoning restrictions to meet their strategic planning objectives.

**I agree to the above statement**

Yes

**From:** Linda Natascha <surryhills23@yahoo.com>  
**Sent:** Wednesday, 11 September 2019 2:23 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

I have noticed the new regulatory framework for short-term rental accommodation which is going to implement from this September. I truly understand the concern and necessity of regulating the short-term rental market, but I think this framework is excessively rigorous, and I would like to share some of my personal opinions regarding this.

I am an Airbnb host who has one investment property used for Airbnb. I recently gave birth, so I have to quit my job to look after my daughter. Thus, I'm facing lots of financial pressure. Due to the depressed real estate market in recent years, it's not easy to sell or get good rental income from long-term leasing, I start to do Airbnb for my apartment, and I found the short-term leasing income could cover my mortgage better and help me reduce financial stress. I'm trying hard to find a way to earn money independently rather than get money from Centrelink. Also, in my previous long-term rental experience, my property was damaged by tenant badly even there is 6-month inspection conducted. I found the short-term leasing could maintain my property better due to frequent check and clean.

Another advantage of short-term leasing I found is the short-term rental provides more job opportunity for housekeeping. Lots of cleaners I have cooperation are very appreciated that they can have this job to live. Most of Airbnb hosts like me have lots of love for our properties, and we try to decorate the holiday houses as a beautiful home. We hope guests will love and feel like being at home with an affordable accommodation fee. I believe that the short-term leasing is beneficial for the tourism industry, and the purchase of furniture and decoration from supermarkets and shops also benefits for the national economy. Indeed, we claim tax legally for all the income from short-term leasing.

The framework of 180days limitation will have a significant impact on my daily living and family. It is difficult to put the property on a long-term leasing market for 180 days in a year which means the rental fee cannot be satisfied, and there is more possibility to leave the property unoccupied. That will lead to much more substantial financial difficulty for me to pay my mortgage, raise my daughter and afford daily living expense (As you know, childcare and living expense are costly in Sydney). The limitation will be worse the short-term leasing market, which will lead cleaners to lose a job, decrease the number of tourists, and affect the income of shops which even will worsen the national finance. I don't think this limitation can help long-term leasing and also will exacerbate the real estate market because it's not able to get the balance for both long-term and short-term leasing in a year.

I do understand the government's concern of safety and regulation of short-term leasing market. However, I genuinely believe that this limitation is not suitable to implement, and the weakness and leading consequences are much more significant than the advantages. It will not only get thousands of families to struggle with their lives, suffering from financial difficulties but also impact on the national economic situation. I genuinely wish you could take careful consideration to determine whether this limitation of days is appropriate in deep national concern. Thank you for your attention.

Kind regards,

Linda

Regards,  
Linda Natascha  
Hill St  
Surry Hills, Nsw 2010

**From:** Linda OBRIEN <lindaobriendesigns@yahoo.com>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it means I get to supplement my income, provide a valuable service and meet new people.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

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I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

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Thank you for reading my submission.

Regards,  
Linda OBRIEN  
19 Cove Ave  
Manly, Nsw 2095

**From:** Linda O'Neill <linda.oneill2@optusnet.com.au>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it gives me employment at age 68 there are not many employment areas for me. I am working from home. I do not have to travel

The Airbnb host community depends on hosting as an economic lifeline to help us pay the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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Thank you for reading my submission.

Regards,  
Linda O'Neill  
9 Bedford Pl  
Burradoo, Nsw 2576

**From:** Linda Robertson <lindarobertson333@gmail.com>  
**Sent:** Thursday, 5 September 2019 11:39 AM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens on our operations.

As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

Kind regards,  
Linda Robertson  
P O Box 402, Kiama NSW 2533



**From:** Linds Tesoriero <lindatesoriero@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

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I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Linds Tesoriero  
36 Bedford Rd  
Woodford, Nsw 2778

**From:** Lindsay Davis <lindsay@evelind.com>  
**Sent:** Wednesday, 11 September 2019 2:20 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Lindsay Davis  
2097 The Lakes Way  
Bungwahl, Nsw 2423

**From:** Lindsay Pyne <pynewood@dodo.com.au>  
**Sent:** Wednesday, 11 September 2019 2:16 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

#### STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

#### Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Lindsay Pyne  
2214 Wollombi Rd  
Sweetmans Creek, Nsw 2325

**From:** Lis Miller <lismiller66@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:20 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it promotes local tourism and helps local economies. It does not line my pockets with as much money as you think. I still have to pay rates and taxes.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and skyrocketing Rates and land taxes.

I recommend my local cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

The Govt just want a piece of the pie and it has been shown that building regulators dont do their job properly (opal towers).

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

I do not support the government's aporoach.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Lis Miller  
27 Alternative Way  
Nimbin, Nsw 2480



**From:** Lisa Hutchinson <hutchinson357@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:22 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Lisa Hutchinson  
36 Rangers Ave  
Mosman, Nsw 2088

**From:** Lisa Mare <lisamare87@yahoo.com.au>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Lisa Mare  
79 New Line Rd  
Cherrybrook, Nsw 2126

**From:** Lisa Molloy <lisa@kjandcobrands.com>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because I believe there is a need for apartment style holiday homes on the Northern Beaches area as well as I enjoying meeting people from all of the world.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired

- Require evacuation or emergency plans and guest education

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Lisa Molloy  
21 Lakeside Cres  
North Manly, Nsw 2100

**From:** Lisa Mylchreest <lisamylchreest@mylchreest.me>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I think you should listen to us. Australia is one of the most over-governed countries in the world. A German visitor to us recently said, 'Australians have so many RULES!'

I host on Airbnb because it is another source of accommodation for people visiting Dungog, because I love showing off our town, because the people Airbnb send (due to their incredible system of cross checks) are always lovely. I recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

I can't afford to spend money following some new 'rules' that the Government thinks up. Airbnb's system is so excellent they shouldn't be necessary. I oppose the unprecedented requirements to introduce red tape. If my house is safe for me and my family to live in, it's safe for my guests. Because I already carry out the following, I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

Thank you for reading my submission.

Now it's over to you to support us, and our tourism industry.

Regards,  
Lisa Mylchreest  
PO Box 192, Dungog  
Dungog, Nsw 2420

**From:** Lisa Peterson <lisa@labodeaccommodation.com.au>  
**Sent:** Tuesday, 10 September 2019 3:57 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** recorded in DPIE subs register, recorded and not sent to DCS, Purple category

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I have a business that represents home-owners who wish to host on Airbnb. Airbnb helps these home-owners to pay the mortgage and the bills, and to share their spaces to guests so that they can become part of other communities.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share the homes of our home-owners.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education



## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Lisa Peterson  
147 Bevic Road  
Clarence Point, Tas 7270

**From:** Lisa Tippet <november123123@gmail.com>  
**Sent:** Tuesday, 10 September 2019 7:58 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** recorded in DPIE subs register, recorded and not sent to DCS

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because I enjoy providing families who are travelling affordable accommodation. Prior to Airbnb, our family of five struggled to stay anywhere in the inner cities of Australia that was affordable as hotels don't cater well to the family market. I love that now as I travel I can stay in lovely affordable homes and in turn I chose to host families.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

I am concerned about the Government's approach, and parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

I am opposed the 180 night cap in Sydney when hosts are not present. I feel there is a real lack of affordable accommodation for travelling families and the introduction of the 180 day cap will significantly reduce the number of available properties for travelling families and will only add to that shortage. If affordable housing is the issue why not introduce a 10% tax after 180 days per annum and use that money towards housing projects.

I believe the 180 day cap should not apply to buildings zoned for short term stays or buildings zoned as serviced apartments. In those buildings owners should have the right to lease out their property 365 days a year because owners invested enormous amounts of money in to those buildings with the belief that there was no limitations to their usage and imposing a 180 day cap to buildings zoned for short term stays or as serviced apartments is unjust.

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a

significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

#### Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

Thank you for reading my submission.

Regards,  
Lisa Tippet  
243 Pyrmont St  
Pyrmont, Nsw 2009

**From:** Lisa Vels <lisa\_lace@hotmail.com>  
**Sent:** Tuesday, 10 September 2019 7:54 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** recorded and not sent to DCS, recorded in DPIE subs register

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Lisa Vels  
5 Bonnor Cl  
Holt, Act 2615

**From:** Liu xu <liuxu@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

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- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
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Thank you for reading my submission.

Regards,

Liu xu

31 Meadow Cres

Meadowbank, Nsw 2114

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 4:36 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Rob submission 3.0, non Air BNB run, council submission

Submitted on Wed, 11/09/2019 - 16:36

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

**First name**

Liz

**Last name**

Rankin

**Name withheld**

No

## Info

**Email**

[elizabeth.rankin@esc.nsw.gov.au](mailto:elizabeth.rankin@esc.nsw.gov.au)

**Suburb/Town & Postcode**

Moruya

**Submission**

Short-term Rental Accommodation Submission



Eurobodalla thanks the Department of Planning, Industry and Environment for the opportunity to provide comment on the short-term rental accommodation (STRA) draft code, draft amendment regulations and STRA property register. Eurobodalla Shire Council recognizes the complexity regarding the policy review and welcomes clarity for STRA in NSW.

The following points form the basis of Eurobodallas's submission, which is currently in a draft form. We will submit a completed endorsed submission by COB Wednesday 18th September. Thank you for extending the submission time frame.

#### Key Points

- The STRA Framework and regulations should support local planning and regulatory responses which reflect the specific contexts of each community. The one size fits all approach strips away our ability to strategic plan for this important land use.
- The majority of residential zoned land in Eurobodalla is mapped bushfire prone land and a minor amount is on flood control lots, meaning that little STRA in the region will fall within the exempt or complying development criteria
- Eurobodalla supports the industry led, funded and managed property registration system and the administration and enforcement of the code of conduct.

#### **I agree to the above statement**

Yes

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 4:54 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Rob submission 3.0, non Air BNB run

Submitted on Wed, 11/09/2019 - 16:52

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

**First name**

Liza

**Last name**

Booth

**Name withheld**

No

## Info

**Email**

[liza.booth@lawsociety.com.au](mailto:liza.booth@lawsociety.com.au)

**Suburb/Town & Postcode**

Sydney 2000

**Submission file**

[letter-to-dept-of-planning,-industry-environment---short-term-rental-accommodation---a-new-regulatory-framework---11-september-2019.pdf](#)

**Submission**

Attached is submission from the Law Society of NSW.

**I agree to the above statement**

Yes

**From:** Lizette Tkalec <tklizzie@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

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## STRA Property Register

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## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Lizette Tkalec  
50 MacLeay St  
Elizabeth Bay, Nsw 2011

**From:** Loan Nguyen <innerwesthomeaway@gmail.com>  
**Sent:** Thursday, 5 September 2019 2:07 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Minister, Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry. As a result, regulation for our sector should avoid unnecessary burdens on our operations. As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

**From:** Loane Avenell <loane.avenell@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because I am on my own and the airbnb income helps me to fund my living expenses, mortgage, etc. as a female on my own in Sydney (I work in a professional role by day).

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

#### STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

#### Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

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Thank you for reading my submission.

Regards,  
Loane Avenell  
15-23A Knight St  
Erskineville, Nsw 2043



**From:** Lois Vickery-Hall <louisa59vh@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because I love sharing my hometown with visitors hosting fellow Australians looking for a local holiday. The more Australians holiday within Australia, the more money is spent supporting our local communities, giving jobs in hospitality that may otherwise not be available.

I have been hosting guests at my properties for over 10 years and I have never received a complaint regarding my guests. I educate them on all the rules and regulations that I have in place to ensure my neighbours amenities are not disturbed.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

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Specifically, I want to comment on the following:

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Lois Vickery-Hall  
37 Childe St  
Byron Bay, Nsw 2481

**From:** Lois Wolf <loiswolf961@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:22 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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Thank you for reading my submission.

Regards,  
Lois Wolf  
11 Bradley Pl  
Illawong, Nsw 2234

**From:** Loran Able <loran.able@gmail.com>  
**Sent:** Monday, 16 September 2019 5:11 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Tessa Submissions

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens on our operations.

As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

I live in Coffs Harbour and Coffs needs as many tourists/beds it can get to maintain and grow our tourism offer. Often even with hundreds of short term rental properties there are times when it is difficult to find accommodation.

Short term holiday rentals are often very affordable enabling more people to travel.

Coffs is also a retirement destination and renting out a room or part of a house gives these people in most cases a much needed boost to their income and providing them with a better living standard. Taxes are of course paid on the earning which is good for the government.

Let people get ahead in these tough economic times.

Sincerely

Loran Able

**From:** Loretta Mckee <lorettamckee@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

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Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

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Thank you for reading my submission.

Regards,  
Loretta Mckee  
Rocklands Ln  
Wollstonecraft, Nsw 2065

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Tuesday, 10 September 2019 9:25 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Tessa Submissions, recorded in DPIE subs register, Purple category

Submitted on Tue, 10/09/2019 - 09:25

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Lorraine

**Last name**

Rose

**Name withheld**

No

## Info

**Email**

[lorraine.d.rose@gmail.com](mailto:lorraine.d.rose@gmail.com)

**Suburb/Town & Postcode**

Balmain East, 2041



**Submission**

I would like to say that last year at 75 years old I retired from my work of 45 years as a clinical psychologist. I could have stayed in my home in Balmain and drawn a part-pension but I felt that if I down sized my home I would be able to self fund my retirement. I saw that as part of my contribution to my Australian society so that others who were not in my position could benefit.

I purchased my current unit with the belief that it was to be my home for the final part of my life. I carefully chose my new unit on the basis that it was quiet and well run and that has proved to be so in the main. Some short term letting, particularly in the summer months, has indicated to me the dangers that a growth in this area could have major impacts on my quality of life. This quality of life also relates to other retired individuals and couples. Increasingly it includes families that increasingly live in the complex since buying a house in the inner west is prohibitive. What I would like to convey to you is that these units are not just a money making exercise, these units comprise the 'homes' that people live in and these 'homes' require major protection by agencies like yours, not just juggling some 'need of industry'. Short term stay impacts on the quality of life of residents as people come and go at irregular hours, have no commitment to the ethos of the units, create issues of noise and disruption to recycling practices.

There is a need for a Register that is government run since we have seen over and over again (I am 75 years old) that self-regulation by the industry concerned is not adequate as it will end up being self-serving. Local councils also need to be involved and informed. You speak of the role of industry in developing and managing the regulatory system. That is not providing enough protection of our rights in our own 'homes' whether owned or rented. These protections extend to platforms.

You mention disciplinary action and strikes. Proper regulation has been so badly handled in this state that it is hard to believe that it will be effective. Words are cheap and the reality of dealing with complaints includes stress, anxiety and a capacity to deal with legalistic issues which make any contest one sided. The dice is loaded in one direction and the department should face that reality not blithely ignore it but take it into account and act accordingly.

You are dealing with the quality of people's lives and that has to hold far more value than any monetary value. Please be respectful.

Yours sincerely,  
Lorraine Rose

**I agree to the above statement**

Yes

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 9:08 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** recorded in DPIE subs register

Submitted on Wed, 11/09/2019 - 09:07

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Lorraine

**Last name**

Ward

**Name withheld**

No

## Info

**Email**

[lorbyron@bigpond.net.au](mailto:lorbyron@bigpond.net.au)

**Suburb/Town & Postcode**

2481

**Submission**

Air BnB, holiday letting is eroding the core community in Byron Bay. Long term or permanent residents are being so badly impacted by this flood of Airbnb activities. Neighbours and friends are turning on

each other as one decides to rent out a room unrestricted and no fire safety in place just for the money. Many rentals are experiencing noise levels that were never an issue before Airbnb. Imagine every few days new 'guests' all hyped up wanting to party. Many house owners who now Airbnb leave town so they themselves are not impacted! We simply must have some controls as all this leads to an unhappy and non functioning community. How sad for our kids when they have to leave their homes at school holiday times just so tourists can move in so the owners can cash up a bit. Please let's have laws and restrictions in place to save our communities!

Our families, old folk, kids and medical workers especially are suffering due to sleepless nights from unrestricted holiday makers.

Lorraine Ward Byron Bay 2482

**I agree to the above statement**

Yes

**From:** Lorri Roden <lorriroden@yahoo.com.au>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

#### STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

#### Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Lorri Roden  
36 Lyne St  
Henty, Nsw 2658

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Tuesday, 10 September 2019 3:25 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Dom submission, recorded in DPIE subs register, Purple category

Submitted on Tue, 10/09/2019 - 15:25

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Louis

**Last name**

Hunt

**Name withheld**

No

## Info

**Email**

[louisfhunt@hotmail.com](mailto:louisfhunt@hotmail.com)

**Suburb/Town & Postcode**

2481

**Submission**

Airbnb has increased in Byron Bay which has made occupancy in hotels low. Hotels cannot compete with lower nightly rates. There are owners of the airbnb that do not even live in Byron either.

**I agree to the above statement**

Yes

**From:** Louis Thorn <louisthorn@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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Thank you for reading my submission.

Regards,  
Louis Thorn  
42 Clara St  
Mayfield East, Nsw 2304

**From:** Louise jones <lou\_nic\_jo\_13@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:22 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

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Specifically, I want to comment on the following:

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Thank you for reading my submission.

Regards,  
Louise Jones  
158  
Pagewood, NSW 2035

**From:** Louise McCourt <louise.mccourt@bigpond.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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Thank you for reading my submission.

Regards,  
Louise McCourt  
75 Pacific Dr  
Port Macquarie, Nsw 2444

**From:** Louise Morgan <lem.5454@bigpond.com>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

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Thank you for reading my submission.

Regards,  
Louise Morgan  
32 Jersey Ave  
Leura, Nsw 2780

**From:** Luciana Castilhos <lcastilhos@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:21 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because I don't like to sublet for one person only (flatmate) and I don't do it very often but helps a lot to pay the rent and I like to meet new people.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

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Thank you for reading my submission.

Regards,  
Luciana Castilhos  
23 Curlewis St  
Bondi Beach, Nsw 2026

**From:** Lucinda Frizell <lu.friz@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host in Armidale, NSW, I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because of the love I have for sharing our farm with Australian and overseas tourists. Farm education is more important than ever, and it is a passion of mine to offer unique experiences for young and old alike. In addition, the diversity of this form of income to our farm business has been crucial to our survival on the land through this record-breaking drought. We couldn't survive without it.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I encourage all my guests to patronise the local cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

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Thank you for reading my submission.

Regards,  
Lucinda Frizell  
158 Wakefield Rd  
Wollomombi, Nsw 2350

**From:** Lucio Cocchietto <lucio\_cocchietto@tnt.com.au>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it support my long term self funded retirement goals. I also enjoy seeing others have a good time with there families at our property.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. We also employ the service of local cleaners, lawn, garden maintainance services and handyman from the local community. We also recommend our favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

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Thank you for reading my submission.

Regards,  
Lucio Cocchietto  
2 La Trobe Cl  
Barden Ridge, Nsw 2234

**From:** Lucio\_Cocchietto@tnt.com.au  
**Sent:** Thursday, 5 September 2019 9:54 AM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

Dear Minister,

I believe Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry. I personally employ cleaners and gardeners and maintenance services to maintain my property. As a result, regulation for our sector should avoid unnecessary burdens on our operations. As a responsible operator, I strongly support the creation of a simplified register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

Kind regards,

**Lucio Cocchietto**  
M: [+61 \(0\)417497100](tel:+610417497100)

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**From:** Lucy Arnott <lucyarnott.info@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Lucy Arnott  
664 The Pocket Rd  
The Pocket, Nsw 2483



**From:** Lucy Bloom <thelucybloom@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:20 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host, I am writing to give some personal feedback on the Government's proposed regulations to Airbnb participation.

I host on Airbnb because it is the only way I can afford to live in Sydney on a single income. I have three children to support and this is the best way to monetise my principal place of residence. I am not a big investor. Just a mum who is making the most of my home.

By hosting, I also support the local economy by recommending my favourite cafes, restaurants and shops in Coogee and beyond.

I am concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home. They will create a barrier to entry which will stop many people from making an additional income. Single mothers, especially.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however, parts of the current proposals are unfair and fall short of the Government's commitments which is very disappointing.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home.

Environmental Planning and Assessment (STRA) Regulation 2019

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission. I hope you will be supportive of the share economy and the Airbnb platform as it currently stands.

Regards,  
Lucy Bloom  
108 Brook St  
Coogee, Nsw 2034

**From:** Lucy Clarke <elclarke@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it allows me to have my pets cared for when I travel.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

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I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Lucy Clarke  
329 Pitt St  
Sydney, Nsw 2000

**From:** Lucy Salmon <currarongbeachhouse@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb a holiday house in a small town on the NSW south coast. The support this provides to the local residents who clean, maintain, and repair the property and provide local services is essential for the small town economy.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Lucy Salmon  
38 Crookhaven Parade  
Currarong, Nsw 2540

**From:** Lucy Strong <ianstrong@yahoo.com.au>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Rob submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because and enjoy hosting tourists as well as new immigrants and providing them with all the information required for a good holiday or settling into thier new City

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

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#### Code of Conduct

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Kind regards  
Lucy Strong

Regards,  
Lucy Strong  
17 Mills Pl  
Beacon Hill, Nsw 2100



**From:** Lucy Vader <lucy.vader@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Lucy Vader  
12 Shelly Beach Rd  
East Ballina, Nsw 2478

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Monday, 9 September 2019 7:53 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Tessa Submissions, recorded in DPIE subs register, Purple category

Submitted on Mon, 09/09/2019 - 19:52

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Luke

**Last name**

Scanlan

**Name withheld**

No

## Info

**Email**

[lukescanlan@hotmail.com](mailto:lukescanlan@hotmail.com)

**Suburb/Town & Postcode**

2010

**Submission**

Hi all, my strong stance is that the minimum stay in a strata block needs to be a minimum of 3 months. Short stays through Airbnb get abused by folks that just want to have parties, do drugs and make lots of noise on balconies which impacts buildings and residents all around. These folks should be staying in regulated hotel/motel accomodation.

It is also very hard for police to access floors in large blocks if the offending unit does not provide access. Not all buildings have or can afford 24 hour concierge.

**I agree to the above statement**

Yes

**From:** Luke Solly <lukeysolly@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:13 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Luke Solly  
102 Duck Creek Mountain Rd  
Alstonville, Nsw 2477

**From:** no-reply@planning.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Sunday, 25 August 2019 8:52 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category

Submitted on Sun, 25/08/2019 - 20:52

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Lutz

**Last name**

Barz

**Name withheld**

No

## Info

**Email**

[badscifi@yahoo.com.au](mailto:badscifi@yahoo.com.au)

**Suburb/Town & Postcode**

Stockton 2295

**Submission**

Dear Experts. Renting will be the future for the majority. It is a solution not a problem. I suggest social housing for all. Like in Berlin where over 80% rent. This gives more discretionary spending money to make for a more vibrant city. It eliminates the need for ridiculous mortgages. Or Singapore. It makes for better urban planning. It eliminates the need for car ownership. It will recreate neighbourhood market squares. Like in Kathmandu Nepal. These are all cities made for people not car driving suburbanites. That model is a total social failure. Ecologically aside. On ABC RN Health Report it was stated suburbanites are heavier on average by 6 kgs. So let us all live in decent socially designed cities. Saves billions wasted on city tunnels for cars which solves nothing.

**I agree to the above statement**

Yes



**From:** Lyn Brown <lbrown6@bigpond.net.au>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

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Thank you for reading my submission.

Regards,  
Lyn Brown  
42 Oxford St  
Newtown, Nsw 2042

**From:** Lyn Croker <lyne965@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it is my ONLY source of income and I don't receive government benefits. This SAVES THE COUNTRY THOUSANDS OF DOLLARS IF NOT MILLIONS.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

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## STRA Property Register

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I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

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Thank you for reading my submission.

Regards,  
Lyn Croker  
10 Lyrebird Dr  
Nowra, Nsw 2541

**From:** Lyn P <cabernet000@yahoo.com>  
**Sent:** Thursday, 5 September 2019 9:13 AM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

**Categories:** Purple category

Dear Minister, Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry. As a result, regulation for our sector should avoid unnecessary burdens on our operations. As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

**From:** Lyn Read <dread@iprimus.com.au>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

#### STRA State Environmental Planning Policy

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#### Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

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Thank you for reading my submission.

Regards,  
Lyn Read  
13 The Grove  
Austinmer, Nsw 2515

**From:** Lynda Roels <lmasonr@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I want to provide my feedback on the Government's proposed regulations.

I host on Airbnb because as a retiree I have no alternative means to increase my income by about \$2500 p.a.gross (1200net) in times of low interest rates and world economic uncertainty. My income is less than half of average weekly ordinary time earnings (AWOTE) and it is hard to maintain a home in Sydney on that amount let alone do normal things like a trip to the cinema or a meal out. I am 71, thrifty and sensible but as I get older my house gets older and so house maintenance/appliance is required and airbnb helps to defray those costs. I take a guest for about 40-50 nights p.a. at low cost to reach desired budget. As the margin is already so low then any added Red tape costs will make me question its worth. The other benefit of hosting to someone of my age is that it keeps me on my toes as it is quite demanding to service guests to guests expectations today, it also keeps my brain active re helping them with queries, sight-seeing planning for them, managing the finances etc, also the physical part of constant cleaning/washing laundry/gardening to maintain standards is far better than any gym workout to keep me active daily. Out of season I am constantly doing spring cleaning, house/garden maintenance if I want to maintain 5 star status for following season, so there are unseen benefits----better health, less drain on hospital services, no subsidies of drug scripts, no depression, less part-pension paid due to increased income and finally the incalculable---the goodwill generated for NSW by a warm welcome to Aussie/overseas guests who leave thinking it's a fantastic place due to my enthusiasm and hosting ability and who knows what that generates when they return home and talk about Sydney to their friends and family.

If I have to be subject to special regulations other than fire safety which is already met in my home for myself, I would not continue.

It is 2019 and the way business is done has changed, at 71 I have accepted airbnb, uber, online businesses run from people's homes, employees working online from home, jobs which can be done online sent off-shore for cheaper employees and it's time Government accepted this too. I pose a question to you--is there as much scrutiny of Uber drivers and their cars? I doubt it yet you allow people to put their lives in the hands of unlicensed-by-industry drivers and vehicles. Providing breakfast of regulated food supplies of bread, milk and butter for self-preparation is hardly in the same category is it?

I also recommend favourite cafes, restaurants and shops so small businesses get a boost from local tourism. I recommend public transport to city so cars not driven to city but parked at my property---every single guest has taken my recommendation even for visits to the Blue Mts. They listen to what I say as I am a local and after, always grateful they listened

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.



I understand that the Government has made commitments to support “fair short term rental accommodation (STRA) regulation that supports the sharing economy”.

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Thank you for reading my submission.

Regards,  
Lynda Roels  
16 The Promenade  
Sans Souci, Nsw 2219

**From:** Lyndall Murray <lyndallmurray@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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Thank you for reading my submission.

Regards,  
Lyndall Murray  
42 Cedar St  
Evans Head, Nsw 2473

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Tuesday, 10 September 2019 10:16 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** recorded in DPIE subs register

Submitted on Tue, 10/09/2019 - 22:15

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

**First name**

Lyndel

**Last name**

Wilson

**Name withheld**

No

## Info

**Email**

[b\\_lyndel@hotmail.com](mailto:b_lyndel@hotmail.com)

**Suburb/Town & Postcode**

Byron bay 2481

**Submission**

We have been in the accommodation industry for over 36 years in Byron Bay and we have never seen such a decline in trade as that since AirBnB/short term holiday rentals have started up and taken over

our town.

The thousands of homes that are now short term holiday rentals have killed the permanent rental market and the accommodation industry. Businesses are closing and struggling to keep open - that is a fact.

Byron Bay is the jewel in NSW crown and this policy being put forward through parliament is going to destroy the fabric of this unique and beautiful town. A 90 day cap MUST BE put in place, Council MUST BE given the power back to oversee and implement their own policies to protect our town and there needs to be a level playing field.

These holiday houses need to be made accountable, they need to be registered with the ATO, they must have to pay commercial rates, land tax, GST, DA fees etc. All the commercial rates etc that legitimate businesses are having to pay is killing them. There is no incentive to operate a business legitimately, we should all relinquish our licences and practice under these new "share economy" laws and just pay residential rates etc. which will decimate and cripple our councils funds.

Please look at other countries and cities around the world - there are precedences everywhere in controlling these matters - Japan, New York, Spain, the list goes on.

Stand up now to AirBnB before it is too late and they destroy the jewel in NSW crown forever.

**I agree to the above statement**

Yes

**From:** Lynette Vos <lynettevos1@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

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Thank you for reading my submission.

Regards,  
Lynette Vos  
12 Fitzgerald St  
Coffs Harbour, Nsw 2450



**From:** Lynn Marini <lynnm\_54@yahoo.com>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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I host on Airbnb because the additional income supplements the income I earn from my employment.

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Thank you for reading my submission.

Regards,  
Lynn Marini  
25 Addison Rd  
New Lambton, Nsw 2305

**From:** Lynn Nadjarian <vlnadj@bigpond.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

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Thank you for reading my submission.

Regards,  
Lynn Nadjarian  
52 King George Parade  
Forster, Nsw 2428

**From:** no-reply@planning.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Tuesday, 20 August 2019 1:48 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category

Submitted on Tue, 20/08/2019 - 13:48

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

M

**Last name**

Matos

**Name withheld**

No

## Info

**Email**

[marcelomsmatos@gmail.com](mailto:marcelomsmatos@gmail.com)

**Suburb/Town & Postcode**

2481

## **Submission**

As you know the Industry has come under even tighter scrutiny since the rise of Airbnb which has unfortunately brought a huge increase in un-regulated and ill-supervised Holiday Letting. A problem not only Byron Bay has faced, it's global. Cities like Madrid, London, New York's have all been addressing the issue, but unlike Byron, their economies obviously survive with or without Holiday 'House' style Accommodation (who wants 50 high-rise Hotels in Byron Bay, not us, nor the local community).

Here in Byron, Suffolk and Brunswick Heads it's complex and I can understand where some of the opposition to our Industry is coming from, certainly with more regulation and possible registration, part of the problems here could be addressed. Large numbers of Tourists vs the number of rate payers does put strain on the Council to support and even improve infrastructure and amenities. I believe, as many do, that the NSW or Federal Government's Tourism Departments should contribute to Byron Bay's economics as it IS a desired holiday destination, known globally, as is being proven by the numbers of visitors from all over the World. It has really become a 'must go' place. As John Gudgeon, Chariman of Byron Bay's HLO Inc, Byron should be a JEWEL of Australia and needs better Management / funding.

The suggestion of a CAP to the amount of days we will be permitted to rent IS ABSOLUTELY OBJECTED TO. I would think Council just want to limit days which would mean the town is dead for the low seasons - job losses, shop closures - half town closed for Winter, we do not want. It would indeed cause huge problems for sustainability for local businesses and employment, negative effect on Property incomes etc.

Visitors do contribute significantly to many facets of our economy in my eyes - all of the above, employment as a result of Tourism and STHL is also significant. Many Trades and Businesses I deal with rely, on the majority or 100% on the Holiday Letting Industry, which in turn feeds our local economy by having rate payers employed, in work and tax liable.

The commercial retail rental side of Byron Bay is quite outrageous but no-one seems to be looking at what the Real Estate Agents are doing, charging huge amounts of retail rent which in turn kills off local enterprise. This is a point that should be highlighted indeed to Government. Who is going to support the plethora of shops, restaurants and cafe's paying huge amounts of rent with over the top increases per year etc if we limit Tourism. This I don't understand.

Let's see what this 'Consultation' process can provide, but I do recommend that a greater Government Tourism contribution is required. The amount of income these 3rd party booking sites make from our Industry is huge. I think they should contribute part of their commission/booking fee income to the town, it should not just be put on 'us' or the visitors alone. Obviously in addition to this the Federal Government needs to be collecting Tax from these companies who are based off shore but reap huge amounts of income out of our Tourism industry. (Airbnb USA, HomeAway NL etc).

We have resident live in neighbours both sides of our House, who know us and our Agent well. NEVER any complaints. A licensed Agent in Management who employs many local companies and contractors to service our property.

DO NOT LET BYRON COUNCIL CAP OR RESTRICT, THE ECONOMICAL DOWN SIDE WILL BE SIGNIFICANT AND JEOPARDISE THE SURVIVAL OF BYRON BAY AND SUFFOLK PARK.

**I agree to the above statement**

Yes

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This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it immediately.

Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the NSW Office of Environment and Heritage.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

**From:** Madeleine Spinos <madeleine@madspin.com.au>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

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I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education



## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Madeleine Spinos  
16 Oceanside Pl  
Suffolk Park, Nsw 2481

**From:** Madeline Somers <somersmadeline@gmail.com>  
**Sent:** Tuesday, 10 September 2019 7:48 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** recorded and not sent to DCS, recorded in DPIE subs register

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

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I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Madeline Somers  
5/19 Neptune Street  
Coogee, Nsw 2034

**From:** Mal Jago <mal@jago.com.au>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

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## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Mal Jago  
27 Dans Ave  
Coogee, Nsw 2034

**From:** Malgorzata Wojciechowska <maggiew@faredge.com.au>  
**Sent:** Wednesday, 11 September 2019 2:20 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

Hi Alex!

Thanks for all the work you do for our community.

(You know me as Maggie via the CLOSE campaign but I am using my real name for the submission.)

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

We host a part of our home on Airbnb full-time, because the cost of living in the city is painfully high and our home is large enough to share. We would not be able to stay in our current home were it not for the Airbnb income. We declare every cent of the revenue and essentially run it as a business.

Doing this enables us to stay in Darlinghurst and send our kids to Sydney Secondary College Balmain. It also enables us to stay close to my 83 year old mother and help her stay in her home in Potts Pt.

We are fully tax compliant and spend around \$5,000 per year with local businesses on supplies, furnishings and trades people for the rental. We also recommend local businesses to our guests, including restaurants, shops, barbers, entertainment venues and other local attractions. The net income we earn, is spent, mostly in NSW on things and services which we couldn't otherwise afford. More cashflow in the economy.

Whilst I appreciate that legislation and regulation has to keep up with the technology driven changes in how people do business, I am deeply concerned that the proposed rules will make it harder and more expensive for us to share our home and will potentially mean we have to move the family out of the area which we have lived in for over 20 years and which is our home.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. An expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. Also see below re lighting etc requirements will will make getting a permit very difficult and expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to make costly alterations, such as expensive lighting/fire systems, in order to continue hosting and therefore stay in our home. Airbnb and hosts are not purporting to provide hotel standard accommodation and therefore should not be held to the same fire safety standards. I am actually offended that the government is effectively saying the systems and

standards currently in place for residents/rate/tax payers are inadequate for tourists who should be offered more protection..

It also feels like a convenient distraction from the issue of the state government not providing adequate public housing for those who have no income and can't pay market rent. Shutting down Airbnb listings like ours won't help those people. The listings will either not be available to anyone outside the family, or they will be rented out on the old-school rental market on 6-12 month leases. If the goal is to free up more mid-tier accommodation for those with incomes, will I still be required to install lighting and fire systems and evacuation diagrams? If no,t why not? It's not logical that short term renters should require different standards to those who rent for 6 or 12 months.

I am fine with guests having to acknowledge that they will be staying in someone's home (gasp!) and not a hotel, and hence different fire safety standards apply. Guests should be able to make this educated choice. Not everyone wants the hotel experience.

The other possibility is that onerous systems will push listings to platforms like Facebook where unscrupulous landlords are packing several backpackers or migrants to a room and charging a fortune, all cash based. Onerous and prohibitive regulation won't make it any harder to do this. It is more beneficial to support legal and tax compliant hosting via platforms such as Airbnb which support data sharing with governments.

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. I would like to know what benefits the registration will offer and to whom? I feel strongly that hosts should provide their TFN to Airbnb and Airbnb in turn should send an annual 'Payment Summary' to the ATO for tax compliance purposes. This would provide a level playing field and ensure that hosts are not evading taxes. Taxes which the government can spend to benefit the community. I can't see much benefit in registration with local or state government.

I would only support a simple and cheap system such as the one in Tasmania, a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekends only – and a data sharing framework.

#### Code of Conduct

I support a Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the draft Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform. This is already working really well.

In summary,

Please work with the other MPs and the community to develop fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want prohibitive home sharing rules and expensive planning requirements, and registration systems.

Thank you for reading my submission.

Maggie Wojciechowska  
Darlinghurst 2010

Regards,  
Malgorzata Wojciechowska  
451 Liverpool St  
Darlinghurst, Nsw 2010



**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Tuesday, 10 September 2019 3:17 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Dom submission, recorded in DPIE subs register, Purple category

Submitted on Tue, 10/09/2019 - 15:16

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Manuela

**Last name**

Epstein

**Name withheld**

No

## Info

**Email**

[manuelaepstein@gmail.com](mailto:manuelaepstein@gmail.com)

**Suburb/Town & Postcode**

2009

**Submission**

A strata should have the legal capacity to determine the types of letting and businesses that are permitted in their complex. In fact , a strata should be permitted to decide if any business especially one

that will impact on other residents, should be allowed. One would not expect a random business to be able to be established in a residential complex. Short term letting is a business and has substantial implications for the strata.

There are a number of issues with short term rental that do not apply to longer rental

- 1) The identity of the tenant is not known or not accessible to the strata manager and the strata manager
- 2) there are liability issues that are not covered by normal strata or landlord insurance
- 3) noise and other antisocial issues cannot be dealt with when there is a large turnover of occupants

The strata must be entitled to determine the circumstances of how its premises are used.

**I agree to the above statement**

Yes

**From:** Marc Everingham <marcaeveringham@yahoo.com.au>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

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Specifically, I want to comment on the following:

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Thank you for reading my submission.

Regards,  
Marc Everingham  
58 Basil Rd  
Nimbin, Nsw 2480

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Sunday, 8 September 2019 3:30 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** recorded in DPIE subs register, Purple category

Submitted on Sun, 08/09/2019 - 15:29

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Marc

**Last name**

Higgins

**Name withheld**

No

## Info

**Email**

[marc.w.higgins@gmail.com](mailto:marc.w.higgins@gmail.com)

**Suburb/Town & Postcode**

Alexandria 2015

**Submission**

The apartment block that I live in has short term lets, which are very noticeable. Particular call outs from the proposal is that the fines suggested are no where near high enough. The offending apartments would earn more from the rental to care about the fine. The other is that apart from the first document were does it reiterate that owners can vote ( with 75% of owners corp) to ban short stays. This needs to be much more visible to those reading through these documents. Owners should be able to determine how their block operates , not the council !!!

Its all very well, but like the other owners here we all pay strata fees, which support works including in my instance the pool and gym. These tend to be the two main areas that get packed and so even residents either do not feel safe to use them, or cannot use them do to the fact there are so many people there. You can tell a sharp difference in the cooler months when its pleasant to live here and enjoy the apartment I purchased to live in, and not buy just to rent out for short stays with no care or consideration.

**I agree to the above statement**

Yes

**From:** Marc Hine <marc\_hine@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:21 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

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Specifically, I want to comment on the following:

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Environmental Planning and Assessment (STRA) Regulation 2019

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Thank you for reading my submission.

Regards,  
Marc Hine  
46 High Holborn St  
Surry Hills, Nsw 2010



**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Tuesday, 10 September 2019 4:15 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Dom submission, recorded in DPIE subs register, Purple category

Submitted on Tue, 10/09/2019 - 16:14

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Marc

**Last name**

wilson

**Name withheld**

No

## Info

**Email**

[marcwilson64@yahoo.com](mailto:marcwilson64@yahoo.com)

**Suburb/Town & Postcode**

Byron Bay NSW 2481

**Submission**

I wish to submit my objection to the Short Term Holiday Rental policy that is currently being discussed.

As a long term resident and business owner in Byron Bay I can see the demise in our community and the obliteration of the accommodation sector.

We have been in the accommodation industry for over 36 years in Byron Bay and we have never seen such a decline in trade as that since AirBnB/short term holiday rentals have started up and taken over our town.

The thousands of homes that are now short term holiday rentals have killed the permanent rental market and the accommodation industry. Businesses are closing and struggling to keep open - that is a fact.

Byron Bay is the jewel in NSW crown and this policy being put forward through parliament is going to destroy the fabric of this unique and beautiful town. A 90 day cap MUST BE put in place, Council MUST BE given the power back to oversee and implement their own policies to protect our town and there needs to be a level playing field.

These holiday houses need to be made accountable, they need to be registered with the ATO, they must have to pay commercial rates, land tax, GST, DA fees etc. All the commercial rates etc that legitimate businesses are having to pay is killing them. There is no incentive to operate a business legitimately, we should all relinquish our licences and practice under these new "share economy" laws and just pay residential rates etc. which will decimate and cripple our councils funds.

Please look at other countries and cities around the world - there are precedences everywhere in controlling these matters - Japan, New York, Spain, the list goes on.

Stand up now to AirBnB before it is too late and they destroy the jewel in NSW crown forever.

Kind Regards,

**I agree to the above statement**

Yes

**From:** Marcia Grace <admin@tradinglounge.com>  
**Sent:** Wednesday, 11 September 2019 2:16 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Rob submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Marcia Grace  
8 Murri St  
Blackheath, Nsw 2785

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Tuesday, 10 September 2019 3:47 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Dom submission, recorded in DPIE subs register, Purple category

Submitted on Tue, 10/09/2019 - 15:47

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Marcus

**Last name**

Cole

**Name withheld**

No

## Info

**Email**

[slowburn@tpg.com.au](mailto:slowburn@tpg.com.au)

**Suburb/Town & Postcode**

Leura 2780

**Submission**

In regard to STRAs (Short-Term Rental Accommodation) properties, my major concern in the tourist area in which I live (The Blue Mountains) is the ever-increasing number of domestic properties being bought

and operated as non-host accommodation. The well-being and lifestyle of owner-occupier residents always comes a poor second to the monetary arguments of tourism operators, property developers and cashed-up investors from outside our area. We now have a major "industry" operating in residential areas. People's homes are being surrounded by money-making businesses. I am not compensated or advantaged in any way by this goldrush. Inconvenience, alienation and anxiety are my reward.

For the rate-paying residents who live permanently in this area, the increasing crush of visitors and the transformation of neighborhoods into clusters of money-making crashpads, is becoming demoralising. The character of neighbourhoods and the appearance of heritage streetscapes are being degraded for financial gain and the sense of community is lost. Government at all levels seem to feel it is only a matter of self-regulation by "the industry" - and when has that ever worked? Yes, a code of conduct and some redress measures for residents in regard to issues like noise and anti-social behaviour will supposedly guarantee harmony. A fair outcome for all. Many of us currently being subjected to the daily imposition of this tourism goldrush beg to differ. This is about a lot more than noisy strangers and parking in people's driveways.

The real issue is the fundamental, corrupting changes imposed on entire communities. Think about what is happening to major tourism sites around the world. Venice, perhaps, being the most profoundly affected and effectively trashed. In the Blue Mountains, the owner-operators of the growing number of STRAs have no real interest in this beautiful and historic area or the daily wellbeing of residents. It's all about their unfettered financial gain, not about our quality of life.

The street in which I live now has five STRAs properties, and no doubt more to come. My recommendation to the Planning Department is to put a cap on the number of properties that can be used for short term rental in any residential street based on a ratio of STRAs to owner-occupied and long-term rental dwellings. Without these necessary constraints our communities will become ghost towns and the golden goose of tourism well and truly cooked.

Thank you for considering these comments.

Sincerely, Marcus Cole.

**I agree to the above statement**

Yes

**From:** Marcus Heron <marcusheron@gmail.com>  
**Sent:** Thursday, 5 September 2019 2:35 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Minister,

I have been renting out my own home for 2/3 months a year for x10 plus years now in an effort to make ends meet and I am staggered to have met so many wonderful guests in this time who wish to experience Australia from the base comfort of a home rather than a hotel and with the support and guidance of a local helping them navigate all we have to offer as a state and City.

I personally know of hundreds of average folks within my network who have become short term rentals landlords and do so without issue. It seems abundantly clear as a responsible operator in this space that we see both sides that it is the rogue operators, those managing large scale short rentals for fast and regular gain along with irresponsible renters illegally re-renting their leased homes that are at the heart of 95% of the issues in respect to neighbourly disturbances, theft and general security.

Own homes represent by far our biggest assets and you will find that owners who manage their own homes through the various platform do so with a huge amount of diligence as well as respect for their neighbourhoods and communities.

Short-term rental accommodation is an important driver of economic growth, job creation / replacement for the NSW tourism industry and as a result, regulation for our sector should avoid unnecessary burdens on our operations. As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income that is now an essential form of income as work options become harder for those of us later in life or living as a single parent where responsibilities that makes travelling far for work impossible to manage practically.

Your sincerely

Marcus Heron  
211/66 McLachlan Avenue  
Rushcutters Bay  
Sydney NSW 2011

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Monday, 9 September 2019 4:21 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Tessa Submissions, recorded in DPIE subs register, Purple category

Submitted on Mon, 09/09/2019 - 16:21

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Markus

**Last name**

Hofer

**Name withheld**

No

## Info

**Email**

[markus@hofer.com.au](mailto:markus@hofer.com.au)

**Suburb/Town & Postcode**

Coorabell



**Submission**

I believe that Airbnb contributes greatly to the local economy by bringing more visitors to the area. Supply and demand should regulate this not regulations. From my experience long time renters are louder and more disruptive to our neighborhood. Short term renters are easier to control and are more respectful to their surroundings. There doesn't seem to be any supporting evidence that short term renters generate any more complaints.

**I agree to the above statement**

Yes

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Tuesday, 10 September 2019 8:37 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** recorded in DPIE subs register

Submitted on Tue, 10/09/2019 - 20:36

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Maree

**Last name**

Giddins

**Name withheld**

No

## Info

**Email**

[mgiddins@bigpond.com](mailto:mgiddins@bigpond.com)

**Suburb/Town & Postcode**

Leura 2780

**Submission**

I am making this submission as a home owner in a residential area and my concerns relate to non-host STRA. I support the introduction to Regulations and a Code of Conduct relating to STRA.

My first concern relates to the number of guests allowed per residence. Maximum of twelve people allowed per property in a suburban area is too many and will lead to the potential for excessive noise, parking issues and traffic issues. We have a particular situation in my area with a non-host STRA. The property was sold as a four bedroom house, with changes to the interior this property is now advertised as a five bedroom property with a studio and can therefore accommodate twelve people. Fortunately this does not happen all the time but when large numbers of people do rent the property noise has been an issue and cars parked on the footpath is a regular issue. I would like to see the number of maximum guests per property in suburban areas reduced to eight people. I also think that the property owners need to make provision for off street parking and the off street parking needs to be enforced. My second concern relates to the density of non-host STRA in any particular area. The situation in my area is that we currently have one operating STRA which advertises that it can accommodate twelve guests. Another property has very recently sold and the new owner plans to operate a non-host STRA. This is a three bedroom house and the new owner is advertising it will accommodate ten guests. There is another property in the street which is currently being renovated and the owner plans to operate a non-host STRA. I understand this is a three bedroom property. This means, by the end of this year, there will be three non-host STRA properties in a section of the street of eight houses. Which definitely has the potential for noise issues, parking issues and traffic issues. This is a quite suburban area where neighbours know each other and look out for each. It is also an area with high pedestrian traffic with people walking dogs etc. The introduction of three non-host STRA in a small area will definitely be detrimental to the street atmosphere. I would like to see our local council have the authority to (i) restrict the number of guests allowed per STRA; and (ii) restrict the number of non-host STRA allowed to operation in any particular area.

Thank you for considering my submission.

Best regards  
Maree Giddins

**I agree to the above statement**  
Yes

**From:** Marese EMANUEL <stuntmumma@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:22 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Rob submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Marese EMANUEL  
46 Stewart St  
Lennox Head, Nsw 2478

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 2:39 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** rob submission 2.0, non Air BNB run

Submitted on Wed, 11/09/2019 - 14:36

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Marg & Steve

**Last name**

Walgers

**Name withheld**

No

## Info

**Email**

[margwalgers@gmail.com](mailto:margwalgers@gmail.com)

**Suburb/Town & Postcode**

2487

**Submission file**

[str-discussion-paper.docx](#)

## Submission

With reference to the following dot point

No more than 2 persons/bedroom or 12 persons, whichever is the lesser

We feel this proposal is unfair, inequitable and discriminatory.

We have a two storey beach house in northern New South Wales with 5 spacious bedrooms which, if we adhere to the above proposal, would allow 10 guests. Our house can comfortably accommodate 13. We target our audience very carefully and find that our guests are predominately extended family groups – grandparents, children and grandchildren - gathering to enjoy an affordable, family holiday together at the beach. We do not accept bookings from those wishing to party. Our House Rules, which guests must confirm prior to our accepting their booking, have been a successful deterrent for noisy, disrespectful guests. Living in the area, keeping peace with our neighbours, is paramount.

- ♣ One of our bedrooms comfortably allows two sets of bunk beds which equates to a maximum of four for this bedroom. As a rule, these four guests are children as young as 3.
- ♣ At times we assemble a travel cot to comfortably fit in with a queen bed making three per room, mirroring the arrangement some families live with.
- ♣ In a common area we have a day bed which comfortably sleeps two children or one adult.

Possible alternatives for management of this proposal could include...

- ♣ allowing exceptions to the rule upon inspection
- ♣ considering dimensions of bedrooms

Limiting occupancy to a maximum of two per room would seriously impact families seeking an affordable, beach holiday. Families possibly would not book, stay for shorter periods or take the cheaper option of Asian or Pacific Island holidays.

Our digital guide book, sent to all guests, promotes restaurants, shopping centres, attractions and natural environments in our local area. Loss of this patronage would severely impact our local area.

We feel this proposal is unfair, inequitable and discriminatory.

Steve & Marg Walgers  
11 September, 2019

0408758587

**I agree to the above statement**

Yes

## Environmental Planning and Assessment (Short-term Rental Accommodation) Regulation 2019

The proposed SEPP will be supported by amendments to the *Environmental Planning and Assessment Regulation 2000* (the Regulation). The amendment will provide for visitor safety, by requiring dwellings used for STRA to meet new safety standards. These standards are detailed in the 'Short-term Rental Accommodation Fire Safety Standard' and summarised below. These are consistent with those that were exhibited in 2018.

**Table 2: Proposed safety requirements applying to dwellings used for STRA**

Dwelling type	Recommended standard
All dwellings	<ul style="list-style-type: none"><li>No more than 2 persons/bedroom or 12 persons, whichever is the lesser.</li><li>Installation of smoke alarms in each bedroom, and the smoke alarms are interconnected where there is more than one alarm.</li><li>Installation of a lighting system in hallways that is activated by the smoke alarm system.</li></ul>

With reference to the following dot point

***No more than 2 persons/bedroom or 12 persons, whichever is the lesser***

We feel this proposal is unfair, inequitable and discriminatory.

We have a two storey beach house in northern New South Wales with 5 spacious bedrooms which, if we adhere to the above proposal, would allow 10 guests. Our house can comfortably accommodate 13. We target our audience very carefully and find that our guests are predominately extended family groups – grandparents, children and grandchildren - gathering to enjoy an affordable, family holiday together at the beach. We do not accept bookings from those wishing to party. Our House Rules, which guests must confirm prior to our accepting their booking, have been a successful deterrent for noisy, disrespectful guests. Living in the area, keeping peace with our neighbours, is paramount.

- One of our bedrooms comfortably allows two sets of bunk beds which equates to a maximum of four for this bedroom. As a rule, these four guests are children as young as 3.
- At times we assemble a travel cot to comfortably fit in with a queen bed making three per room, mirroring the arrangement some families live with.
- In a common area we have a day bed which comfortably sleeps two children or one adult.

Possible alternatives for management of this proposal could include...

- allowing exceptions to the rule upon inspection
- considering dimensions of bedrooms

Limiting occupancy to a maximum of two per room would seriously impact families seeking an affordable, beach holiday. Families possibly would not book, stay for shorter periods or take the cheaper option of Asian or Pacific Island holidays.



## Online submission re: STR/NSW discussion paper September, 2019

Our digital guide book, sent to all guests, promotes restaurants, shopping centres, attractions and natural environments in our local area. Loss of this patronage would severely impact our local area.

We feel this proposal is unfair, inequitable and discriminatory.

Steve & Marg Walgers

11 September, 2019

**From:** Margaret Carracher <carracher@me.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because I work part time and although I only host guests a couple of times a year, it provides me with a small supplementary income which I declare in my income tax assessment.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired

- Require evacuation or emergency plans and guest education

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Margaret Carracher  
79 Bournda Park Way  
Wallagoot, Nsw 2550

**From:** Margaret Fitzgerald <mmff13@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because I'm a teacher who likes to travel and it works very well to host in the holidays while we're away.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage, superannuation and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

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Thank you for reading my submission.

Regards,  
Margaret Fitzgerald  
16 Bona Vista Ave  
Maroubra, Nsw 2035

**From:** Margaret Harvey <noshot@live.com.au>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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Specifically, I want to comment on the following:

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Thank you for reading my submission.

Regards,  
Margaret Harvey  
2 Katungal St  
Bateau Bay, Nsw 2261

**From:** Margaret Hill <maggles1948@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because Bondi is a tourist attraction and there are not enough hotels in the area to cope with the number of overseas or interstate visitors. I enjoy having visitors to stay and I am there to answer any questions about Bondi and Sydney. The laws that the Government is introducing must be fair as it will bring positive benefits to the people of NSW.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

#### STRA State Environmental Planning Policy

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Thank you for reading my submission.

Regards,  
Margaret Hill  
2 Nelson St  
Bondi Junction, Nsw 2022

**From:** Margaret Walgers <margwalgers@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:23 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

#### STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

#### Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Margaret Walgers  
10 Lagoon Rd  
Fingal Head, Nsw 2487

**From:** Margaret Waters <margaret-upsidedown@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

#### STRA State Environmental Planning Policy

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Thank you for reading my submission.

Regards,  
Margaret Waters  
32 Farrar Rd  
Killarney Vale, Nsw 2261

**From:** Project Portfolio <projectport@optusnet.com.au>  
**Sent:** Friday, 16 August 2019 5:20 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** RE: Have your say on Short Term Rental Accommodation  
**Attachments:** MH\_Comments\_STRA+Fire+Safety+Standard.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Thanks for confirming receipt, Doug

I hope you don't mind me sending through other docs direct to you. One more is attached. I'd rather send direct than have them fail an upload. You might be able to collect them and put them all together. I'm working through them at different time. Sorry!

Margot

Margot Homersham  
Secretary, Owners Corporation  
Strata Plan 666  
3/1a Bishops Avenue, Randwick NSW 2031

0402 830 872  
[projectport@optusnet.com.au](mailto:projectport@optusnet.com.au)

---

**From:** Project Portfolio <[projectport@optusnet.com.au](mailto:projectport@optusnet.com.au)>  
**Sent:** Friday, 16 August 2019 11:24 AM  
**To:** DPE PS STHL Mailbox <[STHL@planning.nsw.gov.au](mailto:STHL@planning.nsw.gov.au)>  
**Subject:** RE: Have your say on Short Term Rental Accommodation

Thanks Doug

I thought the attachment didn't upload so I'm glad of your contact. It is now attached. I assume the message went through but I'm copying it here just in case :

Comments on draft Code of Conduct for Short Term Rental Accommodation are attached. I have used the comments tool and hope they are all saved. There are 24 comments. I believe selecting "comments" on right hand side will reveal these if they do not at first show up. Please call or email me if you cannot see them . 0402830872.

I am commenting from the perspective of a strata scheme. In particular, I have in mind small schemes where STRA issues are highly noticeable. My comments, however, would equally relate to a scheme of any size if properly managed. The Code, I believe, needs to consider a fit with requirements of the Strata Schemes Management Act. I would think most STRA difficulties arise within strata buildings and I hope my perspective is useful. Sorry if comments are repetitive - I discovered things as I moved through the

code. You should be able to evaluate holistically and consider the best fit. I intend to comment on other documents, given time, and hope you can group my comments. Margot Homersham.

Margot



**From:** no-reply@planning.nsw.gov.au on behalf of Department of Planning,  
Industry and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Friday, 16 August 2019 3:37 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Cc:** DPE PS ePlanning Mailbox  
**Subject:** Have your say on Short Term Rental Accommodation

Submitted on Fri, 16/08/2019 - 03:37

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Margot

**Last name**

Homersham

**Name withheld**

No

## Info

**Email**

[projectport@optusnet.com.au](mailto:projectport@optusnet.com.au)

**Suburb/Town & Postcode**

Randwick

**Submission**

Comments on draft Code of Conduct for Short Term Rental Accommodation are attached. I have used the comments tool and hope they are all saved. There are 24 comments. I believe selecting "comments" on right hand side will reveal these if they do not at first show up. Please call or email me if you cannot see them . 0402830872.



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**I agree to the above statement**

Yes

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This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it immediately.

Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the NSW Office of Environment and Heritage.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

**From:** Margot Vincent <mvincent@netspace.net.au>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because we enjoy showing families country living. Children who live in cities have little opportunity to experience things like collecting eggs, interacting with animals, getting fruit off trees or watching the bees make honey. We provide that in the beautiful surround of the Tweed Valley.

The Airbnb host community depends on hosting as an economic lifeline to help supplement the pension. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

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I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

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- Mandate smoke alarms – either battery operated or hard-wired
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#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Margot Vincent  
3221 Kyogle Rd  
Mount Burrell, Nsw 2484

**From:** Project Portfolio <projectport@optusnet.com.au>  
**Sent:** Friday, 16 August 2019 11:24 AM  
**To:** DPE PS STHL Mailbox  
**Subject:** RE: Have your say on Short Term Rental Accommodation  
**Attachments:** MH\_Comments\_Public+Consultation+Draft+-+Code+of+Conduct+for+the+Short+term+Rental+Accommodation+Industry.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** sent, Attachment to previous sub

Thanks Doug

I thought the attachment didn't upload so I'm glad of your contact. It is now attached. I assume the message went through but I'm copying it here just in case :

Comments on draft Code of Conduct for Short Term Rental Accommodation are attached. I have used the comments tool and hope they are all saved. There are 24 comments. I believe selecting "comments" on right hand side will reveal these if they do not at first show up. Please call or email me if you cannot see them . 0402830872.

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Margot



---

**From:** Douglas Cunningham [mailto:Douglas.Cunningham@planning.nsw.gov.au] **On Behalf Of** DPE PS STHL Mailbox

**Sent:** Friday, 16 August 2019 8:31 AM  
**To:** projectport@optusnet.com.au  
**Subject:** Have your say on Short Term Rental Accommodation

Good morning Margot

Thank you for your submission on the Government's proposed draft instruments and Regulations.

Unfortunately the attachment you provided with your submission does not appear to have come through.

If you could send it to this email, ill ensure it gets submitted through with the rest of your submission.

Thanks

Doug

**Short-term Rental Accommodation (STRA) Team**

Housing Policy | Policy and Strategy

GPO Box 39, Sydney NSW 2001

E: [sth1@planning.nsw.gov.au](mailto:sth1@planning.nsw.gov.au)

W: <http://www.planning.nsw.gov.au/STHL>



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**From:** Maria Byrne <mariaagnesbyrne2@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

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I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

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## STRA Property Register

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Maria Byrne  
41 Hickory St  
Dorrigo, Nsw 2453

**From:** Maria Hanley <maria.hanley@bigpond.com>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

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Thank you for reading my submission.

Regards,  
Maria Hanley  
14 Araluen Dr  
Killcare, Nsw 2257

**From:** Maria Hunt <bodyecology@mariahunt.com.au>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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Thank you for reading my submission.

Regards,  
Maria Hunt  
P.O. Box 1962  
, Nsw 2350

**From:** Maria Linkenbagh <woodvalecooma@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:16 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because I have a lovely Cottage which has provided enjoyable holiday stays for families and other travellers for about 10 years.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism in Cooma and the Snowy Mountains.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for others to enjoy my unique property.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

My experience over 10 years indicates that any changes/regulation of my use of the property will not enhance the guest experience in any way, as I am already a responsible property owner.

Thank you for reading my submission.

Regards,  
Maria Linkenbagh  
128 Church Rd  
Cooma, Nsw 2630

**From:** Maria Nati <mariaxnati@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because I like to share my holiday homes at Lower Portland NSW and Toogoom QLD with other people for them to enjoy what the region offers. It boosts the local economy by bringing in tourism dollars as people use the nearby public facilities and shops, cafes, supermarkets etc. People also go to the local tourist attractions. In Lower Portland, people go to wineries, farm gate trails, art galleries, national parks and walks which I let them know in my Welcome Kit and also supply brochures provided by those operators. In Toogoom, people go to Hervey Bay, Fraser Island, whale watching etc. I provide information about what they can do while in the local area.

The bookings I receive enable me to maintain my properties and meet the running expenses (eg electricity, water, rates, mortgage, insurance etc).

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

#### STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

#### Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that

hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

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- Mandate smoke alarms – either battery operated or hard-wired
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Thank you for reading my submission.

Regards,  
Maria Nati  
16 De Chair Rd  
Narraweena, Nsw 2099

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 5:15 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Rob submission 3.0, non Air BNB run

Submitted on Wed, 11/09/2019 - 17:14

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Marie

**Last name**

Hayes

**Name withheld**

No

## Info

**Email**

[mariedball@yahoo.com.au](mailto:mariedball@yahoo.com.au)

**Suburb/Town & Postcode**

Byron Bay NSW Australia 2481

**Submission**

I, Marie Hayes object to The new proposed State Environmental Planning Policy (Short-term Rental Accommodation) 2019 under the Environmental Planning and Assessment Act 1979 .



The unlawful Short Term Rental Accommodation has resulted in a rapid recent change in demographics in Byron Bay resulting in increased crime, unavailability of affordable rental accommodation forcing people living on the streets, being the highest number in NSW.

In my culdesac alone abuse to home owners by short term rentals e.g. people unknown every 3 or 6 months is an ongoing concern, bicycles, lawn mowers house hold items stolen, mismanagement of parking ,rubbish ,and undue noise in a residential zone where children and workers need their sleep , Quiet enjoyment and peace of their property is a common law. It is abhorrent and pure greed that someone interstate or over seas can buy 20 houses in residential zones in Byron Bay as an investment to let out in full for short term rentals leaving them empty for 6 months of the year , no onsite management causing disruption of small town, (population 9,000) residential living, a noticeable breakdown of community values, preventing Byron Shire families and working residents of all ages to find affordable full time rental accommodation. To adhere to relevant zonning for Short term rental accommodation is the only way forward and equitable to legal Bed and Breakfast Establishments and managed services apartments by development application for residential zones. Yours sincerely Marie Hayes

**I agree to the above statement**

Yes

**From:** Marie-France Rose <mariefranceart@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

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## Code of Conduct

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Marie-France Rose  
25 Malabar Ave  
Smiths Creek, Nsw 2484

**From:** Marina Ely <me2penders2000@yahoo.com.au>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because my family and I live in a beautiful area and have extra rooms available most of the time. We enjoy sharing our space, love and resources with other people. It is an additional income for us, as a young family and my husband studying full time it is a convenient way to earn a little more. We buy all our items to support local businesses and promote the local businesses and services to our guests.

The Airbnb host community depends on hosting as an economic lifeline to help us earn more than would be possible, considering I am a stay-at-home mum and my husband studies full time, plus we are caring for my elderly father who also lives with us. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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Thank you for reading my submission.

Regards,  
Marina Ely  
44 Penders Rd  
Tanja, Nsw 2550

**From:** Marina Scozza <davidandmarina@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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Thank you for reading my submission.

Regards,  
Marina Scozza  
24 George Ave  
Bulli, Nsw 2516

**From:** Marion Barnes <randmarb1@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:20 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Rob submission, Air BNB run

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Thank you for reading my submission.

Regards,  
Marion Barnes  
13A Woodville Rd  
Moss Vale, Nsw 2577

**From:** Marion Thwaites <maz\_thwaites@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:16 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

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Thank you for reading my submission.

Regards,  
Marion Thwaites  
3-7 Glasgow St  
Suffolk Park, Nsw 2481

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 10:39 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** recorded in DPIE subs register

Submitted on Wed, 11/09/2019 - 10:38

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Marita

**Last name**

Kohl

**Name withheld**

No

## Info

**Email**

[maritak@internode.on.net](mailto:maritak@internode.on.net)

**Suburb/Town & Postcode**

Ewingsdale 2481

**Submission**

To the Department of Planning, Industry and Environment and the Department of Customer Service

My family is against allowing private homes to be let to airbnb. Our neighbourhood has already changed as a result of it. Most so-called granny flats are short term rentals, more cars parked, more people in our rural subdivision. My friends have to move out of the area because they can't afford to live here anymore, since property owners don't rent to them but to the higher paying airbnb guests. It is easy money for those who are already well endowed.

Our shire is beset with problems of homelessness and people not being able to afford the rents anymore. Also as a long term resident I object to the commercialisation of my area. If I choose to live away from the commercial areas of town I don't want it to follow me in the form of airbnb. It is not for nothing called a disruptive economy. It disrupts my way of life and the quality of life in my shire-- Byron Bay.

Below are some further points.

Regards

Marita Kohl

NSW is out of step with locations all over the world. Major towns and cities are placing restrictions on Air BnB but in NSW the state government appears to have allowed the short term letting accommodation industry to write the rules.

The new legislation places a cap on days allowed for letting, where the host is not present, of 180 days per year or 365 days in regional areas. Byron was promised a 90 day limit in the run up to the last election but it is still to be approved and Council has to prove its case as to why Byron gets special treatment before it is approved. 90 days is still 45 weekends a year and, given weekend prices, this is likely not a deterrent to making owners return houses to the permanent rental market.

Unlimited days - no caps: Also, a loophole has appeared in the proposed regulation: a booking for 21 or more consecutive days will not count towards the limit when a host is not present. So a cap is not really a cap!! This means the true extent of short-term letting can never be monitored or measured. A host could add as many 21-day letting periods as they want and it would not be counted in the annual total! The state govt is also proposing an industry-led register to keep track of all short-term lets. It is expected to record the name of the host, the property's address, the duration of each booking and whether it complied with bylaws. The industry self-regulating? Really? This takes the power away from local councils to monitor non-compliance for their residents.

It is also known that a number of NSW MPs own short term rental properties, including the Deputy Premier. Politicians with clear conflicts of interest should not be allowed to vote on this issue.

The law supports residents - NSW Land and Environment Court has analysed case law on the definitions of "residential accommodation", "residential building", "residential flat building", "domicile" and "flats", and concluded that there must be "an element of permanence or residence for a considerable time, or having the character of a person's settled or usual abode" in order to constitute "residential buildings"; relying particularly on *North Sydney Municipal Council v Sydney Serviced Apartments Pty Ltd* (1990)21 NSWLR 532 and *Derring Lane Pty Ltd v Port Phillip City Council* (No 2) (1999) 108 LGERA 129.

**I agree to the above statement**

Yes

**From:** Marita Rifai <marita.rifai@yahoo.com>  
**Sent:** Wednesday, 11 September 2019 2:22 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

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Thank you for reading my submission.

Regards,  
Marita Rifai  
1266 Kurmond Rd  
Kurmond, Nsw 2757

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Monday, 9 September 2019 10:16 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** recorded in DPIE subs register, Purple category

Submitted on Mon, 09/09/2019 - 10:16

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Mariam

**Last name**

Hashim

**Name withheld**

No

## Info

**Email**

[mariamsarah@hotmail.com](mailto:mariamsarah@hotmail.com)

**Suburb/Town & Postcode**

Bellevue Hill



**Submission**

Dear Minister,

I believe the Tourist areas in Sydney as mentioned above should be exempt from the 180 nights limit. Tourists, families and holiday makers should have available a wide range of choice accommodation to suit their budget, lifestyle and able to enjoy the local area without having to be forced into expensive hotels or the Casino in Barangaroo.

Holiday rental accommodation in the tourist districts such as Millers Point, The Rocks, Barangaroo, Pyrmont should be available year round. Home/holiday rental accommodation has become a life style choice as tourist seek unique local experiences suited to their budget rather than staying in hotels. Since Sydney has a shortage of hotels, holiday rentals provides an alternative place to stay. Not only does this provide tourists with opportunities to discover the local community the but also drive the local economy in the hospitality industry in the surrounding area.

In the case of The Rocks, Millers Point, Pyrmont there are many unique Heritage homes which tourist and families seek out especially for their historical story and value for money. Nowhere else in Sydney can you stay in Heritage accommodation with such historical significance, and by restricting the use of these properties, holiday makers will be forced into expensive hotels and Casino accommodation.

I am deeply concerned the Casino in Barangaroo hotel accommodation will dominate The Rocks and Millers Point, the Casino will be neither family or budget friendly and has no historical significance in the area.

The Rocks and Millers Point is one of Sydney's unique historical tourist hotspots, it should be open for business not just to the big operators but to all. Holiday accommodation is a vital part of this community and should not be restricted to 180 days.

Thank you.  
Mariam Hashim

**I agree to the above statement**

Yes

**From:** Mark Amadio <markamadio84@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:20 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

#### STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

#### Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Mark Amadio  
33 Kunama Dr  
East Jindabyne, Nsw 2627

As a landlord and participant in the Short-Term Rental Accommodation (STRA) Industry I wanted to provide my feedback on the Government's proposed regulations.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home and support my local community. I understand that the Government has made commitments to support "fair short-term rental accommodation (STRA) regulation" and that the review of the Industry is in responses to the negative impact on community's amenity, namely party houses.

Short-Term Rental Accommodation is an important Australian holiday tradition embedded into the fabric of the Australian culture and is at risk because of the abuse of a few who negatively impact neighbourhood and community amenity such as Guests holding anti-social events like 'Party Houses' and as a result of platforms that promote features like 'Instant Book' which assists bookings for 'Party Houses'.

I ask that the Government be mindful that Platforms have created features like 'Instant Book' with no consequence, Guest's have used 'Instant book' for anti-social behaviour such as hosting a party, hens or buck event suffers no consequence (as they change email address or other identify obfuscation to avoid identify detection) however this burden becomes the property owner and letting agent's responsibility. There must be fair and equitable responsibility and consequences suffered by all parties including Platform and Guest.

The STRA Industry is a significant contributor to the NSW economy and helps home-owners to pay the mortgage and bills, to share their spaces with guests so that they can enjoy and participate with other communities and importantly is a recognised financial driver of regional areas where Tourism dollars are spread throughout the local community such as the local butcher, local café, local tourist attraction and the fishmonger. Over regulation and mis-appropriating responsibility and limiting consequences on Guests and Platforms puts this economic driver at risk. The draft Code and STRA Regulation unfairly places considerable burden on the letting manager and property owner.

Generally, I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

### **1) STRA Planning Policy Instruments**

a) I strongly oppose the exemption of properties where a host is present.

i. Firstly there is no way to monitor and manage this process and confirm that there is a host present which will result in the creation of a loop hole.

ii. By expressly exempting these properties the government is not addressing the scope that the STRA Review sought to review and address namely concerns about the housing affordability, availability and the impact on amenity. If there is to be credibility and fairness then all elements with potential to impact the housing affordability, availability and the impact on amenity by the STRA Industry needs to be included.

b) I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. This is a significant barrier to home sharing who share their home for a few months (cumulative) a year and will make hosting uneconomical which will end up making holidays across NSW more expensive.

c) We are opposed to the potential of day limits in regional areas as determined by local council. Day caps for holiday rentals not only put the economic uplift associated with the tourism sector at risk, but also fails to address the the most consistently cited concern about the industry, namely the impact on amenity.

d) The proposed 21-day cap is limiting and not reflective of the mobile workforce. It is only in rare cases where an employer can afford a consecutive 21 day booking for accommodation to carry out work. Typically, it is Monday to Friday (5 days) and occurring in several blocks. We recommended that accumulative bookings from the same company is the best measure and is managed by Company name and or Guest name.

There are very few guests who have the means to rent STRA for a period of five days several times a year. Typically this represents a corporate/work booking.

e) We do not support limiting the number of guests allowed in a bedroom in its current form. This proposal is particularly problematic for people with close supervision needs, for example babies who sleep in cots, very young children who still sleep with their parents and people with special needs.

We argue for the current short-term rental code, which has worked well for eight years, to prevail on this matter. The current rules allow for two adults per bedroom, plus two for the household i.e. a two-bedroom property is allowed six people.

For properties that are specifically designed to cater for larger groups than what the above rule would allow, we believe that owners should have the power to apply to their local council for development approval to use their property as a short-term rental and cater a higher number of guests.

f) Options need to be provided to the Host/Letting agent to enforce code and/or terminate the occupation of a guest where a code violation is occurring. An example is where community amenity is being negatively impacted such as a party event is occurring the Letting agent needs authority to protect the amenity and terminate violation in the form of a legal and immediate eviction where the financial loss is borne by the Guest in the form of loss of occupation and associated rent paid and the cost of carrying out such a termination.

g) We support a regulatory approach that provides the best balance for consumer safety, community amenity and the contribution of the sector to the economy. For the NSW approach to work properly, it must treat all properties equally - whether hosted or un-hosted, primary or secondary.

h) We believe that 'Terms of Use' and associated agreements used by all participant, including but not limited to; Terms and Conditions, License to occupy, STRA Agreement etc should specifically discourage party houses including the use for bucks, hens events. The strict prohibition of the use of the premise by a Guest for the purpose of holding a party, hens or bucks events should be codified.

It is our recommendation that platforms (as primary booking agent) should be mandated to ensure this is communicated to each guest and that each guest is required to agree and accept this prior to making a booking and when creating an account.

When a guest is found to have contravened this an automatic strike is recorded.

i) Concerning Jurisdiction. Consumer complaints are currently dealt with under the NSW Civil and Administrative Tribunal (NCAT) along with any residential tenancy issues. The establishment of the STRA complaint process sits outside existing established processes

meaning that a complaint (matter) could potentially be lodged both with NCAT and the STRA Commissioner regarding the same matter and although within the purview of the same responsible office (Commissioner of Fair Trading) different processes and approaches can be applied. It is our recommendation that 'double jeopardy' can occur and can be avoided where the STRA Complaints process is recognised as sole avenue.

j) Whilst there is a definition of Guest given, it needs to include all guests staying at the property despite not being listed as the guest who made the booking and all guests details should be captured during the booking process to avoid violation avoidance.

## **2) Environmental Planning and Assessment (STRA) Regulation 2019**

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests.

However I recognise the importance of consumer safety and I support the NSW Government streamlining safety regulations which:

- i. Respect the ancillary use of my home for home sharing
- ii. Mandate smoke alarms – either battery operated or hard-wired

## **3) STRA Property Register**

**Registration of all holiday rentals** – We are supportive of compulsory and simple registration for all properties listed on a short-term rental accommodation platform. When implemented correctly in other parts of the world, the registration of holiday rentals has proven to be a low-cost and effective way of informing the development of sensible rules for our growing sector.

In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. We would agree to a no cost registration and licensing system.

**Code of Conduct** – the core elements that the regulations and code is seeking to address is; housing affordability, availability and the impact on amenity. With specific regards to impact

on amenity it is the abuse of the STRA Industry by guests who hold parties, hens and bucks events that negatively impact on communities.

It is our view that booking platforms that provide features such as true 'Instant Book' enables a culture of guest abuse as these features are for the direct financial benefit of the Platform but remove all interaction with the guest from the host and Industry participant as the booking is completed within the booking Platform and the Host/letting agent/industry participant has no recourse to qualify or vet the guest as all Guest details and communication with Guest is controlled by the Booking platform in a 'Closed Loop Communication' process.

These features are in-fact mandated by Platforms and Letting Agents are penalised by the Platform if they a) do not accept this booking type b) do not accept this type of booking by negatively weighted listing results. A host/ Industry participant that offers and accepts true 'Instant Booking' is given a higher favourable weighting listing result by Platforms in how the booking platform algorithmically represents its search engine results.

True Instant booking occurs via both Airbnb and Booking.com, they are the offending platforms. Stayz/Homeaway offer "Instant Booking" which is in-fact an instant reservation where the host/letting agent/industry participant still has full access to Guest information, ability to communicate with guest to vet and qualify and is not penalised (yet) for not offering or accepting "Instant Booking" requests.

On this basis we believe true 'Instant Book' features should not be available within any Platform and should be mandated by the STRA Code and Regulation.

**Industry participants Obligations** - I support the Code of Conduct which overall is reasonable and representative of the home sharing community and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to require all letting activities to be conducted only by Licensed Real estate agents and that the use of independently audited Trust Accounts be mandatory to ensure protections for guests, host's and landlords is preserved. This provides consumer protections that are already well established and accepted and extends safe guards such as financial management through the use of Trust Accounts, professional insurance such as Professional Indemnity for Real Estate and a well established and robust regulatory framework.

**Guest Definition** – A guest booking is typically made in one name only, yet a premise may sleep more than one person. The overwhelming majority of STRA premises sleep greater than one person though only one person, the primary Guest details are captured.



It is our belief and recommendation that all persons staying at the property are required to provide adequate identification at time of booking & managed by the Platform to satisfy the Registry to avoid:

- Identity Obfuscation and
- Rorting of the strike/exclusion registry.

When a member of a group booking e.g Primary Guest is found to have violated the Code they can simple either obfuscate their name OR ask another member of the group booking to make a different booking in their name to avoid detection. This way all members of the group booking who participated in the violation are not being held accountable for their actions

**Code Definition** – The Government via the STRA Code of Conduct and Regulation seeks to address the community and neighbourhood amenity however definitions of community and neighbourhood amenity need to be established. What is considered and defined as reduced community amenity, is it a Party, hence of bucks event?

We strongly believe that a events such as party, hence of bucks need to be defined as inappropriate and included as prohibited events within the Code and that all parties that participate, arrange, hold and or market such events should be held accountable

**Complaint registration** – We believe that the cost of lodging a complaint by all parties to be set at \$150 or half the maximum actual fee of providing the service as determined by the Commissioner or whatever is the lessor. This financial hurdle is to discourage frivolous and vexatious complaints.

**Strikes** – The proposed ‘two strikes within two years’ for both Guest and host/letting agent/industry participant is unfair and burdensome and clearly weighted in the favour of the Guest. A guest typically books short term holiday accommodation only once per annum however a host/letting agent/industry participant facilitates a multiplier of 700X. That is, a typical host/letting agent/industry participant facilitates approx. 700 – 1100 guest bookings per annum and therefore the applied percentage exposure to one (1) strike pa is greater than that of a Guest.

Therefore, it our recommendation that the limit should be:

- Guest - two strikes within two years.
- Host/letting agent/industry participant - five strikes within two years.

When a complaint is upheld and the source of the guest booking is found to be a certain platform in five (5) or more occasions within a one year period the platform is penalised by \$100,000 each instance commencing five and more. Up until ten instances within a one year period and then the platform is added to the exclusion register for five year period.

**Strikes, nature of complaint** – The proposal for a complaint to be valid because of ‘misrepresentation of the state of the STRA premise’ is vague and open to abuse. Within the current Real estate regulation there exist definition and example of how this is treated for residential properties and we believe these should be adopted as they are already industry wide accepted with an established regulatory framework.

Additionally we believe that a complaint should be found valid and a strike recorded when the published, communicated and accepted Terms and Conditions of the letting have been accepted by a Guest and not followed. With special attention to where and when instances of parties, hens and bucks events have been expressly banned by the host/letting agent/industry participant are found to occur as the host has contravened the accepted Terms and Conditions.

**Complaints** – The current proposal of registering a complaint is open to abuse by serial complainants as there is no recourse of consequence for a person who acts vexatiously or mischievous intent to frustrate the normal operations of a small business.

We propose that when two complaints within a two-year period are found not to be upheld by the commissioner then the complainant should be treated and recorded as vexatious and not to be relied upon.

**Supporting Evidence** – to avoid vexatious and unsubstantiated complaints it is our submission that each complaint:

a) Must be accompanied by supporting evidence including but not limited to:

- Was the defendant informed of the code violation,
- Was the defendant given opportunity to resolve the matter,
- Documentary evidence, photos, videos, Statutory Declaration, security company report, police and or council ranger report

*In the instance where a community amenity is being negatively impacted on such as a party event is occurring (existing draft code unfairly and solely holds letting agent/property owner responsible)*

b) The Burden of Proof needs to be on the complainant

**Exclusion Register** – The burden of being registered on the exclusion registry exempts Platforms from consequence and unfairly lays responsibility directly at the feet of those with lack of resources to argument their case. Currently there exists no provision for Platforms to be subject to complaint, review and added to the Exclusion Register, there needs to be.

There must be consequences for Platforms and we propose that if complaints are upheld and are to be found to have occurred via the use of a certain platform then that platform needs to be held account able.

We suggest that in the instance of ten (10) complaints are valid and upheld by the commissioner within a one year period than the Platform shall be equally listed on the registry and equally not permitted to participate within the STRA industry for five years.

**Exclusion Register** – Fees and cost recovery should be recovered by all participants including guests and should be self-funded by way of penalties and fines incurred by Industry participants. This avoids any revenue raised via penalties not being rolled up into general consolidated revenue by Government but go directly to the area of industry (Tourism) that needs support.

Additionally, the mechanisms for costs recovery by appropriation according to; number of premises, number of days, STRA revenue and upheld complaints does not apply a provision for Platforms.

Platforms generate hundreds of Millions of dollars each year within NSW STRA Industry and should a) pay proportionately and b) should face consequences and penalties proportionate to their revenue and market dominance.

**Penalties** - When guests are found to be in violation of Code and penalties are applied they need to be applied to all parties who were present during the occupation. The current proposed amount should apply to each Guest equally. Penalties need to be applied to all guests who stayed at the property during the instance of violation and not solely borne by the guest who made the booking.

This financial deterrent will assist in meeting the aims of the Regulation and Code namely reducing the negative community impact on neighbour amenity.

**Register Data Collection and Management** - How will data be recoded and stored? What type of data will be captured and used to identify participants?

### **Classes of Industry Participant –**

Please include ChaMello Pty Ltd operating as Emerald + Aqua (ABN: 47602 114 643). Emerald + Aqua operates similarly to organisations listed in the code such as MadeComfy, Hey Tom and AirSorted.

### **Property & Complaint Register**

It is our view that Platforms need to automatically check each guest before taking a booking against the register.

To avoid guest identity obfuscation a minimum:

- Full name
- Driver license details
- Full address
- Email address
- Mobile phone number and
- Date of Birth

is provided as mandatory.

The reason for all of these details is it is very easy to change an email address, insert a middle name or initial to avoid identity matching. Additionally, this will also removed the risk of incorrectly identifying the wrong Sarah Jane or Robert Smith.

**STRA Regulatory and Code Commencement** – The changes proposed are significant and costly, they represent complex adjustment just as the national economy is poised for a recession.

Typically the height of business activity for the STRA Industry commences from the October long weekend through mid-March we recommend that any commencement begin after that

period. The ideal period is after the Financial year has concluded so therefore beginning of September.

Both the Government and STRA industry need considerable time to design and implement education and awareness initiatives with several audiences:

- General Publish – Guests
- Letting Agents
- Hosts
- Property Owners
- Industry participants, and
- Platforms

Regarding the changes. Furthermore, those carrying the burden of the proposed changes, the Property Owners and Letting Agents need time to finance and organise the complex compliance.

Furthermore micro and small businesses, the backbone to the NSW economy that act as Letting Agents need to finance and support the training of staff, update websites, legal agreements, systems and processes need to be reviewed and updated to reflect the changes and new obligations of parties. This is not insignificant and for micro and small businesses represents a significant financial hardship.

Given these factors we believe a staged approach that provides time for necessary changes to occur and for the phasing in of different components being:

- 1) Stage 1 September 2021 Register Commences
- 2) Stage 2 September 2022 Code of Conduct Commences
- 3) Stage 3 September 2023 Review of Regulation and Code commences
- 4) Stage 4 May 2024 Review of Regulation and Code complete
- 5) Stage 5 July 2024 Review of Regulation and Code findings released
- 6) Stage 6 September 2024 Review of Regulation and Code findings adopted

This phased in approach also neatly address how to apply changes to future accommodation that is booked prior to commencement. Typically accommodation is booked up to 18 months in advance, there can not be two systems/two processes and or two different legal treatment applied to bookings based on Commencement date. A timely staged approach ensures that there is the right approach for all booring situations.

**Scope and Administration of Review-** how will the social and environment impact be measured? Will the economic benefits/impact be equally measured to quantitate disruption to the NSW economy and regional economies?

Who, where and how will the review take place? How will public comment be sought and how long will the review process take place? How will the success be measured?

As the NSW Government considers how people travel and use their homes today we respectfully submit that we don't need severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

It is the technology that the Platforms provides like 'Instant Book' that is abused by guest's to avoid vetting and qualification by letting agents and it is the Guests wilful anti-social behaviour that goes with limited scope of consequence. These two behaviours by the Platform and Guest is unfairly carried by the letting agent and property owner. We submit that it is these two participants (Platforms and Guests) where greater scrutiny and control should be applied.

Our communities rarely had these issues before Airbnb and Booking.com came to our shores.

Thank you for considering my submission.

Kind Regards,

**From:** Mark Duguid <markduguid11@bigpond.com>  
**Sent:** Saturday, 7 September 2019 8:33 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW  
**Attachments:** STRA Code of Conduct Submission.pdf

Mark Duguid

22 Alanson Avenue  
Bulli  
NSW  
2516

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens and that all parties, specifically Platforms and Guests should be held to account for their actions and that the burden should not just be overwhelmingly borne by Letting agents and property owners as is the current proposal.

Please find attached my Submission,

Kind regards,

As a landlord and participant in the Short-Term Rental Accommodation (STRA) Industry I wanted to provide my feedback on the Government's proposed regulations.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home and support my local community. I understand that the Government has made commitments to support "fair short-term rental accommodation (STRA) regulation" and that the review of the Industry is in responses to the negative impact on community's amenity, namely party houses.

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I ask that the Government be mindful that Platforms have created features like 'Instant Book' with no consequence, Guest's have used 'Instant book' for anti-social behaviour such as hosting a party, hens or buck event suffers no consequence (as they change email address or other identify obfuscation to avoid identify detection) however this burden becomes the property owner and letting agent's responsibility. There must be fair and equitable responsibility and consequences suffered by all parties including Platform and Guest.

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- Identity Obfuscation and
- Rorting of the strike/exclusion registry.

When a member of a group booking e.g Primary Guest is found to have violated the Code they can simple either obfuscate their name OR ask another member of the group booking to make a different booking in their name to avoid detection. This way all members of the group booking who participated in the violation are not being held accountable for their actions

**Code Definition** – The Government via the STRA Code of Conduct and Regulation seeks to address the community and neighbourhood amenity however definitions of community and neighbourhood amenity need to be established. What is considered and defined as reduced community amenity, is it a Party, hence of bucks event?

We strongly believe that a events such as party, hence of bucks need to be defined as inappropriate and included as prohibited events within the Code and that all parties that participate, arrange, hold and or market such events should be held accountable

**Complaint registration** – We believe that the cost of lodging a complaint by all parties to be set at \$150 or half the maximum actual fee of providing the service as determined by the Commissioner or whatever is the lessor. This financial hurdle is to discourage frivolous and vexatious complaints.

**Strikes** – The proposed ‘two strikes within two years’ for both Guest and host/letting agent/industry participant is unfair and burdensome and clearly weighted in the favour of the Guest. A guest typically books short term holiday accommodation only once per annum however a host/letting agent/industry participant facilitates a multiplier of 700X. That is, a typical host/letting agent/industry participant facilitates approx. 700 – 1100 guest bookings per annum and therefore the applied percentage exposure to one (1) strike pa is greater than that of a Guest.

Therefore, it our recommendation that the limit should be:

- Guest - two strikes within two years.
- Host/letting agent/industry participant - five strikes within two years.

When a complaint is upheld and the source of the guest booking is found to be a certain platform in five (5) or more occasions within a one year period the platform is penalised by \$100,000 each instance commencing five and more. Up until ten instances within a one year period and then the platform is added to the exclusion register for five year period.

**Strikes, nature of complaint** – The proposal for a complaint to be valid because of ‘misrepresentation of the state of the STRA premise’ is vague and open to abuse. Within the current Real estate regulation there exist definition and example of how this is treated for residential properties and we believe these should be adopted as they are already industry wide accepted with an established regulatory framework.

Additionally we believe that a complaint should be found valid and a strike recorded when the published, communicated and accepted Terms and Conditions of the letting have been accepted by a Guest and not followed. With special attention to where and when instances of parties, hens and bucks events have been expressly banned by the host/letting agent/industry participant are found to occur as the host has contravened the accepted Terms and Conditions.

**Complaints** – The current proposal of registering a complaint is open to abuse by serial complainants as there is no recourse of consequence for a person who acts vexatiously or mischievous intent to frustrate the normal operations of a small business.

We propose that when two complaints within a two-year period are found not to be upheld by the commissioner then the complainant should be treated and recorded as vexatious and not to be relied upon.

**Supporting Evidence** – to avoid vexatious and unsubstantiated complaints it is our submission that each complaint:

a) Must be accompanied by supporting evidence including but not limited to:

- Was the defendant informed of the code violation,
- Was the defendant given opportunity to resolve the matter,
- Documentary evidence, photos, videos, Statutory Declaration, security company report, police and or council ranger report

*In the instance where a community amenity is being negatively impacted on such as a party event is occurring (existing draft code unfairly and solely holds letting agent/property owner responsible)*

b) The Burden of Proof needs to be on the complainant

**Exclusion Register** – The burden of being registered on the exclusion registry exempts Platforms from consequence and unfairly lays responsibility directly at the feet of those with lack of resources to argument their case. Currently there exists no provision for Platforms to be subject to complaint, review and added to the Exclusion Register, there needs to be.

There must be consequences for Platforms and we propose that if complaints are upheld and are to be found to have occurred via the use of a certain platform then that platform needs to be held account able.

We suggest that in the instance of ten (10) complaints are valid and upheld by the commissioner within a one year period than the Platform shall be equally listed on the registry and equally not permitted to participate within the STRA industry for five years.

**Exclusion Register** – Fees and cost recovery should be recovered by all participants including guests and should be self-funded by way of penalties and fines incurred by Industry participants. This avoids any revenue raised via penalties not being rolled up into general consolidated revenue by Government but go directly to the area of industry (Tourism) that needs support.

Additionally, the mechanisms for costs recovery by appropriation according to; number of premises, number of days, STRA revenue and upheld complaints does not apply a provision for Platforms.

Platforms generate hundreds of Millions of dollars each year within NSW STRA Industry and should a) pay proportionately and b) should face consequences and penalties proportionate to their revenue and market dominance.

**Penalties** - When guests are found to be in violation of Code and penalties are applied they need to be applied to all parties who were present during the occupation. The current proposed amount should apply to each Guest equally. Penalties need to be applied to all guests who stayed at the property during the instance of violation and not solely borne by the guest who made the booking.

This financial deterrent will assist in meeting the aims of the Regulation and Code namely reducing the negative community impact on neighbour amenity.

**Register Data Collection and Management** - How will data be recoded and stored? What type of data will be captured and used to identify participants?

### **Classes of Industry Participant –**

Please include ChaMello Pty Ltd operating as Emerald + Aqua (ABN: 47602 114 643). Emerald + Aqua operates similarly to organisations listed in the code such as MadeComfy, Hey Tom and AirSorted.

### **Property & Complaint Register**

It is our view that Platforms need to automatically check each guest before taking a booking against the register.

To avoid guest identity obfuscation a minimum:

- Full name
- Driver license details
- Full address
- Email address
- Mobile phone number and
- Date of Birth

is provided as mandatory.

The reason for all of these details is it is very easy to change an email address, insert a middle name or initial to avoid identity matching. Additionally, this will also removed the risk of incorrectly identifying the wrong Sarah Jane or Robert Smith.

**STRA Regulatory and Code Commencement** – The changes proposed are significant and costly, they represent complex adjustment just as the national economy is poised for a recession.

Typically the height of business activity for the STRA Industry commences from the October long weekend through mid-March we recommend that any commencement begin after that



period. The ideal period is after the Financial year has concluded so therefore beginning of September.

Both the Government and STRA industry need considerable time to design and implement education and awareness initiatives with several audiences:

- General Publish – Guests
- Letting Agents
- Hosts
- Property Owners
- Industry participants, and
- Platforms

Regarding the changes. Furthermore, those carrying the burden of the proposed changes, the Property Owners and Letting Agents need time to finance and organise the complex compliance.

Furthermore micro and small businesses, the backbone to the NSW economy that act as Letting Agents need to finance and support the training of staff, update websites, legal agreements, systems and processes need to be reviewed and updated to reflect the changes and new obligations of parties. This is not insignificant and for micro and small businesses represents a significant financial hardship.

Given these factors we believe a staged approach that provides time for necessary changes to occur and for the phasing in of different components being:

- 1) Stage 1 September 2021 Register Commences
- 2) Stage 2 September 2022 Code of Conduct Commences
- 3) Stage 3 September 2023 Review of Regulation and Code commences
- 4) Stage 4 May 2024 Review of Regulation and Code complete
- 5) Stage 5 July 2024 Review of Regulation and Code findings released
- 6) Stage 6 September 2024 Review of Regulation and Code findings adopted

This phased in approach also neatly address how to apply changes to future accommodation that is booked prior to commencement. Typically accommodation is booked up to 18 months in advance, there can not be two systems/two processes and or two different legal treatment applied to bookings based on Commencement date. A timely staged approach ensures that there is the right approach for all booring situations.

**Scope and Administration of Review-** how will the social and environment impact be measured? Will the economic benefits/impact be equally measured to quantitate disruption to the NSW economy and regional economies?

Who, where and how will the review take place? How will public comment be sought and how long will the review process take place? How will the success be measured?

As the NSW Government considers how people travel and use their homes today we respectfully submit that we don't need severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

It is the technology that the Platforms provides like 'Instant Book' that is abused by guest's to avoid vetting and qualification by letting agents and it is the Guests wilful anti-social behaviour that goes with limited scope of consequence. These two behaviours by the Platform and Guest is unfairly carried by the letting agent and property owner. We submit that it is these two participants (Platforms and Guests) where greater scrutiny and control should be applied.

Our communities rarely had these issues before Airbnb and Booking.com came to our shores.

Thank you for considering my submission.

Kind Regards,

**From:** Mark Duguid <markduguid11@bigpond.com>  
**Sent:** Saturday, 7 September 2019 8:33 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW  
**Attachments:** STRA Code of Conduct Submission.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** recorded in DPIE subs register, recorded and not sent to DCS, Purple category

Mark Duguid

22 Alanson Avenue  
Bulli  
NSW  
2516

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens and that all parties, specifically Platforms and Guests should be held to account for their actions and that the burden should not just be overwhelmingly borne by Letting agents and property owners as is the current proposal.

Please find attached my Submission,

Kind regards,

**From:** no-reply@planning.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Tuesday, 27 August 2019 9:27 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category

Submitted on Tue, 27/08/2019 - 09:26

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Mark

**Last name**

Grunwald

**Name withheld**

No

## Info

**Email**

[almark@powerup.com.au](mailto:almark@powerup.com.au)

**Suburb/Town & Postcode**

CASUARINA

**Submission**

Hi, I was under the impression that the purpose of any regulation on STHL was to do with "Resident Amenity"? Noise, parking, security, bond etc. It was NOT to do with draconian compliance that in many cases is impossible to retro fit. And if possible is cost prohibitive. STHL in the Tweed is estimated to account for some \$500M. it supports cleaners, laundries, cafes, handymen, trades etc. It brings wealth to the region that would otherwise not be there. Your draft document will drastically effect all country and beachfront homes through the over zealous flood and bush fire regulations require. None of these regulations apply to a standard lease and have no place in STHL.

The draft document on Fire and Flood compliance is totally unrealistic when it comes to existing dwellings. its just not possible in many cases and cost prohibitive in others. Owners that wish to rent their premises for a short period of time (say a few weeks over Xmas etc) should NOT have to be prohibited from doing this because of over zealous government compliance. I suggest;

- 1) All residents must comply with the original conditions of their building approval as it stood at the time. This is the same if we rented our homes under a standard residential lease.
- 2) Compliance should be changed to 2 categories; NEW BUILD and EXISTING DWELLINGS.
- 3) The real issue is community behaviour and security.
- 4) Councils will NOT want to enforce or police this compliance. Its virtually impossible and would take enormous manpower that will become an additional cost to all residents.

In summary, the compliance should be either removed or only apply to new builds. The emphasis of the legislation should not take money out of these tourist regions but encourage more by ensuring community acceptance through behavioral change.

**I agree to the above statement**

Yes

**From:** no-reply@planning.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Wednesday, 21 August 2019 6:13 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category

Submitted on Wed, 21/08/2019 - 18:13

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Mark

**Last name**

Hanna

**Name withheld**

No

## Info

**Email**

[markhanna1@live.com.au](mailto:markhanna1@live.com.au)

**Suburb/Town & Postcode**

2207

**Submission**

I have owned and been involved in residential Strata since January 1979 and have watched it deteriorate year on year.

Please don't make it worse by facilitating short term rentals. These should be restricted to hotels, motels, back packing establishments and self serviced, non Strata apartments etc.

If Strata living is to ever improve, we need responsible, long term, caring residents. Not short term rentals.

**I agree to the above statement**

Yes

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This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it immediately.

Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the NSW Office of Environment and Heritage.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Monday, 9 September 2019 5:25 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Tessa Submissions, recorded in DPIE subs register, Purple category

Submitted on Mon, 09/09/2019 - 17:25

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

**First name**

Mark

**Last name**

Hellier

**Name withheld**

No

## Info

**Email**

[mark@lakeshores.com](mailto:mark@lakeshores.com)

**Suburb/Town & Postcode**

Belmont South Lake Macquarie 2280



## **Submission**

Consistency.

There is nothing consistent about the framework.

Why has the Exempt Development Status been applied to a very limited number of councils, provided different annual caps for STRA stays of 180 days and with some councils wanting DA approvals. It should be the same state framework which applies to everyone.

Lake Macquarie City Council, which is one of these Councils, passed this requirement without any consultation with the Industry and against the recommendation of its own Council Officers.

Lake Macquarie Council has had very few problems with STRAs. There are no major Hotels in its zone, one aging Resort and it operates most of the Tourist parks in the area which are in competition with STRAs. This is tantamount to unfair trade practices and a restriction of trade.

It also shares its borders with the Newcastle City Council with suburbs such as Adamstown. How can State Legislation approve regulations that allows different annual caps on developments on one side of the street to those on the other side?

## **Code of Conduct**

A Code of Conduct, together with the requirement that either the Property owner, property owners' agent or property manager must be available by phone 24 hours a day, seven days a week and be able to personally attend the property within an hour, are the key to guaranteeing neighbourhood amenity and the efficient operation of STRAs.

All complaints made on any particular property must be logged and details recorded on the action taken and the results of such action.

A register should be kept by each Council of any Complaints, with the power to ban a property from being used as an STRA if there are more than three justified complaints received in any three year period.

No more controls are required. Anything more would be simply bureaucratic red tape.

## **Register.**

A Register, regardless of how it was kept or by whom, would be either totally useless or cumbersome and expensive to maintain. Individual STRAs are added and taken off the market on a regular basis, (in some areas up to 75% in a year).

Ensuring individual operators registered or de-registered would be impossible.

## **Data Collection**

Again, this would be impossible to collect: a restriction of trade and could also be confidential business information.

The development of a one size fits all data system would be almost impossible and who would be required to supply, collate and confirm its accuracy.

It is fanciful and far too complicated to suggest that a Government Dept. (Dept of Fair Trade) local Councils or an industry body (whoever or whatever that industry is!!!) look after a STRA register for NSW.

Regards,

Mark Hellier  
Managing Director  
Lakeshores Management (NSW) PL  
t.a.  
Lakeshores Holiday and Short Stay Accommodation  
Lake Macquarie

**I agree to the above statement**

Yes

**From:** Mark Hodge <mark@maisonnets.com>  
**Sent:** Thursday, 5 September 2019 6:12 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens on our operations.

As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

I also wanted to send you an email which I sent recently to the team at Airbnb.....

**"I wanted to tell you a little bit more about how much partnering with Airbnb and starting this business has not only meant to me but also for the many people that we have been able to employ and to be able to utilize great skills that our incredible team have.**

**Here goes....**

**You may or may not know that in my former life I was a professional dancer with the Australian Ballet, performed in musical theatre for 17 years, both here and internationally and was also a professional dancer on Dancing With The Stars when it first started many years ago on Channel 7. Once I knew my performing career was coming to an end I looked into working in some way with my other passion which was real estate.**

**I had started my own Airbnb quite successfully and was approached to start a short term Airbnb division with a former work colleague from Bresic Whitney who now has a Ray White franchise but Ray White wasn't ready to go down the short term road so I decided to start my own business. I was also teaching at NIDA for the musical theatre course as well as extensively choreographing, when I went overseas for a holiday. On my last night I was struck by a car in a very serious hit and run accident, covered by Channel 7, which put me in a back brace for the next 6 months.**

**As a result of the accident I was forced to make this business work and fortunately I was able to live from the earnings on my own Airbnb for the first year which was the instigator of the business. Without going into too much of the detail what I wanted to convey is that not only was I able to start a new career, due to adversity but through what Airbnb has created we are able to offer work to full time, part time and contract workers both in Australia and overseas.**

**Here is a list of how our business has created opportunities:**

- We do multiple renovations in multiple states providing work for builders and tradespeople in our extensive makeover arm of the business
- Provide work for stylists by promoting that service with that arm of the business (another passion of mine)
- Multiple cleaning business employment for companies and contractors in 6 states and 1 territory (Sydney being the biggest)
- National linen contracts with two separate linen companies
- Employ staff to do meet and greets
- We were able to employ and help Suzie into a full time role after her business went broke due to the tramworks in Sydney. She is now an integral part of our operation
- We have expanded to Melbourne and now have full time staff there because of the Sydney operation
- Many of our clients have come to us after the rents have dropped severely in Sydney and rather than being forced to sell they are able to achieve a better return with the demand in the short term sector of the market
- We employ tech staff
- Accountants
- Bookkeepers
- Amenities supply companies
- We constantly refer to local businesses, restaurants and cafes
- Promote concierge services such as private chefs and drivers
- Employ photographers nationally
- Printers to create our own welcome guides
- Electricians
- Handymen
- Plumbers
- Insurance companies for short term rental insurance
- Writers for marketing blurbs
- Bloggers
- Lawyers
- Real Estate Agents for referral agreements

These are direct and constant but there are so many other industries that Airbnb and our company are able to Support.

Something that has touched me greatly is working here in Manila with the members of our bookings team and seeing how it helps them and their families. CJ, who has been with us for almost three years went from buying a washing machine for her mum in her first year with us to renovating her parents house this year. Knowing that we can help them to support their families is something well worth fighting for!

One of the big things I am hearing from almost all of our full time property owners is that the properties are maintained to a much higher standard than in a long term scenario as we pay particular attention to it being presented the way it was photographed from the beginning.

**The argument of guests disrupting community and strata buildings is generally unfounded as I have had myself in the past and have heard of way more issues with long standing tenants. "There may be one or two noisy guests along the way but at least they are gone after a few days instead of us being stuck with them for 6 months, 12 months or longer like some of our tenants" was an actual comment by my building caretaker.**

**Whilst some measures are necessary what concerns me greatly are the effects that all of the added safety requirements may have on the decision for some of our owners to want to consider it viable and why there is such a difference between long term and short term for such requirements."**

Thank you for reading and I ask you to reconsider some of the implementations.

Regards

Mark Hodge  
Director

Maisonnets.com

**From:** Mark Hodge <mark@maisonnets.com>  
**Sent:** Tuesday, 10 September 2019 3:39 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

I have a business that represents home-owners who wish to host on Airbnb. Airbnb helps these home-owners to pay the mortgage and the bills, and to share their spaces to guests so that they can become part of other communities.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share the homes of our home-owners.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

#### STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

#### Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Mark Hodge  
132 Barker St  
Randwick, Nsw 2031

**From:** Mark Ruck <fffdining@gmail.com>  
**Sent:** Thursday, 5 September 2019 10:13 AM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

**Categories:** Purple category

Dear Minister, Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry. As a result, regulation for our sector should avoid unnecessary burdens on our operations. As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

Regards

**Mark J. Ruck**  
**Co-Founder**



**M:** [+61 0406663999](tel:+610406663999)

**E:** [fffdining@gmail.com](mailto:fffdining@gmail.com)

**W:** [www.bondipizza.com.au](http://www.bondipizza.com.au)

**W:** [www.ruckgroup.com](http://www.ruckgroup.com)

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**From:** Mark Korsman <lowsidelarry70@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:20 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Mark Korsman  
9 Carawa St  
Blacksmiths, Nsw 2281

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 3:12 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** recorded in DPIE subs register

Submitted on Wed, 11/09/2019 - 03:12

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Mark

**Last name**

Midro

**Name withheld**

No

## Info

**Email**

[mark@barrelmedia.com.au](mailto:mark@barrelmedia.com.au)

**Suburb/Town & Postcode**

New Brighton

**Submission**

We were forced from our home due to the noise and disruption made to our lives by large groups of holiday makers.

- Small 3 bedroom homes allowing 8 - 10 people at stay.
- cars parked everywhere
- non compliant accommodation allowed by council - what I mean is - New Brighton in Byron Shire is on a flood plain - therefore it is illegal to have accommodation on the ground level. If you were to investigate this you would find this over 90% of houses use non compliant rooms for accommodation. The sad thing is council are aware of this and allow it to happen,

**I agree to the above statement**

Yes

**From:** Mark Morrissey <mark@morrissey.com.au>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Mark Morrissey  
5 Beauty Dr  
Whale Beach, Nsw 2107

**From:** mark ng <markng89@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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Thank you for reading my submission.

Regards,  
mark ng  
98 Pacific St  
Tathra, Nsw 2550



**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Monday, 9 September 2019 10:05 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** recorded in DPIE subs register, Purple category

Submitted on Mon, 09/09/2019 - 10:05

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Mark

**Last name**

Oliver

**Name withheld**

No

## Info

**Email**

[mark@webreservations.com.au](mailto:mark@webreservations.com.au)

**Suburb/Town & Postcode**

Byron Bay

**Submission**

Please stop Airbnb from wrecking our town. Too much. Stop them. There must be limits on short term accommodation in residential areas.

**I agree to the above statement**

Yes

**From:** Mark Rubiolo <mark@bubblingwithenergy.com.au>  
**Sent:** Wednesday, 11 September 2019 2:16 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

I operate three properties on short term rental and we have had an amazing time with guests staying. All have been respectful with no issues. We are selective in who we let stay. To seek regulation as strict as what is proposed is absurd. It's costly, time consuming and imply makes it hard for anyone to make any income in this state.

Specifically, I want to comment on the following:

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Thank you for reading my submission.

Regards,  
Mark Rubiolo  
52 Regent St  
Chippendale, Nsw 2008

**From:** Mark Smith <mhsafs@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:13 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because we want to share the empty space we have, we want to meet new people, and we want to be able to enjoy the modest income it brings us.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

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Thank you for reading my submission.

Regards,  
Mark Smith  
27 Waterview St  
Woy Woy, Nsw 2256

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Friday, 6 September 2019 4:20 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** recorded in DPIE subs register, Purple category

Submitted on Fri, 06/09/2019 - 16:20

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Mark

**Last name**

Stephenson

**Name withheld**

No

## Info

**Email**

[mark@dancingemu.com](mailto:mark@dancingemu.com)

**Suburb/Town & Postcode**

2043

**Submission**

I believe that Development Consent Conditions must be respected and preserved : Residential apartment buildings in mixed use and commercial zones with express prohibitions on short term letting must have their development consent conditions respected and preserved.

My strata scheme has introduced a by-law to limit short term stays. This should be respected and maintained and not over ruled. I also support the submission by the OCN .

1. Complying Development: STRA in residential strata schemes must be classed as 'complying development' with inspection by Local Council or a private certifier, not 'exempt development'. This is the only way to ensure the mandatory fire safety standards are met.
2. Day Caps: Un-hosted STRA must be capped at 60 days for the Greater Sydney Region to contain STRA to 'Home Sharing'. All STRA to count toward the cap. No exceptions.
3. Development Consent Conditions: Residential apartment buildings in mixed use and commercial zones with express prohibitions on short term letting must have their development consent conditions respected and preserved.
4. The Register: The planning law changes must not start without The Register, which must be run by Government or a neutral platform not operated or controlled by the short-term letting industry. The Register must include the days of occupation and all the platforms on which the premises is listed, Local Councils must be involved in designing the system. Local Councils and NSW Fire and Rescue must have access to the data.
5. Host Obligation: There must be an enforceable obligation for hosts to register their premises before it is listed and used for STRA purposes. This should be part of the complying development criteria, so it is clear the use of unregistered premises for STRA is illegal and penalties apply.
6. Platform Obligation: There must be a legal obligation for platforms and agents not to list any unregistered residential dwellings for STRA. International experience shows that without such an obligation, platforms will continue to list thousands of illegal apartments. Platforms must also have an obligation to share data with State and Local Government. All listings and other advertising must clearly display the host's unique ID.
7. Charges and Fees: Residential strata schemes must have clear authority to levy additional charges and fees to additional wear and tear and costs whether STRA is hosted or un-hosted.
8. Flexibility: Local Councils must have flexibility to set a lower cap and apply zoning restrictions to meet their strategic planning objectives.

**I agree to the above statement**

Yes



**From:** Mark Tamone <mark@mediabrandaid.com>  
**Sent:** Wednesday, 11 September 2019 2:22 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Rob submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

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Environmental Planning and Assessment (STRA) Regulation 2019

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Thank you for reading my submission.

Regards,  
Mark Tamone  
285 Miller St  
Cammeray, Nsw 2062

**From:** Mark Tomlins <Mark.tomlins@outlook.com>  
**Sent:** Thursday, 5 September 2019 3:49 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** STHL submission - question regarding multiple supporting evidence files

Hi,

I'm looking to make a submission to this consultation, and have approximately 30 to 35 different documents (currently in electronic formats such as pdf, xlsx and docx) I would like to submit as part of my submission, discussing my recent experience of taking my long-term tenant to NCAT after they breached their lease by subletting the property on AirBNB; which highlights several shortcomings of the proposed legislation and regulations. This sub-letting on AirBNB ran for almost two years before it was identified in the building's security camera footage.

Unfortunately, landlords have few options should their tenants breach their lease by subletting the property on AirBNB, even if they have made it clear it is not to be sublet. Having managing agents able to list properties on the STPL exclusion register would go a long way in preventing such a problem; and would also protect long-term tenants from unscrupulous opportunists who lease properties long term in order to sub-let them short term without the landlord's knowledge. In such unauthorised subletting cases, how would enforcement of the proposed STHL fire regulations work? Who would be liable for breaching the regulations?

Stone-walling from my tenant and AirBNB occurred when I had my lawyers request information about this sub-letting activity; given the damage incurred to the property; has limited the avenues I have to pursue for damages. After my tenant claimed a lack of financial means and assets at NCAT, suggesting that further legal pursuit for restitution would result in his bankruptcy, I would like to be able to take AirBNB to court for restitution (given they administer the payments, provide insurance to their "hosts" for property damage, and have not been forthcoming providing the underlying sub-tenants), and seek to have the proposed regulations facilitate this easily. An even better solution would be to lift NCAT's compensation payment limits, from \$30,000, to say \$250,000, and make AirBNB and similar online service providers entities who are eligible to appear before NCAT, to prevent restitution cases clogging up the court lists in the District and Supreme court.

I'd like to provide my lawyers' letter and the responses from my tenant and AirBNB; again in pdfs.

I'd like to provide a copy of my managing agency agreement with my real estate agent; and a copy of the lease; both in pdf and both of which clearly show no subletting was allowed.

I'd also like to provide a copy of my landlord's insurance policy; which shows that it is void if subletting takes place; again in pdf.

I managed to save down a copy of the AirBNB listing in pdf form; which I would like to provide.

Web-scrapes from InsideAirBNB suggest the property was continuously listed on AirBNB, despite the tenant claiming to reside there full time – highlighting one particular shortcoming of the proposed regulations. These web-scrapes, which have been compiled together, go for approximately 5 pages in an excel spreadsheet; which I would like to provide.

I've also got a range of other suggestions, such as that emergency services, such as the Police, Ambulance and Fire Brigade can also record "strikes" against a "host" or "guest"; as well as strata title body corporates where common property gets damaged by "guests"; and that licencing of properties and hosts should occur through Service NSW; just like motor cars, boats and drivers – that way strikes could come with enforceable penalty notices. There are many parallels between the current system which ensures cars are road-worthy, and a potential system which ensures that properties which are STHL are fire-safe.

Would it be possible to have the electronic submission file types expanded to include zip files, or a similar compressed archive format, enabling multiple files to be submitted?

Alternatively, I could print it all out and send it to you that way; hand deliver it (perhaps via some other DPIE employees I am currently working with regarding regional broadband); or e-mail all the attachments through to this address.

Kind regards,  
Mark

Mark Tomlins  
+61 408 626 923

*This message and any attachments may contain information that is confidential and subject to legal privilege. If you have received this message in error, please destroy all copies and notify the sender immediately.*

**From:** Mark Tomlins <Mark.tomlins@outlook.com>  
**Sent:** Wednesday, 11 September 2019 4:20 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Document Annexures for my STHL submission  
**Attachments:** 04 20190713100356512\_C21543718\_upper driveway\_2.mov; 05 20190713101055878\_C21543718\_upper driveway\_2.mov

**Categories:** Rob submission 3.0, non Air BNB run, Attachment to previous sub

Dear Sir/Madame,

These documents are annexures to my submission. Due to the number and size of the documents, I am sending them in multiple e-mails.

Please note that these videos are playable on any Apple device or computer using Quicktime, and on PC's using Windows 10 Movies and Videos player. It may also be possible to play them on other operating systems.

Kind regards,  
Mark

Cheers,  
Mark

Mark Tomlins  
+61 408 626 923

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**From:** Mark Tomlins <Mark.tomlins@outlook.com>  
**Sent:** Wednesday, 11 September 2019 4:53 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Document Annexures for my STHL submission  
**Attachments:** 08 Letter to Airbnb (3465-1050-0621\_1).pdf; 09 Letter to Dylan Porter (3466-1096-7309\_1).pdf; 10 Porter correspondance.pdf; 11 Email from Airbnb 2.9.19 (3476-2711-3485\_1).pdf; 12 Notice of Hearing.pdf; 13 NCAT Application.pdf; 06 Airbnb listing.pdf; 07 Lease Termination 20190719\_170537.pdf

**Categories:** Rob submission 3.0, non Air BNB run, Attachment to previous sub

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**From:** Mark Tomlins <Mark.tomlins@outlook.com>  
**Sent:** Wednesday, 11 September 2019 4:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Document Annexures for my STHL submission  
**Attachments:** 02 Lease Agreement.pdf; 03 RentCover-A4-Flyer.pdf; 01 MT-RWEB Property Management Contract.pdf

**Categories:** Rob submission 3.0, non Air BNB run, Attachment to previous sub

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Mark Tomlins  
+61 408 626 923

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**From:** Mark Tomlins <Mark.tomlins@outlook.com>  
**Sent:** Wednesday, 11 September 2019 9:09 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** STHL submission and document annexures for this submission.  
**Attachments:** STHL submission.pdf; 14 listing identifiers.xlsx; 16 filtered data on specified listing.xlsx; 15 Combined Detailed Calendars.xlsx  
  
**Categories:** Rob submission 3.0, Attachment to previous sub, non Air BNB run

Dear Sir/Madame,

This is my submission as well as some additional annexures to my submission building on my prior e-mails this afternoon containing earlier document annexures.

Kind regards,  
Mark

Mark Tomlins  
+61 408 626 923

*This message and any attachments may contain information that is confidential and subject to legal privilege. If you have received this message in error, please destroy all copies and notify the sender immediately.*



**From:** Marlyn OConnor <marichy5@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Marlyn OConnor  
12 Hurricane Dr  
Raby, Nsw 2566

**From:** Martha Vagenas <mbotzolo@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

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Thank you for reading my submission.

Regards,  
Martha Vagenas  
51 Sir Thomas Mitchell Rd  
Bondi Beach, Nsw 2026

**From:** Marti <martih@iinet.net.au>  
**Sent:** Monday, 16 September 2019 1:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** STRA

**Categories:** Tessa Submissions, non Air BNB run

Dear Planning NSW,

My husband and I are retired and living in a large apartment building.

We cannot afford the extra expense of having Air B and B people treating our home as a short stay hotel. The cost of living here would rise considerably to employ the staff needed to supervise casual visitors.

Our building is complex and only functions properly with all residents knowing and obeying the many regulations controlling behaviour in the building. It is impossible for short stay occupants to learn all this. Chaos results!

Regards

Marti Hinde

1303 Highgate

127 Kent Street

Millers Point

NSW 2000



Virus-free. [www.avg.com](http://www.avg.com)

**From:** Martin Harris <martinharris3@yahoo.com.au>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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I host on Airbnb because...

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Thank you for reading my submission.

Regards,  
Martin Harris  
7 Point Rd  
Northwood, Nsw 2066

Submission from SP 89466 to [STHL@planning.nsw.gov.au](mailto:STHL@planning.nsw.gov.au)

## **Preamble**

The Strata Plan is zoned Commercial and residential and consists of 30 Residential Units and 3 Retail Areas. The plan is relatively new, only 3 years old. About 15% of lots are owner occupied, the remainder being investors with tenants. The Owner's Corporation make this submission as a result recent developments in the Strata Plan.

The Owner's Corporation had discussed a by-law (passed at the recent AGM) disallowing the use of any lot in the strata plan for short-term letting. It had placed a minimum period of 3 months; thereby resolving the problems that were developing with short term letting in one of the lots. Three days after the passing of the by-law, the Department of Fair Trading determined that the Owners' Corporation had no such ability thereby undermining the Owner's corporation. It must be remembered that all the information coming from legal and strata forums on this subject was that the Government was planning such an announcement.

Some owners and tenants have approached the local Bayside Council for remedial action, only to be told that they only deal with zoning concerns and if antisocial behaviour occurs, their only resort is to call the police. (As if that is the primary concern of police on weekends!)

Since the AGM and the subsequent disallowance of the By-Law, the Owner's Corporation has been severely limited in what they can do to prevent a series of issues that have had to be confronted.

No doubt other Strata Schemes are confronted by issues created by Short Term Letting that are detrimental to the well being of the residents. This submission is a result of a current discussion paper commissioned by Hon Matthew Kean MP. It arises out of a need to clarify what is and what is not permissible under the STHL in strata schemes. From the outset, there would be no need for this discussion paper and this submission had the Office of Fair Trading not issued its directive that Owner's Corporation had no power to pass By-laws that restrict STHL in strata schemes.

## **Issues raised by STHL**

A series of incidents that occurred in this Strata Complex has raised the topics that need to be addressed in Short Term Housing (Airbnb) lettings.

- Noise
- Security
- Illegal and anti social behaviour
- Residents' wellbeing
- Extra costs born by the Owners Corporation
- Loss of Value of the individual Lots
- Surrounding neighbourhood



Depending on the strategic location of differing lots, residents are affected proportionately. Hence, residents located next to or below the offending Lots have to cope with the excessive noise, abuse, smoke, antisocial behaviour etc.

Residents (owners and tenants of Lots) in this complex have had to face the following issues in the last few weeks:

**1. Noise**

SHTL guests create excessive noise as they occupy the Lot for birthday parties, recreation and other events. The noise created by loud base music reverberates throughout the building; boisterous calling and yelling due to guests being drunk and disorderly have been noted and cited. Police have been called by residents due to the excessive noise only to have the call ignored and then having to attend to their work the following day. Even when confronted by residents, the guests simply attend to their own celebrations ignoring the welfare of those who live in the complex. Some owners who confront the guests for their noisy parties have been abused and sworn at.

**2. Security**

Guests leave the main doors open for easy entry for other guests; this raises security issues for all residents. This has been noted on several occasions but owners/tenants. There are retired residents living in the complex. It's not safe for them (or anyone for that matter) to confront drunk (or drug affected) guests in the middle of the night!

**3. Illegal and anti-social behaviour (Safety)**

The antisocial behaviour from an 8<sup>th</sup> floor apartment has resulted in beer bottles smashing on resident's courtyard, cigarette butts strewn on the courtyard, soft and beer cans, chewing gum and on one occasion urinating from the 8<sup>th</sup> onto the 2<sup>nd</sup> floor and into the patio on the 6<sup>th</sup> floor, whose children were playing outside. One can imagine if the glass bottle fell onto the head of a child!! Who would bear the cost of such insurance litigation?

**4. Residents Wellbeing**

The experience in this strata scheme is that self-regulation of STHL does not work. Considering the events of the past few weeks, we can only confirm that self-regulation by owners of SHTL are not interested in the well-being of others; their focus seems to be on only ONE thing, namely, maximizing the income from their investments and they take no responsibility nor do they care about the well being of the residents in the complex. Therefore it is incumbent that either Owner's Corporation or Statutory Legislation limit SHTL stays and activities, thereby looking to the wellbeing of all residents in the strata scheme.

**5. Extra Costs borne by Owners Corporation**

The parties/celebrations not only cause discomfort for the residents, the guests also create inordinate amounts of litter. They discard take away containers, beer bottles a plenty, plastic containers and other types of refuse that are accumulated in the common area only to be cleaned up by the Strata cleaners. These are extra costs that are borne by the strata complex. These costs are in addition to the wear and tear of carpets, lifts, power and other general wear and tear by more people using the shared facilities.

**6. Loss of Value of the individual Lots**

The excessive noise, anti social behaviour, the abuse, and disrespect shown by the guests towards residents have led to tenants wanting to terminate their leases. This has the knock on effect of giving the strata complex a negative image and owners having to reduce rents to attract tenants. In turn this causes lessors attracting lower quality tenants for their Lots. The overall effect would be the

lowering of the standard of the building and the lowering of the owner-occupiers and investors value of their asset.

7. Not only does the offending Lot affect the nearby neighbours, the non responsible owner also affects neighbours in other nearby complexes. On speaking with the Strata Managers for this complex, many hours have been spent fielding complaints from residents in other strata schemes about the excessive noise, disturbances, anti-social behaviour witnessed by residents and reporting them to the strata managers. In short, this strata scheme and others are seriously and adversely affected by the operation of this one Lot.

## **Summary**

In a recent article in the SMH (30/09/17) an owner of a Lot challenged the By-laws of a Owners Corporation restricting the owner's ability to have STHL. The tribunal ruled in favour of the Owner. It seems all one-way traffic where the rights of STHL are protected and the rights of other residents in the complexes are ignored. Both Section 139 of the recent Fair Trading decision and the Tribunal's latest decisions are flawed in that the owner of a Lot within a complex can have all the rights of private ownership at the expense of rights of others in the complex. It leads one to question who is lobbying whom and for who's benefit. Enough is enough. The personal and property rights of others in the strata schemes must also be taken into account. It ought not be a one-way street!

Above are some of the lived experiences for this complex. Residents' health, security, finances have been affected. Residents in other strata complexes are also affected by one STHL Lot as the owner is not residing in it.

Residents, whether they be owner-occupiers or investors should have a right to determine how one Lot within a complex which affects the lives of so many in a negative way can and should be used.

Owners purchased their Lots and paid premium prices for them. Owner-occupiers and tenants desire to live harmoniously within a community complex. They do not want to be abused, placed in danger; feel insecure by fly in fly out guests and pay extra for the privilege.

They should have the right to say "no" to Short Term Holiday Lettings to any owner who wants to exploit the strata scheme for his/her financial gains and disregarding the welfare of others.

Absent landlords should not be permitted STHL when they are not present to temper the unruly behaviour of their guests, leaving the unsavoury and unpalatable behaviour to be dealt with by residents in the complex.

At the very least, Owner's Corporation should have powers to pass By-laws restricting such tenancies and that the by-laws be upheld.

## **MARTIN POLLOCK SHORT TERM SUBMISSION**

### **BACKGROUND**

On reading the first and second readings of the Fair-Trading Amendment (Short Term Rental Accommodation) Bill 2018, it is evident that the intention of Parliament is to address the negative impact that short term rental arrangements has had on neighbouring properties including lots within a strata Scheme. As such it is being proposed to introduce, what was described in Mr Matt Kean, in the first reading on 6 June 2018 as the “toughest mandatory code of conduct in the country”. This code will be establishing a complaints system, and significant penalties for non-compliance.

I applaud the new code of conduct measure however, the proposed changes in strata schemes to prohibit owners who own a lot, which is not their principal place of residence goes far beyond the purpose for introducing the short-term rental controls. It was stated by the Honourable Scott Farlow in the second reading of the Bill on 14 August 2018 that the proposed amendment

*“will allow the adoption of by-laws to prohibit the use of lots for short term rental accommodation, but only when the lot is not the principal place of residence of the person who is letting out the lot. This approach will ensure that the lot owners can let out their properties when they are on holidays or when they are present and are sharing their home. However, it will also allow owners’ corporation to prevent short-term letting which is carried on year-round as the primary purpose of the property”.*

The basis for the proposed changes excludes the rights of a significant class of lot owners, who own a lot which is neither a principal place of residence or which is leased out all year round. This class of lot owners own a lot which is used as either their “holiday apartment or used as a secondary residential property, where they spend a large portion of the year away from their principal place of residence. The Bill and the proposed introduction of S137A of the Strata Schemes Management Act 2015 severely prejudices this class of lot owners, as it deprives them of also availing themselves of the advantage of leasing out their “holiday apartment”, while they stay home in their permanent place of residence during the peak holiday season periods.

I submit that the “toughest mandatory code of conduct” can be introduced to stamp out unruly behaviour of those who may abuse the short term rental privilege but that does not mean that the changes must significantly prejudices a not insignificant number of law abiding lot owners who just want to enjoy residing in their lot and have the same rights as other lot owners.

In addition, I respectfully submit that the proposed By-Law as set out in S137A would be invalid and unenforceable and would most like result in a significant spike in disputes between lot owners and owners corporations and matters before the NSW Civil and Administrative Tribunal. The basis of my submission is set out below.

### **DEALING RELATING WITH A LOT**

Section 139(2) of the Strata Schemes Management Act 2015 (hereinafter referred to as the “Act”) states the following:

*No by-law is capable of operating to prohibit or restrict the devolution of a lot or a transfer, lease, mortgage or other dealing relating to a lot.*

A lease is legally created when an owner of a property offers to another party, and the other party accepts, to possess and use the owner’s property for a certain period of time without acquiring ownership of the property. In other words, it is a commercial arrangement between two parties. Short term rentals are also governed by lease agreements and, as such, it is submitted that the introduction of a by-law under the Act that prevents short term rental leases would be invalid. Such

## **MARTIN POLLOCK SHORT TERM SUBMISSION**

a by-law would be contrary to S139(2). Further, such a by-law would be contrary to S136(2) of the Act which reads:

*A by-law has no force or effect to the extent that it is inconsistent with this or any other Act or law.*

It is submitted that proposed amendment to the Act to introduce Section 137A is unenforceable as it attempts to place a total ban on a lot owner, who owns a lot which is not the owner's principal place of residence, from entering into a short-term lease of the lot. It is submitted that the passing of such a by-law as outlined in S137A, would immediately have no force or effect as it would contravene S139(2) and S136 (2).

### **BY-LAW CANNOT BE UNJUST**

S139(1) of the Act reads:

*A by-law must not be harsh, unconscionable or oppressive.*

#### **Note.**

*Any such by-law may be invalidated by the Tribunal (see section 150).*

This section of the Act has been the subject of a number of decisions of the NSW Civil and Administrative Tribunal. I refer to what, is now becoming, the leading case in relation to S139(1) namely, *Yardy v Owners Corporation SP57237* [2018] NSWCATCD 19, wherein it was held that a by-law which totally banned an owner from keeping a pet was harsh, unconscionable and oppressive. It was held that the by-law "does not involve or permit a balanced consideration of the interests and needs of **all** lot owners or occupiers and operates only in the interests of lot owners who are opposed to pet ownership". It was also held that a by-law "completely preventing an owner from keeping any animal as a pet, is contrary to a lot owner's basic habitation rights.

The *Yardy* case was decided on 19 February 2018 and was followed on 9 August 2018 in the case of *Gurram v Owners Corporation SP 36589* [ 2018] NSWCATCD 39, which is a case involving a ban on hard flooring in a lot. Such a blanket ban was deemed to be "harsh, unconscionable and oppressive".

It is submitted that the law in NSW is settled and that any By-Law which attempts to impose a blanket ban on a lot owner will be held to be harsh, unconscionable and oppressive. As such, it is submitted that a total ban on lot owners, who own a lot which is not their principle place of residence, from leasing their lot on a short-term rental basis would be equally harsh, unconscionable and oppressive and , as such, would be an invalid by-law.

### **CONCLUSION**

It is submitted that the proposal to introduce S137A of the Act would amount to the introduction of a by-law which would be illegal under the current provisions of the Act pursuant to S139(1), would be held to have no force or effect pursuant to S136(2) and would in total contraction to the established law in NSW as held in the fore-mentioned *Yardy* decision and subsequent cases. I therefore seek that the proposal to prohibit short term rental for lot owners that own a lot which is not their principal place of residence be abandoned or abandoned at least in respect to lot owners who a lot which is their "secondary" place of residence and who do not lease their lot on an all year basis.

**From:** Martin Richards <martin.richards@bigpond.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Martin Richards  
5 Belcote Rd  
Longueville, Nsw 2066

10.9.19

Dear Minister,

The Rocks area has significantly changed in the last 4 years due to the Government sale of Public Housing in the district. A once close residential community has now been eradicated. However now the area has a new life, with once dilapidated houses being beautifully restored to their former glory.

Through short term rental of these properties the Rocks area is being 'rediscovered' and is proving very popular with tourists and locals alike.

A huge boon for Tourism economy and thus for all in residents of NSW.

Our 3 bedroom property in Dawes Point provides cost effective holiday accommodation for *families* in the CBD. Hotel accommodation is not always suitable for families.

We have hosted families from all over the world as well as many Sydneysiders taking advantage of the space available in a house to accommodate Brides/Grooms and the wedding party. With local sights very popular for wedding photography our house location and size are ideal.

Families who stay in our property contribute greatly to the local economy.

The Rocks area is predominately a Tourist sector and no longer core residential.

Regardless we still manage our property well, with a robust vetting system requiring ID and stringent contract detailing curfews and noise management.

Our property is listed with Heritage Register and State Trustee.

It *was* a long term rental property which was able to fall into disrepair as rent was low.

Significant capital works were required to save this former Public Housing property and restore it to its Heritage glory.

By using Short term holiday lease method, to guarantee our income and remain competitive in the market, we must actively maintain the property at very high level – a much higher level than if the property was a long term lease.

This ensures the house does not fall into disrepair and greatly contributes to the unique significance of the area for all - allowing Tourists and locals to continue to enjoy.

We oppose the night limits for properties in a tourist destination such as The Rocks.

There is an opportunity NOW with this Short Term Legislation to capitalise on the growth of the Rocks area, and to legislate to zone this as applicable to rent 365 days a year.

With regards

Martine La Fontaine

0438438280

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Tuesday, 10 September 2019 5:25 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

Submitted on Tue, 10/09/2019 - 17:24

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

martine

**Last name**

la fontaine

**Name withheld**

No

## Info

**Email**

[martinelafontaine1@bigpond.com](mailto:martinelafontaine1@bigpond.com)

**Suburb/Town & Postcode**

williamstown 3016

**Submission file**

[short-tem-rental-accom-feedback-10.9.19.docx](#)

**Submission**



Please see attached file

**I agree to the above statement**

Yes

**From:** Martyn Wilson <minkymouse23@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:23 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it gives my partner and I an opportunity to earn extra funds to support ourselves in our retirement. We like to meet and host guests from Australia and around the world and offer a customised service to all our guests.

We have one apartment in Darlinghurst which is listed on Airbnb and is not listed on any other platform. We run our listing and apartment in a professional and responsible manner. We see our listing as our business and therefore our behaviour and services provided are focused on boosting our credibility and reliability.

To date, we have hosted over 200 stays. We have never received a complaint from guests or any resident or tenant within our small apartment block.

We also meet our guests on they arrival. We do not have a latch key system. We also close the calendar to bookings when we are not in Sydney; in other words, we do not rely on other people to act of proxy hosts.

The Airbnb host community depends on hosting as an economic lifeline to help us support our retirement without resorting to Government assistance and support for paying bills. We also recommend our favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

We are deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for us to share our apartment.

I understand that the Government has made commitments to support 'fair short term rental accommodation (STRA) regulation that supports the sharing economy'.

Generally, I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people and for us who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year,

this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

#### Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my apartment before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my apartment is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my apartment for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

I also believe that the proposed regulation and strike out system where the guest displays problematic behaviour, but the punishment falls directly upon the host is wrong and unfair. A host in good faith lets their entire house or apartment to a guest who they believe will act in good faith. All Airbnb hosts are required to set House Rules. Our House Rules clearly state that parties, noise and abhorrent behaviour will not be tolerated which could lead to the stay being terminated and Airbnb informed, and Police is necessary. I believe a more nuanced system should be developed to punish the guest if the guest solely contravenes the Code of Conduct. I suggest all guests when booking be asked to sign that they have read and understood a summary of the Code of Conduct before their booking is confirmed. This summary would highlight appropriate, expected behaviour and which behaviour will not be tolerated. As proposed, the 2 strike rule seems to only apply to hosts. I suggest guests who are found to contravene the Code of Conduct should be flagged by Airbnb (in our case), so they cannot book any accommodation with a host on Airbnb for 2 years after 2 strikes. This way the responsibility falls to the perpetrator. Any other way means the perpetrator walks away while the host takes all the responsibility. This is unjust.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home

sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Martyn Wilson  
53 Ryan St  
Lilyfield, Nsw 2040

**From:** Mary Bernadette <maryvsp@optusnet.com.au>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

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I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Mary Bernadette  
9 Hobson Cl  
Bellingen, Nsw 2454

**From:** Mary Dorahy <maryanndorahy@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

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## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Mary Dorahy  
45 The Esplanade  
Oak Flats, Nsw 2529



**From:** MARY Hashemi <mhshn1979@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

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Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
MARY Hashemi  
83 Dalmeny Ave  
Rosebery, Nsw 2018

**From:** Mary Lane <marylane23h@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:23 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Rob submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because I have had enormous pleasure over almost six years in meeting and helping a great number and variety of people at the same time as I supplement my limited retirement income. Families who have stayed in my house include those visiting relatives in the local area; some coming for special events such as weddings; mature age students enrolled in PhD studies at Macquarie University; people needing accommodation while they attend specialist medical services at local hospitals; occasional tourists; sporting enthusiasts and Easter show workers from regional towns who value my proximity to Olympic Park and people on PR visas keen to get to know regular friendly Australians as they begin the challenge of making our wonderful country their new home.

My current guests from Iran fall into this last category and are benefiting greatly by having me able and willing to share local knowledge in a patient and positive way.

All of these guests have enjoyed dealing with local business people at Midway and Top Ryde because I recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following: regulations that would mean additional spending on lighting and other home safety measures. My smoke alarm installed immediately outside the booked bedrooms, a carbon monoxide alarm, fire blanket and small fire extinguisher in the kitchen already make my home safe for my guests. Added expense would make home sharing unviable for me. I live in an area where rent must be kept at a moderate level and I aim to present my home as "a home away from home". It has been made safe for me, so safe for others to enjoy.

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

## Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
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## STRA Property Register

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## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Mary Lane  
23 Haig Ave  
Denistone East, Nsw 2112

**From:** Mary Mcauley <marykmcauley1958@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:16 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

#### STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

#### Environmental Planning and Assessment (STRA) Regulation 2019

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Mary Mcauley  
11 Commerce Dr  
Lake Illawarra, Nsw 2528

**From:** Mary Merlino <marymerlino1@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because of the ease and control I have over sharing my home with guests. My Airbnb is one private room and my guest is more a part of the household.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills.

I recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism. I guide Airbnb guests toward local businesses by conversing and providing a folder for them. The folder contains a Sydney map and information thereby advertising and promoting nearby businesses: transport options - (aside public), i.e., shuttle services and tourist bus companies; sightseeing - both in and out of Sydney City, e.g., The Blue Mountains and Sydney Beaches; local business - i.e., eateries, restaurants and shopping at Broadway Shopping Centre, Paddy's Market and Chinatown, The Rocks, Circular Quay and Sydney CBD.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home

before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

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#### Code of Conduct

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Mary Merlino  
212 Bulwara Rd  
Ultimo, Nsw 2007



**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 5:10 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Rob submission 3.0, non Air BNB run, council submission

Submitted on Wed, 11/09/2019 - 17:05

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

**First name**

Mary-Anne

**Last name**

Crawford

**Name withheld**

No

## Info

**Email**

[mcrawford@singleton.nsw.gov.au](mailto:mcrawford@singleton.nsw.gov.au)

**Suburb/Town & Postcode**

Singleton

**Submission file**

[singleton-council-submission-into-short-term-rental-accommodation.pdf](#)

**Submission**

Please refer to the attachment.

**I agree to the above statement**

Yes

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 2:51 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** recorded in DPIE subs register

Submitted on Wed, 11/09/2019 - 02:50

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Mary Ann

**Last name**

Irvin

**Name withheld**

No

## Info

**Email**

[maryann.irvin@gmail.com](mailto:maryann.irvin@gmail.com)

**Suburb/Town & Postcode**

2064

**Submission**

I am overseas at present and unable to read all the documents. However, I have strong thoughts on this so-called "sharing economy".

I agree with the points put forward by OCN:

1. Complying Development: STRA in residential strata schemes must be classed as 'complying development' with inspection by Local Council or a private certifier, not 'exempt development'. This is the only way to ensure the mandatory fire safety standards are met.
2. Day Caps: Un-hosted STRA must be capped at 60 days for the Greater Sydney Region to contain STRA to 'Home Sharing'. All STRA to count toward the cap. No exceptions.
3. Development Consent Conditions: Residential apartment buildings in mixed use and commercial zones with express prohibitions on short term letting must have their development consent conditions respected and preserved.
4. The Register: The planning law changes must not start without The Register, which must be run by Government or a neutral platform not operated or controlled by the short-term letting industry. The Register must include the days of occupation and all the platforms on which the premises is listed, Local Councils must be involved in designing the system. Local Councils and NSW Fire and Rescue must have access to the data.
5. Host Obligation: There must be an enforceable obligation for hosts to register their premises before it is listed and used for STRA purposes. This should be part of the complying development criteria, so it is clear the use of unregistered premises for STRA is illegal and penalties apply.
6. Platform Obligation: There must be a legal obligation for platforms and agents not to list any unregistered residential dwellings for STRA. International experience shows that without such an obligation, platforms will continue to list thousands of illegal apartments. Platforms must also have an obligation to share data with State and Local Government. All listings and other advertising must clearly display the host's unique ID.
7. Charges and Fees: Residential strata schemes must have clear authority to levy additional charges and fees to additional wear and tear and costs whether STRA is hosted or un-hosted.
8. Flexibility: Local Councils must have flexibility to set a lower cap and apply zoning restrictions to meet their strategic planning objectives.

**I agree to the above statement**

Yes

**From:** Matt & Marli Fogarty <mattandmarli1@gmail.com>  
**Sent:** Friday, 6 September 2019 9:05 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid any burdens on our operations.

As a responsible operator, I strongly oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on. We rely on this income to help pay the mortgage on our home.

We can understand why there might be restrictions in apartment buildings in the major cities, however to impose any kind of restrictions in regional areas is grossly unfair and significantly impacts a desperately needed source of income in these areas.

I can also add that we have never ever had any complaints from any of our neighbours in relation to short term holiday stays at our properties. All our holiday makers are well aware that we have neighbours and have always been respectful in that regard. In fact we have had far more problems and complaints from neighbours in relation to our long term tenants.

In our view the imposition of restrictions is a heavy handed approach that punishes the vast majority of holiday accommodation owners because of a small minority of irresponsible owners in larger cities.

We are also very aware that these proposals are being driven by hotel operator lobby groups in a cynical attack on mums and dads – simply out of greed. Supporting these proposals puts the government on the side of big business and against the voting public. We will be watching you.

Regards  
Matt Fogarty

**From:** Matt Houweling <matt.houweling@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:16 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because, the cost of living makes it a challenge for me to afford a property and get ahead.

I enjoy the ability to host people from different walks of life, cultures and nationalities. It has opened my eyes up to cultural diversities and acceptance. Some of the conversations that I have had with guests, and the views I now hold were different from that formed in the media.

For me leaving Airbnb the way it is, is about giving an opportunity for individuals to make ends meet and increase social acceptance of cultural differences.

Thank you for reading my submission.

Regards,  
Matt Houweling  
36 Bellevue St  
North Parramatta, Nsw 2151

**From:** Matt lee <ma77lee@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

Please see below my feedback on the Government's proposed regulations.

The air Bnb host started as a concept where people can easily and cheaply "share" their home.

I do not agree that investors, purchase properties with the sole objective of short term holiday rental, particularly if they do not even live in the area.

There should be regulations to ensure investors do not purchase or build private homes for the sole purpose of running a boutique hotel (full time holiday lett)

The Airbnb platform started as a means for home owners to rent out their family home or a spare granny flat for a few weeks/months a year.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for home owners to rent out their home.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Matt lee  
660 The Pocket Rd  
The Pocket, Nsw 2483



**From:** Matt Nielsen <matt@vbeach.com.au>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

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Thank you for reading my submission.

Regards,  
Matt Nielsen  
38 Cylinders Dr  
Kingscliff, Nsw 2487

**From:** Matt Olson <matthewolson17@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

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Thank you for reading my submission.

Regards,  
Matt Olson  
48 Beach Rd  
Bondi Beach, Nsw 2026

**From:** Matt Patterson <matthew.patterson@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because I enjoy meeting new people and I enjoy being part of the housing supply solution as well as helping make my cost of living more affordable.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

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Thank you for reading my submission.

Regards,  
Matt Patterson  
33 Hutcheson Ave  
Rankin Park, Nsw 2287

**From:** Matt Sproule <jenmatt16@gmail.com>  
**Sent:** Friday, 6 September 2019 8:00 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry. As a result, regulation for our sector should avoid unnecessary burdens on our operations. As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

Matt Sproule

HomeAway host on the South Coast NSW.

**From:** Matthew Brew <matthewbrew@hotmail.co.uk>  
**Sent:** Wednesday, 11 September 2019 2:16 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because I am trying to pay off my mortgage faster and would also like some extra income when I retire.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Matthew Brew  
32 Victoria Ave  
Concord West, Nsw 2138

**From:** Matt Burke <matthewcarsonburke@gmail.com>  
**Sent:** Monday, 19 August 2019 8:48 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Re: Holiday rental regulations for NSW

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category, sent

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens on our operations.

As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

As holiday rentals like mine become more important to the tourism economy, it's my strong belief the NSW Government should build a regulatory solution that ensures the sector can reach its economic potential. My property allows for families and friends to holiday together under one roof, its something that traditional hotels and single room accomodation can't provide.

Thank you reading my submission.

Regards

Matthew Burke

**From:** Matthew Doolan <mattdoolan3@bigpond.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

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I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

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Thank you for reading my submission.

Regards,  
Matthew Doolan  
9 Preo Pl  
Tathra, Nsw 2550

**From:** Matthew Eager <matthewjameseager@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:21 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because I haven't worked since 2014 and need an income. It's pretty clear the Australian government doesn't want to pay for unemployed or old people to survive so if I didn't make money from letting the unused bedrooms in my house I'd be left high and dry.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

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Thank you for reading my submission.

Regards,  
Matthew Eager  
249-251 Katoomba St  
Katoomba, Nsw 2780

**From:** Matthew Fogarty <mattandmarli1@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it helps me to pay my mortgage. I have a fully self contained 2 bedroom apartment on the bottom floor of my house and use this to earn extra income to help pay the mortgage. Without this additional income I would not be able to afford to own a home. I have at times had permanent tenants in the apartment but they caused so much trouble - failure to pay rent and utilities, noise complaints, rubbish on the property - that we had to stop doing it.

We have never had any issues with any visitors, and have never had any complains or issues raised by any of our neighbours. In fact some of our neighbours make use of the apartment when their family and friends visit.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

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Thank you for reading my submission.

Regards,  
Matthew Fogarty  
12 Bailey Pl  
Tura Beach, Nsw 2548



**From:** Matthew Hescott <hescottmatt@icloud.com>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it is part of my livelihood in our small local area where income isn't easy to come by.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Matthew Hescott  
Victoria St  
Penrose, Nsw 2579

**From:** Matthew Lowry <matthew72lowry@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

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Thank you for reading my submission.

Regards,  
Matthew Lowry  
Glenayr Ave  
Sydney, Nsw 2026

**From:** Matthew Sorensen <mattsorro@yahoo.com.au>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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Thank you for reading my submission.

Regards,  
Matthew Sorensen  
32 Croydon St  
Cronulla, Nsw 2230

**From:** Matthew Spro <Jenmatt16@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because I believe it brings a competitive edge to the short term rental market. It also brings tourism dollars to the South Coast area. My neighbours are aware we are Airbnb hosts and are comfortable with us hosting guests.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

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Thank you for reading my submission.

Regards,  
Matthew Spro  
9 Surf Beach Rd  
Kianga, Nsw 2546



**From:** maureen terry <maureenterry11@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:22 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Rob submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

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Thank you for reading my submission.

Regards,  
maureen terry  
16 Darley St  
Shellharbour, Nsw 2529

**From:** no-reply@planning.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Friday, 23 August 2019 9:44 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category

Submitted on Fri, 23/08/2019 - 09:44

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Max

**Last name**

Bancroft

**Name withheld**

No

## Info

**Email**

[maxban1938@yahoo.com.au](mailto:maxban1938@yahoo.com.au)

**Suburb/Town & Postcode**

Narellan Vale

**Submission**

Many shopping centers have shops that have been empty for many years, they could be put to use providing temporary shelter for the homeless.

**I agree to the above statement**

Yes

**From:** Maya Gazzard <mgazzard@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it helps to pay my mortgage.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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Thank you for reading my submission.

Regards,  
Maya Gazzard  
520 New Canterbury Rd  
Dulwich Hill, Nsw 2203

**From:** no-reply@planning.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Friday, 23 August 2019 12:27 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Submitted on Fri, 23/08/2019 - 12:27

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Md

**Last name**

Jahan

**Name withheld**

No

## Info

**Email**

[tilok18@gmail.com](mailto:tilok18@gmail.com)

**Suburb/Town & Postcode**

2000

**Submission**

# Thanks for supporting STRA

# Mandatory code of conduct without harshness is enough to regulate.

# Please don't introduce registration system. It will create extra work and may discourage STRA. Please don't place any unnecessary burdens.

# Please don't give any power to strata to ban STRA because they unfairly dictate other owners

# Please allow STRA whole year without cap.

**I agree to the above statement**

Yes



**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Tuesday, 10 September 2019 7:56 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** recorded in DPIE subs register

Submitted on Tue, 10/09/2019 - 19:55

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Md Kamruzzaman

**Last name**

Howlader

**Name withheld**

No

## Info

**Email**

[shamrat1979@yahoo.com.au](mailto:shamrat1979@yahoo.com.au)

**Suburb/Town & Postcode**

Yahoo

**Submission**

Yes.. need short time .

**I agree to the above statement**

Yes

**From:** no-reply@planning.nsw.gov.au on behalf of Department of Planning,  
Industry and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Friday, 16 August 2019 8:43 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Cc:** DPE PS ePlanning Mailbox  
**Subject:** Have your say on Short Term Rental Accommodation

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category

Submitted on Fri, 16/08/2019 - 20:42

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Meiwen

**Last name**

Chen

**Name withheld**

No

## Info

**Email**

[meiwen\\_chen@hotmail.com](mailto:meiwen_chen@hotmail.com)

**Suburb/Town & Postcode**

2127

**Submission**

I support this regulation of STRA. It's a win-win result for both traveller and host. It can make a great contribution to the travel industry.

**I agree to the above statement**

Yes

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-----  
This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it immediately.

Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the NSW Office of Environment and Heritage.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

**From:** Melanie Galea <melgalea00@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:20 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Rob submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it subsidises our business during the quiet periods.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

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## Code of Conduct

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Thank you for reading my submission.

Regards,  
Melanie Galea  
6 Berambling Crest  
Berambling, Nsw 2758

**From:** Melinda Cole <melinda.cole@bmf.com.au>  
**Sent:** Thursday, 5 September 2019 9:42 AM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

**Categories:** Purple category

Dear Minister,

The following reflects my views on the proposed changes to STR letting.

Short-term rental accommodation is an important driver of economic growth, government income and job creation for the NSW tourism industry.

We pay significantly more tax and penalised heavily under a PAYG system up to 50% of our income as opposed to nil for a lot of multinational hotel companies who have lobbied for these changes.

We put more money into the local area as well as government coffers. Our homes are generally in areas where hotels are not located so we put more money into local areas that generally don't see tourists.

As a result, regulation for our sector should avoid unnecessary burdens on our operations. As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct.

However, I STRONGLY oppose the night limits and use restrictions for our properties – while I am a stay at home host, I may want to list as a whole home in the near future.

This is a very obvious ploy to discourage people listing whole homes which is the most popular option for tourists. Limiting to letting 50% of the year simply makes it unprofitable for hosts and they won't list. It does not limit any noise or issues that come with whole homes. So the limit DOES NOT address that issue correctly.

Furthermore. 99 percent of hosts DO NOT want parties or bad guests in their home. We don't want our homes trashed and we do want to be good neighbours. We monitor and screen guests to the best we can.

But with our incomes restricted we may be forced to take more chances with guests so I can only see this measure increasing a problem.

Regards.  
Mel

**From:** Melinda Cole <mel.cole@optusnet.com.au>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

I am an Airbnb host in a Sydney suburb.

I host on Airbnb because with a high mortgage, the increasing costs of electricity and water and no wage growth I am in danger of not being able to afford my own home.

I also know that hosts pay much higher taxes to the government than international companies which pay next to nil tax so we contribute much more to the economy.

I also host in an area that is not serviced by any commercial hotels so my guests spend money in the immediate area as opposed to guests stuck in tourist traps. Hosts in my area recommend our favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following as I believe most are being introduced as difficult and unnecessary red tape and road blocks to make it near impossible for hosts to implement. ( I have used pre written copy as a base and have edited it to reflect my views and my own experiences):

#### STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. Holiday homes have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Private holiday homes fill a gap in the lodging market. Most of the hotels in existence and being built are in the 4-5 star market. Families may not be able to afford this level and welcome a more budget friendly 2-3 star accommodation, then spend more on food and attractions. This is much better for local businesses.

With the complex rules making fewer properties available on the market for families visiting Australia from overseas will mean much less tourist spending in NSW. They will travel to other states and countries that will suit their budget. Not every family can afford a 4-5 star hotel in the CBD so holiday homes fill a gap that will never be filled by commercial lodgings. Both in price AND location.



I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests.

I support the NSW Government streamlining safety regulations which:

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Thank you for reading my submission.

Regards,  
Melinda Cole  
491 Cleveland St  
Redfern, Nsw 2016

**From:** Melissa Amadio <mel.amadio86@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:20 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Melissa Amadio  
33 Kunama Dr  
East Jindabyne, Nsw 2627

**From:** Richard Hopkins <rich.hopkins@icloud.com>  
**Sent:** Tuesday, 20 August 2019 6:46 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Re: Holiday rental regulations for NSW

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category, sent

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens on our operations.

As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

As holiday rentals like mine become more important to the tourism economy, it's my strong belief the NSW Government should build a regulatory solution that ensures the sector can reach its economic potential.

Thank you reading my submission.

Melissa and Richard Hopkins

**From:** Melissa Bonney <melissa@barefootescapes.com.au>  
**Sent:** Wednesday, 11 September 2019 2:23 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Rob submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because we have two holiday properties in Byron Bay that we run as an accommodation business and use for our own personal use as well. AirBnB is a great platform to promote the houses, but we also have them managed by a professional property management team, Luxico Byron Bay to ensure both guests and neighbours are taken care of.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. We also have a detailed compendium at the properties and online where I recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism. We also use social media extensively to do this - @barefootescapes.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my homes.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive. For us specifically, the increased requirements regarding properties within bushfire zones are particularly onerous. We have recently completed significant renovations and building works to both houses and are fully compliant with all of the requirements so this would represent an additional expense and further unnecessary restrictions. Our particular location is actually within the central CBD area, but is across from a lovely nature reserve in the old town section so have a BAL29 rating imposed.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW

Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

We already adhere to all of these things as providing a high end, luxury home with all of the inclusions is what we are aiming for. We are already an exclusive AirBnB Plus host and a SuperHost.

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Melissa Bonney  
89 Wordsworth St  
Byron Bay, NSW 2481

**From:** Melissa Heath <melissa\_heath@icloud.com>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
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## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Melissa Heath  
4 John St  
Queens Park, Nsw 2022



**From:** Melissa McLeod <meljmcLeod@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
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## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Melissa McLeod  
18 Londons Rd  
Lovedale, Nsw 2325

**From:** Melissa Sangster <melsangster@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Rob submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

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## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Melissa Sangster  
46 Bangalow Rd  
Byron Bay, Nsw 2481

**From:** Melody Durupt <ladymelodytravel@hotmail.fr>  
**Sent:** Wednesday, 11 September 2019 2:22 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host, this is my feedback on the Government's proposed regulations.

Airbnb provides me with quick access to insurance verified ID of people staying with me.

AirBnB is the legal upgrade from couchsurfing that I have been doing for 20 years. Before it was free to help people feel home away from home. Now thanks to Airbnb, my services can also help me pay my bills.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

AirBnB hosts are not hostels, and if the requirements are too high, you will just generate a black market...

Regulations needs to be "fair" and "supports the sharing economy" that can boost the global economy of the all country.

Generally I support the Government's approach, however parts of the current proposals are unfair and go too far in my eyes.

Specifically, I want to comment on the following:

#### STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits.

For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing.

Maybe 2 permits could be created, depending on the income generated, or the amount of time renter per year?

Some people make it a full time business, competition to hostels. But others are just renting their room while they are away few weeks per year...

#### Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling –If my house is approved to be safe for me and my family to live in, if I can receive friends for free, then it should be the same for paid guests.

I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Melody Durupt  
28 Rainbow St  
Kingsford, Nsw 2032

**From:** Meng Fan <8888.fan@gmail.com>  
**Sent:** Friday, 6 September 2019 5:52 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens on our operations.

As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

**From:** meredith barry <meredith@baskbeach.com>  
**Sent:** Wednesday, 11 September 2019 2:13 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
meredith barry  
75 Prince St  
Mullumbimby, Nsw 2482

**From:** Merideth McCluskey <mccflitt@bigpond.net.au>  
**Sent:** Wednesday, 11 September 2019 2:22 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because I want to give families the opportunity to enjoy our town of Byron Bay at an affordable cost. We are a unique house where we mainly focus on families with young children so they can have the best experience possible in a home away from home.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

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#### STRA Property Register

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Merideth Mccluskey  
8 Cooper St  
Byron Bay, Nsw 2481

**From:** Metta Dewi <metta.dewi88@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:16 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because NSW property rental yield has reduced significantly due to almost unaffordable property. The only way for people to survive paying the mortgage is renting it through short term holiday rental.

Also many suburbs have seen a lot less rental demand and has been vacant for weeks. The only way out for many people is to short term rental their property. However setting it up the first time is not a small amount of money and if you limit the number of days to 180 days, it would be an issue for many hosts to reset up as demand for fully furnished apartment is not as attractive as non furnished apartment.

In addition, I own a cafe business in Surry Hills and from time to time are visited by tourists staying in the short term rental accommodation and I find short term rental would benefit many smaller local business like us.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

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- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Metta Dewi  
102 Miller St  
Pyrmont, Nsw 2009

**From:** M Arnold <atelierstardust@outlook.com>  
**Sent:** Thursday, 5 September 2019 11:17 AM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

Dear Minister,

**Businesses in my area that been able to open up and survive would collapse if big changes were made to the holiday home sector.**

These proposals are in effect, attempting to change the goal posts mid game.

**This will be a DISASTER for small businesses, home owners, retirees and their communities which have grown around the great business and opportunities short term rentals bring to an area.**

**Do not make MORE regulation and onerous changes - the average person is ALREADY struggling to keep up with endless regulation and make ends meet.**

**I oppose the night limits and use restrictions for properties.**

**Restrictions of this kind will result in**

- **collapse of property prices in holiday areas**
- **collapse of small business that have grown to cater to holiday makers**
- **deprive many homeowners of income that they were allowed to have when they purchased their property.**
- **destroy home owners retirement planning.**

**In a word, its UNFAIR and DAMAGING to everyone - government included when retirees are deprived of possible pension-reducing income.**

**If onerous regulations happen, I will have to sell my property - probably at a loss- and this will have severe effects on me and my possibility of retirement in my own home.**

**Why is the government tampering with something that is working so well?**

**Is it to raise more revenue from home owners?**

**Good grief with huge rates and outgoings we only just get by as it is.**

**Leave this fledgling and beneficial industry alone, or you will destroy it.**

Kindest regards,  
MGA Arnold.

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 10:20 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Rob submission 3.0, non Air BNB run

Submitted on Wed, 11/09/2019 - 22:19

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

**First name**

Michael

**Last name**

Bartlett

**Name withheld**

No

## Info

**Email**

[accent@bigpond.net.au](mailto:accent@bigpond.net.au)

**Suburb/Town & Postcode**

Milsons Point

**Submission**

11th September 2019

The Secretary  
Port Jackson Tower  
38 Alfred Street  
Milsons Point NSW 2065  
Sydney, Australia

To whom it may concern,

I am making this submission as the Secretary of the Executive Committee of Strata Plan 49496.

We have several areas of concern with the proposed package on short-term letting that has been released by the NSW Government, with the main areas of concern covering 5 key areas, namely: -

#### Owners' Rights

Residential apartment buildings in mixed use and commercial zones with express prohibitions or limitations on short term letting should have their by-laws respected because these by-laws represent the views of the vast majority of owners.

The key area of concern is that high rise residential buildings such as Port Jackson Tower which was built some 25 years ago, are simply not set up to accommodate short term guests. We have no concierge service or 24 x 7 caretaker or building manager services, which makes dealing with short term guests almost impossible.

Many of our facilities such as our pool, small gym and sauna are surrounded by residential apartments and any increased use of these facilities would disrupt the peaceful enjoyment of these residents.

Port Jackson Tower has only two lifts which is barely adequate for permanent residents let alone short-term renters who would by their very nature put an additional burden on these lifts adversely affecting all other residents in the building.

#### Fire Safety Standards

- (a) Fire safety standards should be more onerous for short-term holiday visitors in high-rise apartment buildings as the threat to life of all residents is increased significantly.
- (b) Fire standards applicable to residential apartment buildings do not address the fire risks of cooking, BBQ's or smoking on balconies which are common problems with short stay visitors unfamiliar with by-laws or local customs.
- (c) Fire safety in residential strata schemes must not be left to self-regulating platforms or amateur hosts as it poses an unacceptable risk to all residents.

#### Security

Security arrangements in individual buildings will be compromised, a large number of extra visitors, many of whom may not be registered with the various platforms, pose significant additional risks to existing residents.

#### Collective Cost of Permitted Short-term Letting

Residential schemes must have authority to levy charges and fees on Hosts conducting short-term letting. The disproportionate cost to owners and owners' corporations from STRA operations (e.g. wear



and tear of lifts, gyms, garbage and other utility areas as well as administration and management costs) means they are effectively subsidising those running STRA businesses.

#### Preservation of Local Government Oversight

Local Councils should have the ability to set and apply zoning restrictions to meet their strategic planning objectives. They should be involved in designing and be part of the compliance and enforcement function of any registration system.

Yours faithfully,

Michael Bartlett  
Secretary, Port Jackson Tower

#### **I agree to the above statement**

Yes

**From:** Michael Bures <bures.michael@gmail.com>  
**Sent:** Tuesday, 24 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** RE; Proposed Regulation and Code of Conduct for AirBnb / Highgate, 127 Kent St Millers Point.

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

September 23 2019  
To whom it may concern,

Primarily this is my objection to the proposal that any organization or STRA could by way of a new regulation control or influence the way I live.

I have the right to object as an 81 year old semi-retired Architect, having worked hard all my life and at the age of 73, sold my house and invested in a new way of life, to live in Highgate, 127 Kent St Millers point rather than fill the ranks of people dependent on handouts and or live in a retirement village.

I have extensive experience in the housing industry, including, seeing what happens quite frequently, to property let short term and not under the direct control of the owners or a body corporate. I am happy to furnish details relating to private and government built and controlled properties in NSW and WA.

Now, regarding my home in a well-controlled building, containing approximately 200 apartments, where I have lived during the past five and a half years, I have noticed how difficult it is to mix with ones' neighbours. This is not due to the physical separation but due to the number of new faces encountered and turnover of tenants already accruing under the present strata rules. I live with this and accept this.

I cannot accept however, the proposed dilution of self-control and reduction to the standard of living of my home.

I keep emphasizing that this IS my home. So far I have not complained about the turnover of new residents and rubbing shoulders with their frequent visitors but I do and will resist any additional influx of short term residents that would not be easily controlled and would further dilute the quality of life in this building.

Apart from my personal issues and emotional reaction above, there are a large number practical and financial matters that would be adversely affected by having to accommodate short term residents and their guests. - In my opinion, should this be allowed, this building in its present configuration could not function. Again, I can submit a list of fact-based matters relating to this, not available from other sources.

Apart from the fact that one size does NOT fit all, I do believe that every stratum must have the ability to control its own destiny according to individual needs of each building, and as determined by the majority of the owners and occupants, and local government - of course. This is as basic as our other hard-won rights in this society and country.

I am sorry, I reject the concept of intrusion and regulation by STRA, and thus, the inevitable, subsequent disruption to our existing carefully crafted and managed individual strata bodies, democratically elected.

Sincerely  
Michael Bures

**From:** Michael <jindrill@bigpond.com>  
**Sent:** Thursday, 5 September 2019 11:45 AM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens on our operations.

I am involved in short term accommodation in a strata complex of 8 units in Albury NSW, 5 of the 8 units are rented out short term,

I own 4 of the 8 units, My 1 bedroom units have a full kitchen, the kitchen has a full size refrigerator & stove, including all pots, pans & utensils to cook up a storm the bedroom has all linen & towels provided, lounge room has couches TV DVD & Wi-Fi , & of course a stocked bathroom.

I promote them as "just bring your suitcase and cornflakes, and everything else is provided"

The building has been used for short term accommodation since 1953, as it was close the old Albury Base hospital.

This is obviously way before airbnb or stayz were even invented, & way before the internet as well.

My clients are Locums, Lawyers, optometrists, chiropractors, pharmacists etc who come to work in Albury for short periods,

Generally for 3 to 4 weeks to cover for someone who is on holidays or on extended leave.

My very valid point is where are these type people going to stay when the new regulations drive me OUT of business, maybe they could stay in a Motel

And stare at a Microwave for 3 to 4 weeks, as it is the only kitchen appliance in the room, (most Motels will not allow guests to cook in their rooms)  
therefore they have to go out to eat every night.

Seriously, where are these type of people going to stay, the shortest residential lease in Albury is 3 months, businesses just cannot afford to rent & supply utilities for the times that they MAY need Locums, I don't think the Government has thought about the working people that need good clean and most importantly affordable accommodation when working away from home.

I imagine that businesses in other regional centres (Tamworth, Dubbo, Orange, Wagga etc.) would have the same problems, needing locums to cover short term staffing, when their people are on holidays or on extended leave.

Please don't hesitate to contact me for further information about short term accommodation,

*Regards*

*Michael Campbell*

*Albury Central Short Term Apartments*

*694 Dean Street Albury 2640*

*Email: [694deanstreet@gmail.com](mailto:694deanstreet@gmail.com)*

*PH: 0428 284 227*

*Po Box 1305*

*Lavington NSW 2641*

**From:** Michael Cohn <micon123@y7mail.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

For many reasons, I host on Airbnb. These are:

I am a 72 year old male (nearly 73) whose earning capacity declines with each passing year. I need the supplemental income to maintain myself and my wife.

Current returns on cash investments at these very low interests rates have played havoc with our retirement.

In addition, our Airbnb activities provide a wonderful and meaningful existence for us - we meet amazing and interesting people who come to stay with us.

We have established real friendships with guests who come back to stay with us.

We enjoy sharing our experiences as migrants to Australia and we take delight in sharing the wonderful things we have found here in Australia.

All the above are important to the quality of our lives and in place of becoming doddering elderly people awaiting old age and death, we are alive each week with new possibilities. Do not underplay the importance of this for hosts like ourselves. As long as we are engaged in meaningful work and activities, we do not risk becoming a burden to our children and indeed to Australia.

We are active in recommending our favourite cafes, restaurants and shops in consequence of which, small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach. However, parts of the current proposals feel unfairly onerous and seem to fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

#### Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Michael Cohn  
128 Clyde St  
North Bondi, Nsw 2026

**From:** Michael Folk <sydneyhomestay1@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host, I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it brings in essential income to help me pay the bills and my mortgage, especially given I am a single person. I am coming to the end of my career, with future work dwindling, and the income Airbnb brings in, allows me to stay in my home and in my community which I love dearly. This brings a level of security comfort and joy in my life, essential qualities to maintain a healthy and full life, and without the income, I would most likely be forced to sell my sanctuary and home of 19 years, which I have worked so hard for during my working life. I also enjoy meeting people across all generations, both locally and from around the globe, enjoying the engagement and perspectives my interactions with guests always bring. This has given me new perspectives on the world we live in, and life itself. I love to share with my guests the special qualities that Australia and my neighbourhood embody, and believe a homestay provides guests with a far deeper insight into our wonderful country than hotel accommodation could ever bring. The relatively modest rates I charge also allow less advantaged people, especially both older and young people to travel the world and experience different cultures. This engages me socially and intellectually, and I have made some wonderful friends through hosting.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism. I believe this to be an important component of my local community of Redfern, with evidence of ever-increasing closed shops in the neighbourhood.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

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the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

#### Environmental Planning and Assessment (STRA) Regulation 2019

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Michael Folk  
8 Rennie St  
Redfern, Nsw 2016

**From:** mhackmanhk@gmail.com  
**Sent:** Tuesday, 24 September 2019 10:03 AM  
**To:** DPE PS STHL Mailbox  
**Subject:** STRA Discussion Paper

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Sir/Madam,

I am owner of an apartment in Highgate apartments in Kent Street and it has been my home for 22 years and it is where I intended to reside into my retirement. This, and many other, vertical villages provide amenity and security, in large part due to us knowing all residents, on our floor particularly, and being

Also we have grown as a family in Highgate, bringing up our children, just as many others are doing now. Infants and children need a quiet environment and to know other children in the building.

Also, with an aging component as well as young families we enjoy (and pay dearly for) use of swimming pool and gymnasium. This is important for a healthy lifestyle.

I wish to express my alarm at any possibility of the lifestyle is seriously compromised as is being proposed. If our home were to be turned into a hotel building, for the profit of non-residents who lease their apartments for short stay holiday makers it would be a complete travesty.

Michael Hackman  
2410/127 Kent Street  
Miller' Point NSW 2000

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Sunday, 8 September 2019 8:57 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** recorded in DPIE subs register, Purple category

Submitted on Sun, 08/09/2019 - 20:56

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Michael

**Last name**

Hayward

**Name withheld**

No

## Info

**Email**

[hayward@brokenhead.net](mailto:hayward@brokenhead.net)

**Suburb/Town & Postcode**

2481

**Submission**

STOP holiday accommodation in homes in residential areas.

Since moving to the Byron Shire 10 years ago I have watched the community slowly disappear. The rental of full homes on Air B & B, Stays etc... has slowly taken homes from the market that were traditionally family's living within the community. We now have very limited permanent rental accommodation and it has destroyed our community.

More than 2,000 whole homes are now permanent holiday rentals and are a continual disturbance to permanent residents. Everyone is in 'holiday mode' and it has become a very unpleasant place to live. Why cannot residential areas be residential areas and tourist areas tourist areas?

It is time to say enough is enough and limit the amount of time whole homes can be part of holiday rentals.

Grow the number of hotels, motels, lodges, caravan parks etc.... in non residential area and allow the community to return.

**I agree to the above statement**

Yes

**From:** Michael Karpa <info@jgfarah.com>  
**Sent:** Wednesday, 11 September 2019 2:22 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Michael Karpa  
1 Missenden Rd  
Camperdown, Nsw 2050

**From:** Michael Keene <mkkeene@bigpond.com>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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I host on Airbnb because it helps support my retirement

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

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Thank you for reading my submission.

Regards,  
Michael Keene  
19 Sheridan Cres  
Stanwell Park, Nsw 2508



**From:** Michael Kerr <michaelkerr2104@outlook.com>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it allows us to speculate on the property market at the same time as a negative geared asset for tax time. It was an easier way to upgrade our residence as we moved out of the property to create the Airbnb.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

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I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing

- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Michael Kerr  
15 Inner Cres  
Bowenfels, Nsw 2790

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Monday, 9 September 2019 8:21 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Tessa Submissions, recorded in DPIE subs register, Purple category

Submitted on Mon, 09/09/2019 - 20:21

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Michael

**Last name**

Murray

**Name withheld**

No

## Info

**Email**

[mikemurray100@hotmail.com](mailto:mikemurray100@hotmail.com)

**Suburb/Town & Postcode**

2481

**Submission**

To whom it may concern.

I have many concerns with regards to affordable accomodation in the Byron shire area.

A limit on Airbnb rentals would be welcomed by myself to hopefully discourage Airbnb rentals and bring back homes to the rental market.

Demand for rental homes in the area have always been in short supply.

Also a positive for Byron is the growing number of people being employed on the Industrial estate with many new business's starting up over the last few years.

Hence these employee's need local accomodation which will reduce commuter traffic coming in from out of town.

I'm a home owner in Byron Bay and have used Airbnb on a few occasions but would never do it long term as i respect other neighbours.

Sometimes there needs to be a seperation between business ie Longterm Airbnb and basic needs for the local community ie affordable housing.

I support a limit on Airbnb which needs to be regulated by local council.

Regards

Michael Murray

**I agree to the above statement**

Yes

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Tuesday, 10 September 2019 9:06 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** recorded in DPIE subs register

Submitted on Tue, 10/09/2019 - 21:06

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Michael

**Last name**

Rose

**Name withheld**

No

## Info

**Email**

[michael.rose805@gmail.com](mailto:michael.rose805@gmail.com)

**Suburb/Town & Postcode**

McMahons Point 2060

**Submission**

I only comment in relation to strata living in Sydney.

As a lawyer I observed disputes regarding a strata owner having six people in a small two bedroom inner

city strata apartment as short term boarders. The Strata Roll was not up to date as to STRA occupiers. Such conduct put added pressure on the one lift during busy periods.

Some form of registration of persons present in a STRA lot is required and some by-law permitted to keep registration or strata roll up to date and reasonable method for such by-law to be enforced.

The local council could also be given some powers to manage complaints about abuse of STRA.

Also I live in a security strata unit with mainly one bedrooms and one lift. Security keys should be kept to two per one bedroom otherwise security can be compromised with STRA with keys taken and the owners corporation to have valid by-laws to enforce a fee to provide additional keys to STRA lot. Also have valid by-law to state how many people should stay in STRA in a one bedroom lot.

**I agree to the above statement**

Yes

**From:** Michael Sams <mikesams2211@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

#### STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

#### Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Michael Sams  
27 Irrubel Rd  
Newport, Nsw 2106



Michael Smith  
26 Bunarba Road  
Gymea NSW 2227  
28 August 2019

**A letter from a concerned small business relating to proposed  
Short Term Rental Accommodation (STRA) regulations**  
(Formal Submission Attached)

The Director, Housing Policy, NSW Department of Planning, Industry and Environment  
*(responsible for the proposals)*  
Councillor Amanda Findley, Mayor Shoalhaven Council  
*(mayor local council)*  
Councillor Annette Aldrick  
*(councillor for ward 1, Berry)*  
Tourism Shoalhaven  
*(responsible for getting more people into the region)*  
Gareth James Ward, State Member for Kiama  
*(state member covering Berry)*  
Gladys Berejiklian, Premier NSW  
*(Premier covering Berry)*  
Fiona Phillips, Federal Member for Gilmore  
*(federal member covering Berry)*  
Mr Anthony Houghton, President, Berry Chamber of Commerce  
*(leader in enhancing the Berry economy)*  
Michael McCormack, Leader of the Nationals  
*(representing regional Australia)*  
Scott Morrison, PM and Member for Cook  
*(my local member, and Prime Minister for Berry)*  
Pauline Hanson, Leader of One Nation  
*(interested in regional communities)*  
Eacham Curry, Director of Corporate & Government Affairs, Homeaway  
*(vested interest in the viability of the industry)*

Dear interested parties

I am working on the assumption that you are aware of proposals by the NSW State Government to regulate the STRA industry. In concept a well-intentioned idea, in draft a very damaging set of proposals. This is likely to be true for my small business, but more importantly, and why you are all copied, damaging for regional Australia. Critically the proposals also fail to address many of the objectives of deploying them in the first instance.

Attached is my submission to The Director, Housing Policy, NSW Department of Planning, Industry and Environment – as at this stage that is all that is required. It's a long paper and for people with busy agendas I'd asked that you just read the first two pages. From this you might get a perspective of the significance of the issue and the dramatic consequences of the poorly crafted proposals.

Of course, I am confident that the Director responsible will read it in its entirety and reconsider, thus negating the need for me to bring these matters to the attention of the broader community.

Thank you in anticipation

Michael Smith

# Submission

## Proposed regulation, instruments and code of conduct for a state wide planning framework for STRA

### Executive Summary

Whilst supportive of the overarching aims of the proposals to improve the STRA industry, I am not supportive of a number of specific measures which I believe are ill informed, will be ineffective and will result in substantially more damage to hosts, regional economies and ultimately communities than has been considered. It might be that the proposals work in city and urban areas (I am not qualified to speak on these), but they will unquestionably damage regional New South Wales – communities already struggling under a number of environmental and economic challenges.

In this submission I refer to specific clauses and proposals and document reasons why I believe they are ineffective, ill-informed and/or damaging. I set out to also estimate the likely cost impact on the community of Berry (NSW, South Coast), the likely impact on my well established and well regarded business, and the damage done to guests who adore the experience of visiting regional NSW and staying in accommodation that is secluded but close to amenities.

It also occurs to me that the aims of noise reduction and guest safety could be resolved by two very simple measures that would negate the need for such detailed regulations and processes. Firstly, in relation to noise require the installation of an active internet connected noise metre. Breaches could be tracked and documented and consequence if appropriate. Second, in relation to the dangers of environmental fire and flood – mandate that STRAs must remain vacent on days where high danger warnings are issued. This would better meet objectives and negate all the madness currently suggested

Perhaps the one measure not considered by anyone though is the societal benefit of offering humans a chance to experience a regional NSW setting. Its good for the soul to escape to the hills outside of Berry, and over 4 years this is something that nearly 4000 people have enjoyed in my holiday home. A quick google or social media search of Eagles Rest will reveal the happiness that happens here and the joy people feel compelled to share after staying. The submission doesn't attempt to quantify the life experience losses that future guests might not have – and this is completely contrary to the aims of government, let alone the aims of NSW and Shoalhaven Tourism I'd have thought?

So confident am I about these views, as shown through this document covering the small ecosystem around Berry on the South Coast, that I believe the proposals must be amended ASAP before substantially and perhaps irreparably damaging business and communities in NSW. The people of New South Wales don't need a repeat of the other similarly well intentioned but disasterously executed over government that will always be remembered as the Greyhound fiasco.

Further consultation and amendment is immediately required.

## Introduction

I would like to start by saying that I am supportive of the range of instruments proposed at this time. No specific instrument needs to be withdrawn and none added – although significant amendment is required before they are deployed

STRA is a business (a very important one to me), a big industry and also a vital component of the community in which mine operates. That the less reputable in the industry might be brought into line by these proposals is a positive step forward for the industry and the community. That said, the proposals dramatically impact on reputable and long-standing hosts and I find a number of the inclusions problematic, ineffective, damaging and some of them ill-informed.

As I draft this response I seek to be guided by your principles, which I have summarised below –

- to overcome problems that arise in communities;
- enabling local economies to continue to prosper;
- protecting communities from anti-social behaviour, managing or avoid increased noise;
- hold hosts accountable for their properties;
- protect guests from false information; and
- manage fire and flood risks at the highest level

In reading the set of documents I am left with the feeling that the motivation behind the proposals is not really focussed on communities (perhaps more on neighbours), and actually creates a situation that will risk bringing to an end my business and many like it. I'd also assert that it will impact communities in a much more substantial way than the mooted gains. I have been unable to find the claimed 'damage' done by SRTAs in regional areas (either to neighbours or hosts) – perhaps if this was quantified it would be a useful exercise to business case the proposal on a traditional cost/benefit analysis – something I believe is a screaming omission.

I also believe that the measures suggested are completely inconsistent with the aims noted above – and whilst I will cite the reasons as I address each document, the proposal on numbers of guests (per room and in total) have no relevance or consequence on the above aims. I presume this measure is meant to be about noise reduction – but it has nothing to do with numbers and everything to do with behaviour. 4 poorly behaved people can make much more noise and cause much more neighbour distress than 20 good responsible ones I would assert.

All in all, I believe the proposals will completely fail to deliver the outcomes sought, will cause many STRAs to go out of business and will drastically hurt communities. At best these are poorly conceived attempts to address some issues, more likely they are actually crafted words to harm business and individuals. It reminds me of similarly other well-intentioned legislation (Greyhounds) that was disastrously deployed by the state government in response to a genuine issue because it was ill conceived, most probably not well balanced in its intent and rushed - resulting in significant damage and massive costs to re-instate.

I trust that this submission is read in full and that the proposals are substantially amended before they become law, as failure to do so will have catastrophic consequences for a large percentage of hosts, but arguably more importantly for a large number of regional communities.

I will now set out my comments in the order of each proposed document



## **Discussion Paper – A new regulatory framework**

### **Register**

I am fully supportive of the register of properties. Whilst many STRAs are listed on the industry sites like HomeAway and Airbnb, a great number are not given the fees these businesses charge. These fees can variably be between 4 and 10% (charged both to owner and guest), and the placing of a further burden on these organisations will only result in them passing these added costs on via higher fees – which will ultimately be passed to the guest.

I pay GST and tax and in both instances my property is known to the federal government. This would seem like the right place to start (a base dataset) and I believe it's incumbent on the state government to develop the register much in the same way as it manages drivers or boat licenses. Why not require an SRTA license – at no or nominal cost (and if you really want compliance maybe at some benefit to owners) that can be the unique code of a renter/property required to be logged on all places the STRA is advertised or promoted. I am very happy to complete an online set of questions about my property that will help inform government (and potentially renters) about my property for this purpose if more information would be required.

The second point is that I believe perhaps up to 20% of STRAs are not listed on the traditional platforms, managing their own web pages, working within social media sites such as Facebook, or simply operating under word of mouth. A register developed by the platforms will not address this significant segment of the STRA community

### **Timing**

I believe that these proposals will do more damage than good – you ask when these should come into effect – my honest answer is at this stage never. You need far more consultation with all participants, but specifically discussion direct with owners (not via the portals as they don't know at all what happens locally), and arguably with the many Chambers of Commerce around the country who often have a better perspective on economic viability of local communities than residents. I also believe that the motivation for this is largely city/urban, although the impacts will be felt much more significantly regionally. Given the governments articulated commitment to regional NSW, and the challenges that these communities face, it is complete madness to implement something like this at this time.

### **Previous consultation**

You note who has been consulted but the list is incomplete. You should also have consulted –

- local Chambers of Commerce;
- businesses that support the many SRTAs and earn a sustainable living from same;
- guests – nothing really has been asked of the guests who enjoy large properties or those on prone land – surely, they should have a voice
- hosts that are likely to be impacted by proposals (size limits and fire/flood prone). It's impossible for me to see how these hosts could be anything other than vocally unsupportive – the claim in your document that hosts are largely supportive is entirely misleading

### **Proposed STRA SEPP & Key Changes**

In response to the points made about what the SEPP will deliver, I have only commented where I believe the statements to be incorrect or inaccurate or lacking of clarity/substance –

- the proposed exemption pathways are too limiting and overly defined. By its very nature an exception should be granted where a host has done all measures to provide for host safety, and if appropriate, such measures are concurred with by someone qualified in ensuring safety in moments of fire.
- Introduction of bushfire and flood prone land in this document is presumably to protect the safety of guests, but such arbitrary measures and the resulting consequences are not logical, are counterproductive and fail to offer any heightened safety at all. The definition of a BAL (for example) is not entirely meaningful when it comes to risk. A property at low BAL but poorly maintained and with high risk exterior items is potentially more dangerous than a well-maintained higher BAL. Things like annual land and undergrowth clearing, ready access for fire services, evacuation plans, blackout periods of renting during catastrophic fire warnings, guarded gutters, exposed flammable items are all examples of more significant measures than BAL alone. All of these I have or would be happy to deploy. They were in fact suggested to me by a friend who is a firefighter in the Blue Mountains. Exceptions need guidelines around genuine safety, not hard numbers that offer no real comfort. As a result, I'd assert a well-managed BAL40 is safer than a poorly managed BAL29 – and this makes the proposal flawed. Additionally, there is no discerning in the guidelines between land that hasn't had a fire for 100 years vs land that has them every year. Codes put in place that would force business closure based on a 1 in 100 year event (when other measures can better deliver the required outcome) is again madness. I believe the same to be true for flood prone land. I would contend that the arbitrary measure completely fails to protect renters on this basis and discriminates against good hosts. As such, a case by case approach is required for exceptions whereby an accredited fire company / or the local RFS can review and approve.
- In relation to fire, whilst I am unaware of my particular BAL (although I know the land is marked as fire prone based on purchase documents), the current complete view of regulations make it impossible to comply. My land is designated rainforest and is protected under an environmental measure that precludes clearing. I'd be happy to clear to any distance to comply with these regulations, but other regulations mean I cannot – that is bureaucracy at its finest! Moreover, the closest vegetation is actually on a slope on my neighbour's land – and I doubt I can obtain a requirement to clear from the RFS (nor do I actually think it's necessary) – again existing policy and practice coupled with these proposals makes any outcome other than closure a distinct possibility
- I believe that these new proposals could apply to new (perhaps not existing) STRAs – as hundreds, perhaps thousands have been operating with many other safety measures (such as those mentioned above) forever. In this regard I would be curious to know how many individuals have been harmed in STRAs that the government is aware of (due to fire or flood) that requires the introduction of such arbitrary measures that will result in significant business closure in regional areas
- As an additional and alternative measure – could you not require hosts to advise (or indeed require) guests to evacuate in certain circumstances. This is so simple and fully effective – it strikes me as almost absurd that it hasn't been considered?

- The recommended standard of a maximum 12 (or 2 people per bedroom) whichever is the lesser – will not reduce noise and will cause business and community damage (for reasons documented in attached financial estimates). As previously mentioned, 4 people playing loud music all night are much more antisocial than 20 people who gather for an 80<sup>th</sup> birthday. There is therefore no reasonable basis to limit STRA guest total numbers
- If this specific proposal is based on a desire to reduce noise, then perhaps set a noise level requirement around times and require it to be measured. Such a proposal would also provide clear evidence in the event of any complaints – and there are also relatively inexpensive devices that deliver exactly this outcome
- The recommended standard of a maximum number of people per room also makes no sense at all. Many STRAs have rooms that have multiple beds – in fact as a guest I have sought them as they are ideal for large family gatherings where multiple children share a space (see comments from guests in attached notes). I have a large space like this at my property that is regularly used by children in family groups. If motivated by noise I'd refer to the previous point. If motivated by safety, a simple addition of some internal walls (in my instance I could do that) will overcome this requirement, but would not provide any gain and would arguably make evacuation (in the worst-case scenario) harder and therefore more dangerous
- The installation of extra and higher performing fire alarms will likely cost me \$1500 – but I agree that it heightens the safety of guests and as such I am supportive of the measure. If the Government however is genuinely concerned for guests, small business and regional communities though – perhaps the State Government can abate some of this cost against the exorbitant land tax cost that it levies on me annually (as a result of this being my second property). As an aside, has the government factored in land tax loss if properties such as mine are unable to be SRTA and return to first home owners?

## **Strikes**

The proposed Part 7 of the code regarding strikes being recorded is a little vague to me. You propose 2 strikes in 2 years will result in the STRA being removed from the industry booking sites – although go on to say that guest behaviour can cause a strike to be recorded against a host. How can the host be held accountable for actions entirely beyond their control? By all means strike the guest, by all means set a fee to be paid by the host (which can be included in bonds and held in such cases), but you cannot penalise a host with a strike who always seeks to act with the best intention. If, however the host fails on a directly controllable element then by all means record a strike.

## **Draft Code of Conduct**

### **Record keeping requirements**

You make reference in the proposal at 5.2.7 to the need for booking platforms to keep full records for 5 years in a readily producible form. That might be possible for HomeAway and Airbnb, but some 30% (and growing) of my bookings come from my own website or via word of mouth (no platform at all but my details passed on by previous guests). Such record keeping can possibly be included in the platforms (although they would be resistant, I suspect) and is extremely difficult in these instances.

## **Exclusion Register**

At 5.4.11 you state that excluded guests must not be able to book. This might be easy on the booking platforms but how do you propose I do this for direct bookings. I can foresee minor name changes, booking made in the names of the spouse, etc. Plus, I won't have interoperability with the exclusion register so looks to me to be an onerous manual process which seems fraught with danger and error in the form of simple human mistakes

## **Complaints**

Although there are many items in the code, the one that is probably most likely to generate complaints is that about noise and/or antisocial behaviour. It strikes me that noise is a variable concern (city vs regional, time of day, etc), and as such difficult to assess a standard against. Would it not be much more straightforward (as asserted previously) to require the installation of a web connected noise meter where levels can be recorded and saved. This is not then a case of opinion but rather a matter of fact that can be independently reviewed.

I also would suggest that a complaint should first be raised with the owner – such that they can immediately address the concern. As I read this proposal the first a host might know of a complaint is when its registered. In four years, I have had one concern raised by a neighbour – I immediately addressed it and provided a couple of bottles of wine as an apology. This staged process should always be afforded before a bureaucratic one, and should be outlined in the code

## **SEPP**

I refer to comments made in response to the discussion paper about the proposals regarding flood and fire. The measures are extreme and actually fail to protect anyone – but rather will damage business (closures), communities (less visitors and less spending and less jobs) and guests (lost experiences). These measures I understand were put in place regarding new buildings originally – I'd support them being put in place potentially for new STRAs, but suggest existing STRAs be reviewed on a case by case basis – as asserted previously

Michael Smith  
26 Bunarba Road, GyMEA  
Owner – Eagles Rest on Woodhill  
[www.theeaglesrest.com.au](http://www.theeaglesrest.com.au)  
[mgsmith@outlook.com.au](mailto:mgsmith@outlook.com.au)  
0411142444



# Attachment One

## Estimates on the financial impact of these proposals

I have used a crude review of the HomeAway platform to make the following estimates for the community in which my property operates (Berry, NSW). The numbers are estimates (and I have outlined the basis for calculation should you care to adjust and do your own numbers).

- 83      Number of STRAs within reasonable reach of Berry township (10km radius)
- 7        Number of properties that sleep more than 12 (1 at 35, 1 at 20, 3 at 14, 2 at 13)
- 32      Number of properties estimated on fire prone land (based on map overlay)
- 16      Number of properties estimated on high BAL (Berry surrounded by forested mountains)

Based on these numbers, I estimate that if these proposals are implemented, Berry will lose approximately 25 properties through closure –

- 16      Due to high BAL
- 4        Greater than 12 guests who cannot make a viable business at a limit of 12
- 5        Due to costs associated with compliance becoming too onerous and not viable again

Now if we assume the following –

- 10      The average number of guests staying at the STRAs likely to close (some more / some less)
- \$100   Amount spent per guest/stay in the community (café, lunch, dinner, supermarket, donuts)
- 1        Day of cleaning per week per property
- 3        Days on maintenance per month per property (mowing, plumbing, electrical, water, etc)

Then the impact of the new proposals in Berry alone will be –

- 250 less guest beds at any given time (in a community that is already short of beds and would like more). This may put at risk some of the regular community events
- \$25000 community spending lost every week - \$1.3m less spending in Berry per annum.
- 5 local cleaner jobs lost – heightened unemployment and associated social challenges
- 4 support jobs lost – heightened unemployment and associated social challenges

This is massively understated as I have not included some STRA specific activities (such as catering) – that are just too difficult to quantify (but you might want to include some of the following businesses that enjoy revenue from these same (potentially closed) STRAs in further consultation –

- catering companies (visited my property over 20 times last year);
- event planners;
- vegetation management businesses;
- sanitation, septic and water companies (over \$1000 pa);
- pest services (\$500pa);
- firewood suppliers (\$2000+pa with Ryans Turf alone);
- council nursery (plant expenditure over \$500 last year); and
- local electrician and plumbing

I have left out of the analysis all the spending that closed STRAs make on goods to support their business. Spending last year by me – interest cost and taxes aside – was about \$120,000 and this is largely in the extended local community and is fully at risk under these proposals).

And I am just one STRA!

So, the consequences on Berry I believe are extreme – I would estimate up to 20 jobs lost and with the significantly reduced spending related business viability will be challenged (cafes, restaurants, and the many unique shops that make Berry great). And that is just based on lost spending – if you add the lost beds every week, the events held in the town (Fairgrounds, vintage cars, bikes, markets, Scottish festival, etc) might become marginal as not enough people will be able to stay. This also has a flow on impact to the very strong, vibrant and growing wedding business that has been built up in the community over many years.

And this is just one regional community. Multiply it across NSW and the cost will be hundreds of millions and the impact on regional NSW unbelievably damaging.

# Attachment Two

## **Feedback from guests who would be excluded by these proposals (>12)**

**Sandra M – 17**

*Just spent an amazing week at Eagles Rest. This was our second visit to this beautiful property. 2 years ago, when we visited it was for my brother in laws 70th and this time for one of our 5 son's wedding that was at Willow Farm. Both times the communication was excellent with the owner Michael and the house was immaculate on our arrival. Such a wonderful place for a gathering with either family or friends. Would highly recommend it for an intimate wedding venue as the views are amazing and a very private setting. I have always dreamt about a week away with all our children and grandchildren and Eagles Rest fulfilled that dream. There is so much room for everybody. There are lots of areas to sit have some quiet time if needed. Watching the children play in the large level yard was great. We all had so much fun with hoola hoops bat and ball games footy and soccer and tree climbing. We have talked as a family about making this a yearly event as everyone loved it. My husband and I have rented many holiday homes over the years and this is by far at the top of our list!! Thank you again Michael*

**Carolyn H – 19 Guests**

*The photos of Eagles Rest do not do the place justice, it is a magic location and a beautiful house. We had 5 families with kids ages ranging from 9 - 17, everyone (adults included) were very happy with the space both inside and out. Great fires to enjoy during the cooler afternoons and evenings. The kitchen had a number of electrical appliances, like sandwich makers, electric fry pans and woks and two microwaves, which made up for the size of the oven. That would be our only negative comment from the whole weekend, it is a shame in a house so big that the oven is only the standard size. But if you know that ahead of time, you can plan cooking for the masses accordingly. Would highly recommend Eagles Rest as a place to get away for a break.*

**Kim Q - 20**

*My family stayed at this lovely place for my son's wedding. The wedding wasn't far away from the house.*

*We all had a fantastic time and Michael was very accommodating (especially seeing we had a few extra's). It would be nice to spend a whole weekend there where I don't have to run around - and the view was just amazing.*

*I would fully recommend this place - you won't be disappointed.*

**Maxine L - 15**

*Our stay was terrific. Our group was 3 generations with 9 children from 7 months to 6 years. Everyone was well catered for. The children could play on the deck or lawn while the adults could relax and watch from the ample seating. Would love to come back again*

**Robyn B - 19**

*The property proved so suitable for a large family gathering - 19 in all including grandparents, children and spouses, and grandchildren. all could find their own respective spaces to relax. In*

*addition, the town of Berri proved delightful and Gerroa provided the attraction of great water activity.*

*The only comment for improvement (as already made to the agent) is that the upper sleeping area or garage loft needs natural ventilation which should be readily provided by installation of opening windows.*

*However, overall, we all enjoyed a wonderful and very different escape! Thankyou!*

**Simon B - 20**

*We rented Eagles Rest to use as accommodation for some of our wedding guests. Not only was the view spectacular but the property easily housed twenty in comfort. Michael was super helpful, and very quick to respond. Will definitely be back!!*

**Perin B - 15**

*We were looking for accommodation to suit a large group of 15 people and we were fortunate to come across Eagles Rest. Instantly drawn to the sense of seclusion, privacy, the large homely style accommodation and not to mention the picturesque views. The property did not disappoint boasting large living spaces, amazing gardens and views, comfortable bedding and all the creature comforts to ensure a relaxing and stress-free time away. The property was located a short walk to the start of Drawing Room Rock bushwalk and lookout (the views at the top were breathtaking) and a few minutes drive to Berry. Highly recommend Eagles Rest for anyone who wants to relax, unwind and reconnect yet still having the bonus of being close to shops, restaurants, amazing walks and the beach.*

**Margaret L - 16**

*This is a most beautiful house with glorious views over the escarpment, rolling hills and sea. Our first morning was beyond perfect as the sun shone on the balcony and we opened the folding doors to sit in wonder at what we could see. The good weather did not last for the whole stay, but that memory is enough. The last day the view was gone and we had atmospheric mist surrounding us.*

*The accommodation was perfect for us. When the weather deteriorated, we used both indoor and outdoor fires and with so many areas to move to for the different age groups it could not have been better. Our seven teenagers (all girls) adored their loft, and we all made good use of the outdoor and indoor games.*

*The adults all had lovely bedrooms, and the main living area was a delight for our shared meals. The big celebration was catered for by Duck Duck Goose Catering, who did a fantastic job - all age groups enjoyed the superb meal.*

*We are all keen to return and enjoy this wonderful house again.*

**Gay W - 16**

*Our whole family gathered, from the 80-year-old (having a birthday) down to the 3-year-old. We all found something to do. So spacious, but still warm and cosy. We particularly enjoyed the fires, inside, and out.*

**Josh L – 20**

*Each year I take my team away for a retreat to relax, plan and build team unity for the year ahead. It's often a challenge to find a place to accommodate a team of our size, yet Eagles Rest fit all of us very comfortably and was the perfect environment for us to achieve our aims. The home was in excellent condition, with spectacular views and plenty of space for us to relax and enjoy our time away (the pictures simply do not do the home justice!).*

*Michael was so helpful and made planning for the retreat a breeze. We will definitely come back if we have the opportunity!*

**Trudy C – 18**

*We have just celebrated my 70th birthday with our family, couldn't have had a better house or location, Michael thank you for sharing this amazing house which we thoroughly enjoyed*

**Eagles Rest–**

- **has over 60 five-star reviews;**
- **one informal complaint by a neighbour that I immediately addressed;**
- **has had no safety issues;**
- **provides a sensational experience for guests;**
- **provides me a business and a job;**
- **provides jobs in the community; and**
- **contributes significantly to the Berry community and economy.**

**Please reconsider urgently before all this is lost.**

# Attachment Three

## Your questions with responses summarised from the submission

Topic	Question	Response
Planning instruments	1. What is your view on the form of and provisions in the STRA SEPP, Regulation and Safety Standard?	Room guest limits, overall guest limits, fire and flood prone arbitrary measures are ineffective and need to be amended
	2. Are there any elements of the draft instrument that are open to misinterpretation or require further clarification?	No
	3. What are your views on new policy elements relating to days, flood control lots and bushfire prone land?	Extremely detrimental and damaging to hosts. Huge impact on communities. Limits guest experiences and provides little extra safety outcomes
Code: Industry participants' obligations	4. Are the general obligations for industry participants adequate? If not, what other general obligations should be considered? Why?	Not sure how you address independent participants
	5. What types of STRA information will be useful for the Secretary to collect to inform the further improvement of the Code and the STRA regulatory framework? Why?	Speak to hosts affected. Speak to fire experts. Speak to businesses in the ecosystem. Talk to Chambers of Commerce
	6. Are the specific obligations on booking platforms, letting agents, hosts, guests and facilitators in the Code adequate? If not, what other obligations should be considered for each of these industry participants? Why?	Think perhaps over regulated
Code: Complaints	7. Is the complaints process detailed in part 6 of the Code sufficient? If not, what other matters should be considered or set out in the process? Why?	There should be a process involving host and complainant documented, then perhaps mediation, then consequences
Code: Compliance and Enforcement	8. Are the grounds for recording a strike fair and reasonable? What other matters (if any) should the Commissioner consider when deciding whether to record a strike? Why?	How can hosts who act in best interests at all times be held accountable for a guest

	9. What are potential ways to facilitate industry participants' access to the exclusion register while limiting potential privacy impacts? What factors should be considered?	Super difficult – believe guests will modify minor details to avoid being excluded
	10. Is the review process clear and sufficient? What other matters (if any) should be considered? Why?	A stepped process of complaint escalation as mentioned
Code: Penalty notice offences and civil penalties	11. Are the proposed penalty notice offence and civil penalty provisions appropriate? What provisions should or should not be identified as penalty notice offence and/or civil penalty provisions? Why?	Perhaps bonds need to be set at a minimum level to cover fines incurred by guests
Amendment Regulation: Prescribed classes of STRA industry participant	12. Does clause 22B(1) appropriately capture end to end property management services that specifically service STRA properties? Why or why not?	Yes
	13. What other organisations or persons should be prescribed classes of STRA industry participants (if any)? Why?	Partners like catering, event planners, etc interact in the ecosystem and could be related and included (e.g. – a caterer may create excess noise?)
Amendment Regulation: STRA industry participants excluded from Code of Conduct	14. Is it appropriate to exclude the STRA industry participants set out in clause 22C? Why or why not?	I cannot comment on this but it seems discriminatory to require certain conditions on STRAs and not similar accommodation businesses
	15. What other STRA operators (if any) should be excluded from being covered by the Code? Why?	Long standing businesses of good reputation and record. A grandfather clause. Arguably, also regional STRAs
Amendment Regulation: Appeals against listing on exclusion register	16. Is the appeals process clear and sufficient? What other matters (if any) should be considered? Why?	I think it lacks evidentiary information. There is a lot of anecdotal claims – would seem better if there were mechanisms (like sound metres) that provide fact

Amendment Regulation: Fees and cost recovery	17. Which industry participants should contribute to the cost of administering and enforcing the Code? Why?	The government – these are all new requirements. Particularly if the STRA pays un exempt land tax rates – the government is creaming revenue and adding cost – all of which will ultimately be paid by guests
	18. How should costs be apportioned across different STRA industry participants? Why?	Guests will end up paying regardless of the split.
Amendment Regulation: Penalties	19. Is the proposed penalty notice offence amount appropriate? Why or why not?	You picked a number – seems enough to be an encouragement to comply
Proposed industry led property register	20. How can industry be organised to develop and manage the registration system?	Use Service NSW and require a license to operate an STRA
	21. What would be the costs to industry in establishing and maintaining the register? How would industry propose to meet these costs?	They will be significant and will be passed through. No idea how much
	22. What role should the Government play in developing or overseeing the register, if any?	It should be a government obligation
	23. Are there other outcomes a register should deliver?	How will you recognise independent operators
	24. How can the approach ensure registration applies to all STRA operators, regardless of how the property is advertised for rent?	Make it LAW – like a driver's license
	25. What audit and verification processes would be needed to ensure accuracy of data?	No idea – really difficult – maybe collect audit like guest feedback to validate accuracy
	26. Should there be separate or additional penalties for failure to register? If so, which industry participants should they be imposed on?	How will you ever know - unenforceable
	27. What information should the register collect? Why?	Location, address, basic details
	28. What role should different industry participants (e.g. hosts and booking platforms) play in the registration process?	Can be contributors based on existing data held



	29. What role should Government play in the registration process or providing information for the register?	Should gather from all existing sources (local and national governments) and start the process
	30. Should any information on the register be made publicly available? If so, what information could be made available and why?	Why not all – except personal information of hosts beyond name and contact email or number
	31. Should industry be required to report registration information, including number of stays (days), to Government and/or local councils? If so, how frequently? Why?	This data will be incomplete and inaccurate but gather it if you want
	32. Should any information on the register be made publicly available? Why?	As above – why not all
Commencement of regulatory framework	33. How much lead time would industry need to develop and establish the proposed STRA property register? Please provide reasons.	I think you should go with the license idea – it will take at least a year
	34. When should the STRA regulatory framework start? Please provide reasons.	Never as is – it needs significant amendment. After amendment – sometime next year?
12-month review of regulatory framework	35. Do you support the proposed scope of the review? What additional considerations might be necessary?	I think it is ill informed and ineffective – nothing more, arguably less
	36. What data sources could the NSW Government use to inform the review? How can industry and councils assist with data collection for the review?	Speak to businesses – and try to see the full scope of the proposed measures. Regional is poorly addressed with these measures

**From:** no-reply@planning.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Tuesday, 3 September 2019 9:04 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** recorded in DPIE subs register, Purple category

Submitted on Tue, 03/09/2019 - 09:02

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

**First name**

Michael

**Last name**

Smith

**Name withheld**

No

## Info

**Email**

[michaelgordonsmith@optusnet.com.au](mailto:michaelgordonsmith@optusnet.com.au)

**Suburb/Town & Postcode**

Woodhill, 2535

**Submission file**

[submission---stra.docx](#)

**Submission**

Hi

All of my comments are contained in the attached submission. Please confirm receipt

Thanks

Michael Smith  
0411142444

**I agree to the above statement**

Yes

**From:** no-reply@planning.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Wednesday, 4 September 2019 6:02 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Purple category

Submitted on Wed, 04/09/2019 - 06:02

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Michael

**Last name**

Sperling

**Name withheld**

No

## Info

**Email**

[mike@bilpinlodge.com.au](mailto:mike@bilpinlodge.com.au)

**Suburb/Town & Postcode**

Bilpin

**Submission**

To the dept of planning and the Govt. I own a short stay house in rural NSW. If you intend/do introduce tougher rules & compliance regime on short stay homes that's fine. But you must go ahead and implement a set of rules that we can work with. Stop talking about what you'll do. Go ahead and do it.

Protection from bullshit complaints from neighbours is most important. Nobody wants so-called party houses. But jealous/crazy neighbours making unfair & unreasonable complaints must not be permitted to shut down a holiday house.

**I agree to the above statement**

Yes

**From:** Michael Sribney <mike@mike.com.au>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

## Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Michael Sribney  
29 Dangar St  
Randwick, Nsw 2031

**From:** Michael touma <toumamp@bigpond.net.au>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because I am a self funded retiree and rely heavily on holiday rental income at our holiday house in Copacabana to cover outgoings and general living expenses

The Airbnb host community depends on hosting as an economic lifeline to help us pay the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

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Thank you for reading my submission.

Regards,  
Michael touma  
14 Garnet St  
Killara, Nsw 2071

**From:** Michael Trinh <cityfullstars@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

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Thank you for reading my submission.

Regards,  
Michael Trinh  
32 Duke St  
Canley Heights, Nsw 2166

**From:** Michaela Coulson <michaela@damien.com.au>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

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Thank you for reading my submission.

Regards,  
Michaela Coulson  
17 View St  
Wollongong, Nsw 2500

**From:** Michele Jackson <nowrashortstay@dodo.com.au>  
**Sent:** Thursday, 5 September 2019 3:34 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW  
  
**Importance:** High

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens on our operations.

As a responsible operator in the NSW South Coast, mainly Nowra, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. **However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will not only place an important holiday tradition at risk but also will narrow the choice or lack of temporary accommodation for large companies which have large and long term work projects in relative areas and will also deprive many holiday homeowners of income they have come to rely on.**

**I have had on numerous occasions over the years, many large companies relying and reserving from 3 to 6 months at any one time for projects in the south coast area but also for work at HMAS Albatross where a lot of subcontractors require long term accommodation and may I say navy personnel families as well.**

**Restricting the freedom of choice in lodging or accommodation and for shorter or longer temporary stays will create an unstable and unworkable situation at both ends.**

I have been operating since 2007 and over the years have seen an increase amount of not only holiday makers but increase of work projects in the area.

**By narrowing the choice or the lack of freedom of operators and users will reduce the economy and tourism in any such given areas which local councils and communities rely on.**

Kind regards  
Michèle Jackson  
Manager/Operator  
[www.nowrashortstay.com](http://www.nowrashortstay.com)  
Mobile 0422 965 699  
ABN 66 924 350 090



**From:** Michelle rakos <michellerakos@gmail.com>  
**Sent:** Thursday, 5 September 2019 5:44 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens on our operations.

As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

Also, limiting the number of guests per bedroom makes no sense as sometimes there are large families with young children who all wish to sleep together. Saying they can't would then have to translate across to the use of hotels would it not? Because we have all stayed with our families all together in hotel rooms since we were small children. That would be the alternative for these families, then forcing into smaller spaces with more people and less amenities for a family.



**From:** Bay Escapes <stay@bayescapes.com.au>  
**Sent:** Friday, 16 August 2019 6:54 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Re: Holiday rental regulations for NSW

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category, sent

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry and particularly in our area of Port Stephens.

Port Stephens is one of the top regional destinations for both domestic and international tourists. As such, the LGA's employment is also heavily reliant on tourism.

**As a result, regulation for our sector should avoid unnecessary burdens on our operations.**

As a responsible operator, we strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, we oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

As holiday rentals like ours become more important to the tourism economy, it's our strong belief the NSW Government should build a regulatory solution that ensures the sector can reach its economic potential.

Thank you reading our submission.

Kind regards,  
Michelle and Andrew



**Bay Escapes**

Dog Friendly holiday cottages and villas

02 4984 2616 | 0411 624 914 | [stay@bayescapes.com.au](mailto:stay@bayescapes.com.au)

[www.bayescapes.com.au](http://www.bayescapes.com.au)

Follow us on:



**From:** Michelle Black <mdblack1@optusnet.com.au>  
**Sent:** Wednesday, 11 September 2019 2:22 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because we enjoy having people stay in our house, it is a large house and until we move into it permanently in retirement, this is an ideal way to share the pleasure of the house and earn taxable income. We prefer to make the house available as a holiday rental on Airbnb than to have private tenants, thus allowing us to constantly upgrade the property and adding amenity.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

#### STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

#### Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired

- Require evacuation or emergency plans and guest education

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Michelle Black  
6 Wigram St  
Wentworth Falls, Nsw 2782

**From:** Michelle Brunton <m.brunton@outlook.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it provides a safer way to sublet my apartment where I'm covered by insurance and visitors are properly vetted. Rather than going through sites like Gumtree which are saturated and make it difficult to know who you are hosting.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

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Thank you for reading my submission.

Regards,  
Michelle Brunton  
Margaret St  
Fairlight, Nsw 2094

**From:** Michelle Gardiner <mishg1976@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Rob submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it allows me a small income to support myself and my family. There are not that many employment opportunities in Coffs Harbour and this is a way that I can support myself and also provide a service to travellers that is affordable.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

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Thank you for reading my submission.

Regards,  
Michelle Gardiner  
68 Wakelands Rd  
Sapphire Beach, Nsw 2450

**From:** Michelle Mowday <michelle.mowday@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

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Thank you for reading my submission.

Regards,  
Michelle Mowday  
57 Riviera Ave  
Terrigal, Nsw 2260

**From:** Michelle Philip <geckosnewtail@yahoo.com.au>  
**Sent:** Wednesday, 11 September 2019 2:22 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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I host on Airbnb because...

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Thank you for reading my submission.

Regards,  
Michelle Philip  
56 West St  
, Nsw 2469

**From:** Michelle Quigley <mquigs71@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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Thank you for reading my submission.

Regards,  
Michelle Quigley  
6 Brandt Cl  
Belmont, Nsw 2280

**From:** Michelle rakos <michellerakos@gmail.com>  
**Sent:** Thursday, 5 September 2019 5:44 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** recorded and not sent to DCS, Purple category

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

As a result, regulation for our sector should avoid unnecessary burdens on our operations.

As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

Also, limiting the number of guests per bedroom makes no sense as sometimes there are large families with young children who all wish to sleep together. Saying they can't would then have to translate across to the use of hotels would it not? Because we have all stayed with our families all together in hotel rooms since we were small children. That would be the alternative for these families, then forcing into smaller spaces with more people and less amenities for a family.

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Thursday, 12 September 2019 4:03 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Submitted on Thu, 12/09/2019 - 16:02

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Michelle

**Last name**

Rudd

**Name withheld**

No

## Info

**Email**

[mooshellrudd@yahoo.com.au](mailto:mooshellrudd@yahoo.com.au)

**Suburb/Town & Postcode**

CAMPERDOWN

**Submission**

The mere suggestion of limiting the availability and affordability of accommodation in a city that has had

its night time economy obliterated by the lock out laws is simply absurd. \$16B night time economy is about to be unshackled only to be restricted by short sighted approach. Greater Sydney should be make more options available not less.  
Pure stupidity again!

**I agree to the above statement**

Yes



**From:** no-reply@planning.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Thursday, 22 August 2019 2:12 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category

Submitted on Thu, 22/08/2019 - 14:12

Submitted by: Anonymous

Submitted values are:

**Submission Type**  
I am making a personal submission

## Name

**First name**  
Michelle

**Last name**  
Rush

**Name withheld**  
No

## Info

**Email**  
[gmrush@bigpond.net.au](mailto:gmrush@bigpond.net.au)

**Suburb/Town & Postcode**  
2114

**Submission**

We purchased a holiday apartment at Tweed Heads in December 2017 and have used it ourselves and also had STR organised by a local agent. We were recently advised/given 7 days notice of a unitholders meeting to ban STR. We could not attend at such short notice (although did give our proxy to the strata manager), due to a family death. The meeting was held and STR were banned subject to the Proclamation of legislation passed in August 2018 by the NSW Parliament. We find this a ridiculous situation. We do not rent it very often and find this a very big brother approach to something that should be administered by the owners and body corporate. We do agree with a code of conduct but now find us in a situation where our purchase is planned to be hindered by not being able to do the occasional STR. The STR helps pay the operating costs and we intend to use it more ourselves as we get closer to retirement. We are currently in our late 50's so this is not too far away. This was a purchase at a time when these rules were nowhere to be seen and we were going through a heavy year of breast cancer by myself and this apartment was a great diversion from the medical space we were in. Hopefully commonsense prevails and we are to continue our occasional short term rental. Our property is an apartment.

**I agree to the above statement**

Yes

**From:** Michelle Tran <bthomeaway@gmail.com>  
**Sent:** Thursday, 5 September 2019 2:07 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Minister, Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry. As a result, regulation for our sector should avoid unnecessary burdens on our operations. As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

**From:** Mike Nguyen <minhhatomcua@yahoo.com>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Mike Nguyen  
27 Shaw Ave  
Kingsford, Nsw 2032

**From:** Mikel Goodman <mikel@pr.com.au>  
**Sent:** Wednesday, 11 September 2019 2:20 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

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Thank you for reading my submission.

Regards,  
Mikel Goodman  
30 Hillcrest St  
Terrigal, Nsw 2260

**From:** Mikko Penttila <mikkopenttila@yahoo.com>  
**Sent:** Wednesday, 11 September 2019 2:20 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education



## STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

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Thank you for reading my submission.

Regards,  
Mikko Penttila  
242 Elizabeth St  
Surry Hills, Nsw 2010

## Submission regarding the proposed NSW short-term rental accommodation reforms

Miranda Burne  
13 Hoop Pine Lane,  
Suffolk Park, NSW, 2481  
02 6685 3114

I think the reforms that are proposed favour the interests of holiday accommodation providers at the expense of local permanent residents and will put further pressure on rental and property prices that are already exceedingly high. Indeed, the area where I live, Byron Bay, ranks number 1 in the country for property prices. This is having the effect of hollowing out the town so that only accommodation providers can afford property here.

Some points of concern about the proposed legislation are as follows:

We need a limit on the percentage of time people can let their places out for holiday accommodation. Although 90 days has been mooted as a possible exception for Byron Bay, even this represents a large amount of time on weekends and over holiday times which will still leave us with the problem of people being kicked out of rentals over the holiday season. We need even shorter limits.

The provision that allows people to get around any overall limit to the amount of days rented by allowing 21 consecutive days to override the overall limit will undermine it completely and should not be implemented.

Councils should be the bodies responsible for regulating the industry rather than the industry its self.

This proposed legislation should not override other planning instruments etc where there are inconsistencies between legislation.

Thank you for your consideration of this submission.

Miranda Burne

**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Monday, 9 September 2019 10:26 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** recorded in DPIE subs register, Purple category

Submitted on Mon, 09/09/2019 - 10:24

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Miranda

**Last name**

Burne

**Name withheld**

No

## Info

**Email**

[mirandaburne@ctemail.net.au](mailto:mirandaburne@ctemail.net.au)

**Suburb/Town & Postcode**

Suffolk Park

**Submission file**

[submission-air-bnb.docx](#)

**Submission**

Submission regarding the proposed NSW short-term rental accommodation reforms

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Thank you for your consideration of this submission.

Miranda Burne

**I agree to the above statement**

Yes

**From:** Miranda Newcombe <mirandadrury@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:22 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Tom Submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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I host on Airbnb because...

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Thank you for reading my submission.

Regards,  
Miranda Newcombe  
30 Bayline Dr  
Point Clare, Nsw 2250

**From:** Miranda Short <mlshort8@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

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Thank you for reading my submission.

Regards,  
Miranda Short  
13 Bulgoon Cres  
Ocean Shores, Nsw 2483



**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Wednesday, 11 September 2019 7:10 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** recorded in DPIE subs register

Submitted on Wed, 11/09/2019 - 07:10

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

miranda

**Last name**

Van Gramberg

**Name withheld**

No

## Info

**Email**

[mirandalvg@hotmail.com](mailto:mirandalvg@hotmail.com)

**Suburb/Town & Postcode**

ocean shores 2483

**Submission**

Short term holiday accomodation in residential areas is invasive and intrusive. In a popular area like the Byron shire, holiday rentals are taking over from long term rentals and local residents are finding it

difficult to find rentals to live in. It is also pushing up rental prices making it unaffordable for local families.

Short term holiday rentals in residential area does not fit with the local values. Those on holidays often stay up later, make noise and do not respect the environment that they are staying in.

I feel holiday accomodation should be restricted in where they can operate websites such as AirBnb should be under tighter restrictions

**I agree to the above statement**

Yes

**From:** Miriam Keen <miriam\_pedroso@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:19 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because I simply can't afford the total rent of \$700pw on my own!

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

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Specifically, I want to comment on the following:

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Thank you for reading my submission.

Regards,  
Miriam Keen  
15 Herbert St  
St Leonards, Nsw 2065

**From:** Mishka Kelly <theviewbyronbay@gmail.com>  
**Sent:** Thursday, 5 September 2019 9:53 AM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

**Categories:** Purple category

Dear Minister, Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry. As a result, regulation for our sector should avoid unnecessary burdens on our operations. As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

Sent from my iPhone

**From:** MMHL Warrentran <mmhlwarrentran@gmail.com>  
**Sent:** Thursday, 5 September 2019 2:07 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Holiday rental regulations for NSW

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Minister, Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry. As a result, regulation for our sector should avoid unnecessary burdens on our operations. As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

**From:** no-reply@planning.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Monday, 19 August 2019 8:24 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category

Submitted on Mon, 19/08/2019 - 20:24

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Mohammad

**Last name**

Alam

**Name withheld**

No

## Info

**Email**

[mohammadtanziralam@yahoo.com](mailto:mohammadtanziralam@yahoo.com)

**Suburb/Town & Postcode**

2216

**Submission**

# Thanks for supporting STRA

# Mandatory code of conduct without harshness is enough to regulate.

# Please don't introduce registration system. It will create extra work and may discourage STRA. Please don't place any unnecessary burdens.

# Please don't give any power to strata to ban STRA because they unfairly dictate other owners

# Please allow STRA whole year without cap.

**I agree to the above statement**

Yes

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This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it immediately.

Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the NSW Office of Environment and Heritage.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL



**From:** Moira Hickman <moira.hickman@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

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#### Environmental Planning and Assessment (STRA) Regulation 2019

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Thank you for reading my submission.

Regards,  
Moirá Hickman  
7 Falcon St  
Hazelbrook, Nsw 2779

**SHORT – TERM RENTAL ACCOMMODATION**

**SUMBISSION TO THE NSW DEPARTMENT OF  
PLANNING, INDUSTRY AND ENVIRONMENT ON  
THE NEW REGULATORY FRAMEWORK**

**MONICA FLYNN**

**10 SEPTEMBER 2019**

**ATTENTION: Director, Housing and infrastructure  
Policy  
NSW Department of Planning, Industry and  
Environment  
GPO Box 39  
Sydney NSW 2000**

# **SHORT – TERM RENTAL ACCOMMODATION**

## **Introduction**

This submission covers the issues concerning non-host short-term rental accommodation (STRA) in the Leura area of the Blue Mountains Local Government Area.

I have been a resident of 30 Balmoral Road Leura since December 1995. I have concerns about the proliferation of STRA in our neighbourhood and impact on local residents and our sense of place.

I am in agreement with the general thrust of the public consultation draft of the State Environmental Planning Policy (Short-term Rental Accommodation) 2019, the draft Code of Conduct for Short-term Rental Accommodation and the Short-term Rental Accommodation Fire Safety Standard.

## **Fire-Prone Areas**

Balmoral Road in Leura is located in a fire-prone area. We are next to the Blue Mountains National Park. Fires occur in this area on a regular basis.

I recommend that the Department give consideration to banning any Development Consent for non-host STRAs in fire-prone areas because:

1. An outbreak of a bush fire is extremely life-threatening to all persons in the vicinity of the fire due to the speed of movement of fire fronts in this area which is adjacent to the Blue Mountains National Park.
2. Tourists staying in STAs do not know the area as well as permanent residents, who have fire survival and evacuation plans and know the gazetted places of safety.
3. Tourists are not easy to contact and evacuate by the volunteers of the State Emergency Service.
4. They do not understand the seriousness of bushfire situations, and are unaware of the places of safety. In an emergency, especially at night if the power supply fails, they are in serious danger.
5. Tourists, especially from other countries, do not understand the danger posed by lighting fires, and can be unaware of the requirement to avoid lighting barbeques within their STRs during the bushfire season.

For example, tourists in the adjacent Wentworth Falls area set a fire on 03/09/2019 in the picnic area which spread to the adjacent bushland reserve, destroying four hectares and threatened houses. It appears that they were not aware that the Blue Mountains City Council (BMCC) had brought forward the bushfire season to 1 September 2019, and that fires and barbeques were not permitted. This issue of lack of knowledge and information is magnified with tourists from other countries, especially those who cannot read English and the signage.

If the Department allows for non-host STRAs in fire-prone areas, then the Department should require Local Councils to impose the requirement for 10,000 litre water-storage tanks in order to achieve a Development Consent.

### **Lack of Compliance by STRA Property Developers**

The Blue Mountains City Council (BMCC) requires property developers to submit Development Applications for STRAs in fire-prone areas.<sup>1</sup>

We have three STAs in our street and another one being developed. In the area bounded by Malvern Road and Gordon Road, there are 26 properties.

None of these property developers have submitted a Development Application to BMCC for these non-hosted STRAs, as required. No Development Consent has been granted by BMCC.

This lack of compliance with the BMCC Local Environment Plan indicates to me that these property developers are either ignorant of the planning instruments or have no interest in complying with them. If the latter is the case, it is doubtful that the property owners/hosts will be interested in complying with the STRA Code of Conduct.

I recommend that the Department give consideration to the development and implementation of a **compulsory on-line education campaign for STRA hosts**. This will ensure that there is a high level of knowledge and understanding of the obligations of STA hosts and the rights of neighbours.

### **Proximity to non-host STRAs**

We are in a group of five houses, three of which are non-host STRAs. After speaking with other permanent residents in the street, the following problems have been identified:

- excessive noise problems, especially when guests have turned the house and garden into a party property, for birthdays, weddings, barbeques, and anniversary parties.
- unruly guest behaviour, such as excessive alcohol consumption, screaming children, and loud music.
- guests who had dogs which bark incessantly when the guests left the property to go sight-seeing and shopping.
- increased rubbish, especially when two different groups have used the property in one week. The recycle and rubbish bins have overflowed and items of rubbish have been blown down the street, to our detriment.
- illegal parking, where vehicles of people (that is, guests of the STRA guests) attending parties and social events have parked in the BMCC

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<sup>1</sup> Blue Mountains City Council, Local Environment Plan 2015, Sec 6.29 (3) (c)(c)

owned access laneway which clearly designed by BMCC as “No Parking Beyond this Point”.

- guests illegally parking across the pedestrian pathway and nature strip outside the non-host STRAs. We have no choice but to walk on the bitumen roadway. This causes difficulties for pedestrians, especially parents with children in strollers, and dog walkers who are forced onto the road, and for motorists and cyclists who have to weave around them.

The proposed Code of Conduct and the complaints processes through the Office of Fair Trading will do some way towards the amelioration of these problems.

Additionally, the local council should be empowered to apply more stringent requirements to minimize noise in particular aggregated settings, for example, the non-hosted STRA adjoins a Dog-off Leash Area, such as Leura Oval.

### **Overtourism and the Ratios of STRAs in Residential Areas**

Balmoral Road Leura is an area of outstanding natural beauty with a heritage streetscape. It has extensive gardens, tall trees over 90 years old, and housing dating to the Federation and pre-war eras.

Since the advent of Airbnb, Balmoral Road has become a magnet for property developers. Many more non-host STRAs can be anticipated as property developers buy houses in the street, when they become available on the property market.

Currently, on any one night, we could have up to 24 strangers staying in Balmoral Road. Over a period of 12 months, there could be hundreds of strangers staying for varying periods.

This situation leads to overdevelopment which can be defined as “the excessive growth of visitors leading to overcrowding in areas where residents suffer the consequences of temporary and seasonal tourism peaks, enforcing permanent changes to their lifestyle, access to amenities and general-well being”.<sup>2</sup>

I urge the Department to give consideration to the introduction of the concept of overtourism. When considering a Development Application for a non-host STRA, local councils should have the legal responsibility to consider the ratio of non-host STRAs to permanently owner occupied dwellings and long-term tenant occupied dwellings. Council should have the right to take the cumulative effects of non-host STRAs, and to be able restrict the number and location of non-host STRAs. This will ensure that each individual street does not become overloaded with non-residents.

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<sup>2</sup> Noosa Shire Council, *Short Term Accommodation – Online Platform Issues Paper*, 12 February 2019, Page 9.

There is a saturation point where tourism can start to irreparably erode a community, a neighbourhood's social capital, strain infrastructure and reduce property values. Some key indicators of overtourism in Leura include:

- Strained local amenities such as car parking where it is near impossible to get a car park space to shop at the local supermarket and shops.
- Road and traffic congestion: The Leura Mall is known as the "Leura Crawl" where traffic jams occur frequently when large numbers of vehicles are trying to access the Great Western Highway.
- Residents may suffer the loss of property values due to the erosion of residential amenity and on-going problems with tourists.
- Residents are displaying lack of tolerance for the tourism sector and visitors. I have noticed increasing levels of disparaging remarks about tourists. This has led to feelings of mistrust, reduced perception of personal safety and increased alienation.

### **A Sense of Community**

With the infiltration of tourists into Balmoral Road, our settled feeling and perception of safety is reduced by strangers, new vehicles and different transitory movements throughout the week, weekend and school holiday periods.

Airbnb is disrupting the sense of community in our Leura neighbourhood, as property owners are disengaging from their homes by transforming them into commercial operations. We have 120 Airbnbs in the Leura Village area, which demonstrates the commercialization aspect. There are also a large number of non-host STRAs available through Stayz and local real estate agents.

As most residents and homeowners would attest, once you have lived in a street or area for a period of time, you experience a settled feeling, higher perception of safety and security from knowing your neighbours, sighting familiar vehicles each day and attuning to the social, work and travel movements of those who live around you. We hold a street party once per year in the home of one of the homeowners, we help each other with our gardens and mulching, we keep an eye out for each other if someone has a fall, we help each other in times of extreme fire danger to evacuate our properties and move to places of safety. In a street occupied by many retired and elderly people, this is essential. Airbnb and Stayz are destroying this settled feeling.

### **Social Cost and Rate Increases for STRA Owners**

There is a degree of resentment and anger among local homeowners who have spent years planning and maintaining their beautiful gardens. These gardens and the streetscape of Balmoral Road as a whole has become a magnet for STRA property developers, as it encompasses the pleasure and joy of a visit to

the Blue Mountains. We have put so much time, money, work and energy into our houses and gardens, only to discover that property developers/hosts are exploiting this environment, and making a great deal of money out of it. We receive no contributions to our public residential amenities from these property developers/hosts. We are the tax-payers and rate-payers of NSW who are incurring the majority of the **social cost** of non-host STRAs.

I recommend that the Department give consideration to a change to the way in which Local Government Councils are permitted to charge rates so that non-host STRAs pay higher rates than permanent residents.

I recommend that these additional rate payments be directed towards the improvement of the public residential amenity, such as **street plantings**. We have lost so much of the urban tree canopy in Leura due the RFS 10/50 rule, we would definitely benefit from more street planting. I would go so far to say that If BMCC purchased and gave us the trees, we would do the planting ourselves with collaboration with the Leura Garden Club and the Leura Bushcare Group.

## **Conclusion**

As property owners increasingly decided to convert their homes to STRAs, the whole community suffers as rents increase, workers discover that it is unaffordable and move away, and the number of volunteers for essential services such as the Rural Fire Service and the State Emergency Service falls away. If everyone feels that the amenity values have declined, there will be a sensation that our community has been gutted. It is up to the NSW State Government to prevent that from happening.

**I urge the Department to give serious consideration to the issues of fire-prone areas, lack of compliance of STA property developers, proximity to STRAs, overtourism, the sense of community, issues of social capital, an education campaign for STA owners/hosts and increases in local council rates for STRA owners.**

Thank you for giving consideration to my submission.

Yours sincerely

Monica Flynn



**From:** noreply@feedback.planningportal.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment  
<noreply@feedback.planningportal.nsw.gov.au>  
**Sent:** Tuesday, 10 September 2019 12:12 PM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Sylvia submissions, recorded in DPIE subs register, Purple category

Submitted on Tue, 10/09/2019 - 12:10

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

## Name

**First name**

Monica

**Last name**

Flynn

**Name withheld**

No

## Info

**Email**

[flynnchery@gmail.com](mailto:flynnchery@gmail.com)

**Suburb/Town & Postcode**

2780

**Submission file**

[short---term-rental-accommodation.docx](#)

**Submission**

Please see attached submission.

**I agree to the above statement**

Yes

**From:** Monica Lee <haruko\_au@yahoo.com>  
**Sent:** Wednesday, 11 September 2019 2:17 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Dom submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

The initial purpose I host on Airbnb is to help with my rent and bills. But for the past year and a half the life of being a sharehome host has been a joyful experience. It has given me the opportunity to meet new people from different countries and backgrounds. Some of them have become great friends.

The Airbnb host community is one place that brings this opportunity. It is also an economic lifeline to help us pay the mortgage and the bills, small businesses to get a boost from tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing
- Mandate smoke alarms – either battery operated or hard-wired

- Require evacuation or emergency plans and guest education

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Monica Lee  
45 Bonar St  
Arncliffe, Nsw 2205

**From:** Morgan holt <morganvrholt@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

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Thank you for reading my submission.

Regards,  
Morgan holt  
26 Regal Park Dr  
Oxley Vale, Nsw 2340

**From:** Moyra Le Compte <moyralc@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

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Thank you for reading my submission.

Regards,  
Moyra Le Compte  
93 Crescent Rd  
Newport, Nsw 2106



**From:** Mr Burrows <stevebur2001@yahoo.com.au>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

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Thank you for reading my submission.

Regards,  
Mr Burrows  
17 Bungendore Rd  
Picketts Valley, Nsw 2251

**From:** John Lin <australia886@gmail.com>  
**Sent:** Friday, 6 September 2019 10:39 AM  
**To:** DPE PS STHL Mailbox  
**Subject:** holiday rental regulations for NSW

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** recorded and not sent to DCS, Purple category

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

**As a result, regulation for our sector should avoid unnecessary burdens on our operations.**

As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

As holiday rentals like mine become more important to the tourism economy, it's my strong belief the NSW Government should build a regulatory solution that ensures the sector can reach its economic potential.

Thank you for reading my submission.

Mrs A. Williams

**From:** Mrs Hembry <hembry@internode.on.net>  
**Sent:** Wednesday, 11 September 2019 2:21 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** Rob submission, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

We host on Airbnb because we have a home that has been designed specifically for those people who are looking for a fully wheel chair accessible holiday accommodation , where they can come and have time away in comfort and enjoy the Central Coast and all it has to offer  
Our home has a lovely view of the ocean which they can enjoy in the comfort of our home. The income also helps us as an economic lifeline as a self funded retired couple

I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

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As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Mrs Hembry  
7A Roslyn Pl  
Noraville, Nsw 2263

**From:** Mrs Hulme <rlbc58@hotmail.com>  
**Sent:** Wednesday, 11 September 2019 2:14 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because...

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

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Thank you for reading my submission.

Regards,  
Mrs Hulme  
104 Prince Charles Parade  
Kurnell, Nsw 2231

**From:** Mrs Isele <coriisele@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:21 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb because it helps pay mortgage and school fees.

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Thank you for reading my submission.

Regards,  
Mrs Isele  
117 Burru Ln  
Kalkite, Nsw 2627

**From:** Jenny Abraham <jabraham@ords.com.au>  
**Sent:** Thursday, 19 September 2019 4:35 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** STRA Discussion Paper

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

In response to the Government's call for new regulations and a code of conduct for AIRBNB and the like, I wish to register the following comments:

1. My overwhelming consideration is that the owners in strata units have the right to determine the rules under which they live. If those rules are to be changed they must be subject to a 75% vote.
2. The above arises from the concern over the disruption that short term rentals would have on the well-being of resident owners and long term rentals.
3. I find it hard to believe that the present proposals for STRA are put forward by people who have any knowledge of the day to day running of a large strata complex with all the facilities therein, namely swimming pool, gymnasium, sauna and common areas.

All I'm pleading for is a fair go to allow the democratic process to prevail.

Thank you,  
Ms Jenifer Abraham  
"Highgate"  
2102/127 Kent Street  
Millers Point NSW 2000  
Mob. 0414 969854

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**From:** Ms Kerslake <belinda\_kerslake@yahoo.com.au>  
**Sent:** Wednesday, 11 September 2019 2:15 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, Sylvia submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

As a local Airbnb host I wanted to provide my feedback on the Government's proposed regulations.

I host on Airbnb with my existing home when we go on holiday to help pay for our trip and our mortgage. I live in a quiet residential area, and because it's our own house, we are very picky about who stays, and it's only up to 4 weeks a year.

The Airbnb host community depends on hosting as an economic lifeline to help us pay the mortgage and the bills. I also recommend my favourite cafes, restaurants and shops so small businesses get a boost from local tourism.

I am deeply concerned that the NSW Government's proposed short-term rental accommodation (STRA) rules will make it harder and more expensive for me to share my home.

I understand that the Government has made commitments to support "fair short term rental accommodation (STRA) regulation that supports the sharing economy".

Generally I support the Government's approach, however parts of the current proposals are unfair and fall short of the Government's commitments.

Specifically, I want to comment on the following:

STRA State Environmental Planning Policy

I oppose the requirement for costly complying development permits. This expensive permit will make hosting out of reach for most people who will be forced to pay hundreds or thousands of dollars for a permit to simply share their home. For hosts who share their home for a few weeks a year, this is a significant barrier to home sharing and will make hosting uneconomical. For holiday homes up and down the coast, and in the regions, these have existed for decades without these expensive permits which will end up making holidays across NSW more expensive.

Environmental Planning and Assessment (STRA) Regulation 2019

I oppose the unprecedented requirements to introduce red tape to make costly alterations to my home before hosting, such as expensive lighting systems. Both South Australia and Tasmania state clearly that hosting is an ancillary use of an approved residential dwelling – for the vast majority of hosts, this means there are no requirements to alter a home to be compliant with regulations. Put simply, if my house is approved to be safe for me and my family to live in, it's safe for my guests. I support the NSW Government streamlining safety regulations which:

- Respect the ancillary use of my home for home sharing

- Mandate smoke alarms – either battery operated or hard-wired
- Require evacuation or emergency plans and guest education

#### STRA Property Register

I oppose the potentially costly, complex, and onerous STRA property register. At every stage of consultation, registration has been considered, debated, and ultimately rejected. In South Australia there are no fees and no registration or licensing system, allowing the home sharing economy to thrive. In Tasmania, there is a simple, quick and cost effective self-assessment form, which is only required in limited circumstances – usually for holiday homes or weekenders only – and a data sharing framework.

#### Code of Conduct

I support the Code of Conduct which overall is reasonable and representative of the home sharing community, and provides strong protections for hosts and guests from vexatious or frivolous complaints. I ask that the Government amend the Code to allow hosts such as myself to be covered by insurance directly provided by a booking platform.

As the NSW Government considers how best to regulate home sharing, the message of hosts across NSW remains the same - we want to work with you and have a say on developing fair, innovative rules that reflect how people travel and use their homes today, not last century. We don't want severe home sharing rules, overly complicated planning requirements, or expensive or complex registration systems.

Thank you for reading my submission.

Regards,  
Ms Kerslake  
99 Parkes Rd  
Collaroy Plateau, Nsw 2097

**From:** no-reply@planning.nsw.gov.au on behalf of Planning Portal - Department of Planning and Environment <no-reply@planning.nsw.gov.au>  
**Sent:** Sunday, 1 September 2019 9:02 AM  
**To:** DPE PS STHL Mailbox; stracode@finance.nsw.gov.au  
**Subject:** Webform submission from: Have your say on short-term-rental accommodation reforms > Content

**Categories:** Purple category

Submitted on Sun, 01/09/2019 - 09:01

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

**First name**

Murray

**Last name**

Allan

**Name withheld**

No

## Info

**Email**

[info@guardfire.com.au](mailto:info@guardfire.com.au)

**Suburb/Town & Postcode**

Medlow Bath 2780

**Submission**

I suggest that there is provision in the 'Short-term Rental Accommodation Fire Safety Standard' that the installed equipment is tested and certified by a Competent Fire Safety Practitioner.

As it is with other small short term rental establishments, e.g. Motels, Bed and Breakfasts, Boarding Houses etc.

**I agree to the above statement**

Yes

**From:** Murray Oakley <bongos2428@gmail.com>  
**Sent:** Wednesday, 21 August 2019 5:26 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Re: Holiday rental regulations for NSW

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Purple category, sent

Dear Minister,

Short-term rental accommodation is an important driver of economic growth and job creation for the NSW tourism industry.

**As a result, regulation for our sector should avoid unnecessary burdens on our operations.**

As a responsible operator, I strongly support the creation of a register of all holiday rental properties listed on a platform and the code of conduct. However, I oppose the night limits and use restrictions for our properties – restrictions of this kind will put an important holiday tradition at risk and deprive many holiday homeowners of income they have come to rely on.

As holiday rentals like mine become more important to the tourism economy, it's my strong belief the NSW Government should build a regulatory solution that ensures the sector can reach its economic potential.

Thank you reading my submission.

Regards

Murray Oakley

**From:** MUYE MA <bitcooper@gmail.com>  
**Sent:** Wednesday, 11 September 2019 2:18 PM  
**To:** DPE PS STHL Mailbox  
**Subject:** Submission to Short Term Rental Accommodation Discussion Paper

**Categories:** emailed to DCS, David submissions, Air BNB run

Dear Director, Housing and Infrastructure Policy,

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Thank you for reading my submission.

Regards,  
MUYE MA  
245 Pacific Hwy  
North Sydney, Nsw 2060