



ENQUIRIES TO: Amanda Fox (9273 6069)
Strategic Planning Officer

OUR REF: SC3243 – D19/3103 – D19/3106

25 January 2019

Mr David Worth
Principal Research Officer
Economics and Industry Standing Committee – Legislative Assembly

By Email: laeisc@parliament.wa.gov.au

Dear Mr Worth

Parliamentary Inquiry into Short Stay Accommodation

Thank you for the opportunity to provide comment on the Parliamentary inquiry into the regulation of short stay accommodation in Western Australia. This matter is of interest to both the Council and the broader community and the City supports an industry wide inquiry.

The City is proactive in regulating short stay accommodation by way of its Local Planning Scheme No. 2 and Local Planning Policy provisions, in addition to compliance management procedures which are supported by the planning framework. The framework seeks to support short stay accommodation in a variety of forms while minimising potential negative impacts on the local community.

The City encourages further investigation by the State Government to establish and guide a regulatory framework which balances the social and economic benefits with the need for an appropriate level of widespread management of the short stay accommodation sector. The framework should support local governments to respond to changing trends and nuances within their jurisdiction that address the diversity in the short stay accommodation market. An appropriate level of regulation will provide certainty and consistency for all short stay accommodation stakeholders and the larger community.

A copy of the City's detailed response is attached, which addresses the key issues identified in the inquiry Terms of Reference.

The City is keen to continue to provide feedback and work with the State Government on addressing issues arising from short stay accommodation with the goal of providing a transparent and appropriate level of regulation within the industry.

If you have any questions regarding this submission please contact Amanda Fox on _____ or _____

Yours sincerely

Jordan Koroveshi
COORDINATOR POLICY & PLACE

Response to Parliamentary Inquiry into Short Stay Accommodation

1. The forms and regulatory status of short-stay accommodation providers in regional and metropolitan Western Australia, including existing powers available to local government authorities.

Short stay accommodation in the City of Vincent includes Bed and Breakfasts, Serviced Apartments, Lodging Houses and Holiday Houses, which may be run in a house, unit or apartment. These different forms are generally differentiated by the number of guests permitted and whether the accommodation is hosted or un-hosted. Each accommodation form presents a different level of impact which the City proactively regulates through provisions within Local Planning Scheme No. 2 (the Scheme) and Local Planning Policy 7.4.5 Temporary Accommodation. This policy addresses issues such as what requires development approval, car parking, length of stay, amenity impact, and health and building requirements.

The current State Government planning framework provides discretion to local governments to regulate short stay accommodation. It is important that any standardisation of regulations and policy does not limit the ability of local governments to be responsive to local community needs and that Council maintain the ability to make decisions in a local context.

2. The changing market and social dynamics in the short-stay accommodation sector.

The City has seen a rise in applications for short stay accommodation uses since 2014.

The table below shows the development applications for short stay accommodation uses processed by the City over a five year period:

Short Stay Accommodation applications	2018	2017	2016	2015	2014
Holiday House (less than 6 guests)	10	8	9	4	1
Bed and Breakfast	1	-	1	-	-
Serviced Apartment	1	1	3	2	-
Lodging House (more than 6 guests)	2	1	-	2	2
Total	14	10	13	8	3

3. Issues in the short-stay accommodation sector, particularly associated with emerging business models utilising online booking platforms.

Despite provisions in the City's planning framework for regulating short stay accommodation, it is relatively easy for people to commence a short stay accommodation use without obtaining the required approvals. This issue has previously presented a challenge for the City and has been growing recently, potentially due to the ease with which online platforms allow operators to provide accommodation despite not obtaining the relevant approvals.

These unauthorised short term accommodation uses may often have a detrimental impact on the amenity of the adjoining properties, resulting in enquiries and complaints

being received relating to issues such as car parking, excessive noise and anti-social behaviour. As a result, the City deals with an increasing number of compliance matters and investigations relating to unauthorised short term accommodation uses.

Conclusion:

The City encourages further investigation by the State Government to establish and guide a regulatory framework which balances the social and economic benefits with the need for an appropriate level of widespread management of the short stay accommodation sector. The framework should support local governments to respond to changing trends and nuances within their jurisdiction that address the diversity in the short stay accommodation market. An appropriate level of regulation will provide certainty and consistency for all short stay accommodation stakeholders and the larger community.