

Our Ref: LUP/257 - D18/225839

Your Ref:

Enquiries to: Mr M Ross



23rd January 2019

Principal Research Officer
Legislative Assembly Committee Officer
Level 1, 11 Harvest Terrace
WEST PERTH WA 6005

Email: laeisc@parliament.wa.gov.au

Dear Sir/Madam

Re: Inquiry into Short-Stay Accommodation

The City welcomes the opportunity to provide a submission to the Economics and Industry Standing Committee (Committee) into the inquiry of Short-Stay Accommodation in Western Australia. The City acknowledges the Committee has resolved to investigate and report on the adequacy of the regulation of short-stay holiday letting in Western Australia, covering issues including customer safety, insurance, land use planning, building standards, stay length, neighbourhood amenity, registration, licensing and taxation.

The City is aware of concerns raised by existing operators of short-stay accommodation through a Registered Short Stay Accommodation Providers Forum held on the 25th October 2018, hosted by Tourism Rockingham. One of the key concerns of local registered short-stay accommodation providers is a lack of a 'level playing field', and it has been suggested that there are over 200 Airbnb accommodation providers within the City that do not have the necessary planning or building approvals. The response from registered short-stay accommodation providers also suggested that they are reporting a loss of bookings to unregistered short-stay accommodation providers. The City agrees that unregistered short-stay accommodation providers are disruptive new players in the sector and are impacting on registered operators.

The City supports the "Draft Options Paper, Options for regulating sharing economy short-term accommodation in WA", August 2018 by the Department of Planning, Lands and Heritage (DPLH). The Draft Options Paper outlines well the key policy challenges and approaches taken by other states and local government and considers options for how the State Government may seek to respond. The Draft Options Paper reflects the issues experienced in our local government area. The City also agrees with the DPLH in that local governments often lack the resources to enforce and proactively regulate. The City generally follows a complaint-response process for enforcement.

The City agrees that there should be a 'level playing field' for equality and consistency. A holistic approach is needed in State wide regulations/legislation for all operators, rather than an ad-hoc local government by local government approach.

The City awaits direction from the Committee on its recommended approach on the adequacy of the regulation of short-stay holiday letting in Western Australia, where resolution of the short-stay holiday letting is needed as a priority.

Yours faithfully

MICHAEL PARKER
CHIEF EXECUTIVE OFFICER

