

ECONOMICS AND INDUSTRY STANDING COMMITTEE

INQUIRY INTO SHORT-STAY ACCOMMODATION IN WA



**TRANSCRIPT OF EVIDENCE
TAKEN AT PERTH
WEDNESDAY, 31 OCTOBER 2018**

Members

**Ms J.J. Shaw (Chair)
Mr S.K. L'Estrange (Deputy Chairman)
Mr Y. Mubarakai
Mr S.J. Price
Mr D.T. Redman**

Hearing commenced at 10.40 am

Ms GAIL McGOWAN

Director General, Department of Planning, Lands and Heritage, examined:

Ms JACQUELINE STONE

Director, Policy and Projects, Department of Planning, Lands and Heritage, examined:

Ms KYLIE WOODS

Senior Legal Officer, Department of Planning, Lands and Heritage examined:

The CHAIR: On behalf of the committee, I would like to thank you for agreeing to appear today to provide evidence in relation to the issue of short-stay accommodation in Western Australia. My name is Jessica Shaw and I am Chair of the Economics and Industry Standing Committee. I would like to introduce the other members of the committee: to my right is Yaz Mubarakai, member for Jandakot; to my left is the Deputy Chair, Sean L'Estrange, member for Churchlands; Stephen Price, member for Forrestfield; and Terry Redman, member for Warren—Blackwood. It is important that you understand that any deliberate misleading of this committee may be regarded as a contempt of Parliament. Your evidence is protected by parliamentary privilege. However, this privilege does not apply to anything you might say outside of today's proceedings. Before we begin with our questions, do you have any questions about your attendance here today?

Ms McGowan: No, we do not.

The CHAIR: The Committee has been provided with some correspondence from your office. Would you like to clarify for us the status of that document and the degree to which you are prepared to talk to it today?

Ms McGowan: Absolutely; thank you for the opportunity, and for the chance to talk with the Committee. I also apologise in advance for David Caddy, the Chairman of the Western Australian Planning Commission, who is not able to be here today because he is out unveiling a restored Krupp gun at Whiteman Park. On behalf of both the Department and the Commission, I welcome the inquiry.

The CHAIR: Can I just clarify that we have not initiated an inquiry.

Ms McGowan: Okay.

The CHAIR: We also have not adopted terms of reference. We have received some correspondence from your office. I just want to clarify the status of that and then we will invite you to make opening submissions if that is okay. Just so we are very clear on what we are talking about today.

Ms McGowan: Perfect, thank you. The options paper that you have been provided with is a paper that we have been preparing over the past few months in response to some of the issues. It has not yet been formally considered by the Western Australian Planning Commission, although the chairman is aware of it; neither has it been fully considered by the minister but she has asked us to make it available to you, which we have done quite willingly because we think it might assist in some of your deliberations. Equally, while recognising that it remains a draft document and might need some fine-tuning —

The CHAIR: So it does not represent the State Government's policy?

Ms McGowan: It does not represent the State Government's policy and does not represent the Commission's policy; it is simply an options paper in draft form for consideration, but we are equally happy for you to use it as you see fit. If that needs to be made more public, that is fine.

The CHAIR: Thank you very much for that. I do appreciate that, Ms McGowan. I invite you then to make an opening statement.

Ms McGowan: We do welcome the opportunity to chat to you. Obviously there is a fair level of community interest and as a consequence of that we, and also in collaboration with Tourism WA, have been looking at the continuum of options from very light-handed to a more regulatory approach. The short-term accommodation market has changed significantly over the past few years, particularly since the emergence of online e-commerce platforms. We are seeing significant differences between traditional accommodation providers—what we would call hosted short-term accommodation and unhosted. We can go into more detail about that later. Obviously the informal and organic development of this section of the tourist accommodation market has led to a number of operators establishing businesses with minimal regulation and that has resulted in real or perceived issues of inequality with alternative service providers.

Whilst the Planning Commission has existing policies to guide tourism planning and decision-making by both the WAPC and local government, we have also been working on a draft position statement on tourism planning that responds in part to the issue. Again, that is not a finalised document. We also have existing tourism planning guidelines that were released in 2014. They are another tool to provide more information for the tourism industry accommodation providers and guests. In the draft position statement—as distinct from the options paper you have before you—we talk about introducing a new definition of hosted tourism accommodation, as opposed to unhosted, and guidance. It certainly stops at that point. The current guidance allows local planning schemes to provide for planning controls and for all forms of tourism development. Those controls may include a requirement for development approval or other scheme provisions deemed appropriate by local government, but it is very much left to the local government.

It is also really important to acknowledge that many of the regulatory issues that are a cause of some concern and being posed by short-term letting, while many can be addressed through the planning system, a significant number cannot and they canvass things like insurance, building standards, taxation treatment and the like, which certainly are beyond the province of the planning framework. We have seen some local governments, such as the Shire of Augusta–Margaret River and the City of Busselton and City of Fremantle being quite proactive in how they are regulating short-term accommodation within their local planning schemes and also through the implementation of local planning policies and local laws. As I said, the committee has been provided with the internal options paper. We are happy to answer any questions you might have or to discuss this in more detail.

The CHAIR: Great; thank you very much. To give you a sense of why we have invited you to appear before us today, the Committee is considering initiating an inquiry. We have not settled on terms of reference, but the discussion today will assist us in deciding whether we proceed and in the crafting of those terms of reference. We want this to be a pretty open discussion to air the issues and guide our considerations of whether to initiate an inquiry and adopt terms. It is with that that I hand over to my colleagues.

Mr D.T. REDMAN: Thank you for coming in and making a presentation. I am interested in your early assessment of the respective jurisdictions on the issue of what is happening with hosted and unhosted accommodation in what might be seen as a disruptive influence. You have talked about planning having a role and there is local government, tourism—a whole range. I am interested in

your assessment of the respective jurisdictions towards the issue; and, secondly, how well they are armed in a regulatory sense to respond from their particular perspective.

Ms McGowan: It is certainly a really vexed issue. It depends to a degree—if you talk about local government, for instance, that will depend in a large part on the sophistication and capacity of a local government. Enforcement, no matter what we do, will always be an issue, and has been an issue in many cases. Equally, if we talk about the extent to which a mum and dad might choose to register accommodation as opposed to someone who might more knowingly seek to circumvent a system of regulation around whether it is the building requirements and requirements for certain standards, that is probably quite a different thing and I cannot give a direct response on how well that is managed or not managed, although I have been known to say that obviously one of the issues would be that you would make the taxation office aware of any provisions if it was causing some concern.

The interstate jurisdictions—for instance, in New South Wales I think they almost have the reverse problem. As we noted in the options paper, some of their issues are much more a shortage of the longer-term accommodation outside the regions. I visited the Busselton–Margaret River area a couple of weeks ago. In speaking to the local government there, both the elected members and the staff, there is quite a distinction between, for instance, what happens in Margaret River and the concerns they have in the town of Margaret River as opposed to what happens in Prevelly and the acceptance of accommodation. They are probably some of the complexities we are dealing with. I am not sure whether that gives you —

Mr D.T. REDMAN: I guess I was thinking also of respective government agencies. Who do you think, in terms of government agencies, would buy into this? I am thinking about in terms of contribution to the discussion.

Ms McGowan: I certainly think that there is a strong tourism aspect to it because the balance is between encouraging opportunities to make sure we have a wide range of options available, both for consumers and opportunities for people to earn some additional income. How we achieve that balance is a significant issue across the tourism sector. The other significant player at the state level is clearly the Building Commission, or Department of Mines, Industry Regulation and Safety from that sense, because that is where that interface in terms of the building standards kicks in. Arguably, you would then look at local government in terms of the *Local Government Act* and the local governments themselves—whether you look to WALGA and the differences there—and the extent to which obviously at federal jurisdictions you look at the taxation office as well. They are probably the primary ones. Jacquie, have I covered it?

Ms Stone: Maybe also Landgate in regard to strata.

Ms McGowan: Yes, strata titles and Landgate. They are probably the ones that we have had the most interface with.

Mr D.T. REDMAN: You said that this has been on your agenda for five or six months?

Ms McGowan: Probably a bit longer. There have certainly been issues raised and pressure points, I would say, for at least the last couple of years.

Mr D.T. REDMAN: What have been the signals coming in to put this on the agenda?

Ms McGowan: There have been very mixed signals. We have certainly had interactions with some of the online platform providers. We have had interactions with existing tourism operators who feel that they may be being disadvantaged, but it has been an issue that has probably ranged from when it first started being raised as an issue, more around the amenity, the party house-type situation, to now going across the continuum to whether there are disadvantages or inequality in regulation

going ahead. There have been arguments that short-stay accommodation, or the ability to do short-stay accommodation, has existed in many forms for many years.

I know from personal experience when I was in Europe over a decade ago and we were renting a mix of hotels and short stay. As an example of just how challenging it is now getting, my husband and I stayed in a place in the South West the other week and when I went back and had a look for it I could access that particular accommodation, which was registered, I might add, on a total of 14 different forms of website, from formal tourism to some of the online trading platforms. Some arguments have been that the market will settle itself, in the same way as when serviced accommodation first became a component of the market. Others say that it is now becoming a little more complex and there is a need for greater intervention. The question is: what is that balance?

Mr D.T. REDMAN: A range of issues present to the Department of Planning and the WAPC in terms of using planning instruments to be able to manage that. There is a whole complexity that you use those tools as a state government to be able to manage and get good landing points. Local government has a level of jurisdiction in this space. If we pursue this, one of the issues is just how much and what are their tools and the capacity to get compliance. It is referenced a little here in examples but not necessarily a viewpoint—it may be too early for that—about the importance of getting some level of statewide framework and/or guidance which gives a bit of continuity across the state, recognising that there are some local differences that apply here that a bit more nuancing at a local level makes a bit of sense. Do you have a view about that?

Ms McGowan: I would probably prefer not to express a particular view because you are right in that the sense is the extent to whether it is best dealt with at the local level or a high level. I will get Jacque to talk about what the existing regime does in terms of how we have many definitions for holiday accommodation and tourist accommodation now. If we explain how the framework works now, that might lead to —

Ms Stone: Currently, as you may be aware, we have the *Planning and Development (Local Planning Schemes) Regulations* that set out a number of model provisions, including definitions. There are a number of definitions in there that cover various tourist accommodation, including one for holiday houses, which could be applied in those circumstances, which is what Busselton and Augusta–Margaret River have in their schemes—not that exact definition but a similar definition. There is certainly provision for local governments to introduce a scheme amendment to include that definition and also to deal with the permissibility in each of the individual zones as to whether they want to make it permitted, discretionary or prohibited. The provisions already exist that they can pick up those tools and put them into each scheme. Some local governments do have them in there and others are silent on it.

When there is no use listed, it could be considered because there are provisions for a use not listed, and there are specific provisions in each scheme about how local government would consider a use that is not outlined in their zoning table. An application could still be received, even if it is not listed in the zoning table, and they would have to follow a certain process to be able to do that.

The CHAIR: Is there scope then for multiple inconsistencies between different local government authorities?

Ms McGowan: I will hand to Kylie. By virtue of local planning schemes and local decision-making, you will get inconsistencies. The opposite end of that continuum is to deem a consistent application, but whether a deemed provision would in fact create more of a problem because, again, it may not have that nuancing that you might want at the local level. Kylie, do you want to add anything?

Ms Woods: Yes. Schedule 2 of the *Planning and Development (Local Planning Schemes) Regulations* includes the deemed provisions and the effect of those is that they automatically have effect across every single local planning scheme in Western Australia as soon as they are put in to the deemed provisions. I think the department still needs to investigate a little more what the implications may be of deeming definitions. When the regulations were first brought out, the definitions were included in the model provisions, which means that local governments could adopt them, but I think further investigation needs to be done on the implementation of deemed provisions, especially because local governments at the moment have different names for zones, for example. If we look at permissibility across a residential zone, there could be different names for the residential zone. It might not have the same effect across all local governments. That is what still needs to be looked into.

Mr S.K. L'ESTRANGE: Just linked to where this conversation is going, I am interested in the definitions. I refer to page 3 of your draft paper on this and the New South Wales approach. It introduces in there this concept of exempt development. I think the last paragraph on page 3 makes perfect sense—obviously regulating the length of stay and setting the limit on the total days per year. Whatever that time is there will be a point at which it becomes a commercial venture and there is a point below that at which it is clearly not.

Do you have any thoughts on the maximum number of days, for example, that a residential house could be offered up for Airbnb that would be deemed non-commercial? For example, a mum and dad and their family for summer over here want to choose between one and six weeks to go skiing and put their place on the market for Airbnb for a family from Europe to come and enjoy the summer while they go off. It is almost like a house swap. It does not necessarily mean a swap, but you understand the concept?

Ms McGowan: Yes. New South Wales is predicated I think on weekends, school holidays and public holidays *et cetera* to make the 180 days that they have. In our current definition of short-term accommodation, we say it means temporary accommodation provided either continuously or from time to time, with no guest accommodated for periods totalling more than three months in any 12-month period. That three months—which is effectively 90 days or thereabouts—is embedded in our system as far as our definitions of tourist and short-stay accommodation at present. I suppose then the question is: is that too narrow a time frame?

Mr S.K. L'ESTRANGE: Just looking at the paper on page 12—appendix 1, definitions—the explanation you gave then seems to cover off on things like cabins, chalets, holiday accommodation and holiday houses. It achieves all of that, but I suppose I am focussing on page 13 where there is a definition under the R codes of what a dwelling is. It is really about the provision of a dwelling for that example I gave over, say, a summer holiday period. It is not short-stay accommodation for a commercial purpose; it is a dwelling —

Ms McGowan: It is a home exchange.

Mr S.K. L'ESTRANGE: Or maybe not even an exchange. It is an exchange through an online platform. You might be exchanging not directly with the people who end up in your home, but with somebody else's home over there. I am just making the point that you have definitions for short-stay accommodation, but I have not been able to join the dots between what I am talking about, which is those families, maybe in metropolitan Perth, who offer up their home over the summer. They are not actually short-stay accommodation providers; they are a dwelling where, for all intents and purpose, 365 days of the year, they occupy that residency with their family, but on one occasion in maybe five years, they choose to put it up on Airbnb. Is that captured here at all?

Ms McGowan: Not at the present time. Again, this is the challenge in the sense that each time you try to introduce a definition, you add a level of complexity, as you will see by the number of definitions we have there now. That is not to say that we cannot. Certainly that has been something that has been a very live conversation as to how you would define, and also why we have made a distinction in the options paper between hosted and unhosted. You are talking about another scenario as well.

Mr S.K. L'ESTRANGE: I put that out there because, picking up on your point earlier with regard to different jurisdictions having different issues, I think where there might be in a particular town or area a predominance of holiday homes, so people's second place that they may go to in their holidays, renting that out commercially as opposed to their primary residence where they might occasionally put it up on Airbnb. I am not asking for it to be included; I am just trying to clarify whether it is here and whether I have missed it.

Ms Stone: The "hosted" definition is only when the person whose house it is is also on the premises at the same time as the guest. It does not provide for them providing the house. It would technically fall into the unhosted category, even if it was for a short period of time under this current —

Mr S.K. L'ESTRANGE: According to this it would be an unhosted dwelling, but it would not be unhosted short-term accommodation.

Ms McGowan: No.

Ms Woods: I think the question is raised: when does something stop being a dwelling and when does it become a different use?

Mr S.K. L'ESTRANGE: Yes, which is exactly what I started with, with the New South Wales example.

Ms Woods: Is it an incidental? It is almost like housesitting, but for a fee. I do not really have an answer.

Mr S.K. L'ESTRANGE: No, I am not expecting one today. This is a scoping exercise and I appreciate —

Ms Woods: That is definitely something to be considered: when does something stop being a dwelling and what is incidental to the use of your home?

Ms McGowan: If I may, that also is part of that issue, in terms of the geography of Western Australia and particularly the south west section, where people have traditionally had a lot of holiday homes—individuals have had holiday homes—now there is an opportunity that has presented itself that is changing some of the way of thinking about those homes, which has a whole lot of knock-on effects. But there are equally other remote areas where there is no competing accommodation alternative.

Mr D.T. REDMAN: You presented us with an options paper with a whole range of regulatory responses, from a light touch to a much heavier touch and, quite rightly, it is a deliberation you are working through and clearly the committee is considering its choices. You also reference at the start of that, including in your opening remarks, about real and perceived views on this. In order to move to statutory planning outcomes, which is one of the landing points in terms of policy statements being made from the WAPC, you need to sort out the real and the perceived. How much filtering have you been doing on that and how many perceived issues are out there as distinct from real issues from a planning perspective?

Ms McGowan: It is very difficult for me to quantify because most complaints would go to a local authority, and most you tend to pick up through the local paper with people complaining about whether it be increased wear and tear, loss of amenity, parking issues, nuisance or noise issues as well. Jacquie, are you aware of anything specific?

Ms Stone: Not in terms of any specific research. I would suggest though that from my interactions with local government, those where there have been issues, whether they are perceived or real, have started to deal with this through their framework. Busselton has had this as an ongoing issue. Prior to the online platforms, even just the issue of vacant houses that are second dwellings as holiday homes, and they have addressed that by putting provisions into their scheme. I would suggest as it is more of an issue in each local government, they would deal with it as they saw fit by introducing provisions to the scheme. I understand Busselton have had theirs in their scheme for a number of years.

Mr D.T. REDMAN: I guess that one of the deliberations if we pursue this is just how much you seek to have the state having a level of intervention as distinct from local government response in respect of compliance. One of the issues is compliance. We can all nicely lay out planning frameworks and put planning things in place, but unless you have a mechanism to ensure that there is a level of compliance, you have a problem. Certainly some feedback I have had has reflected on just how nimble the online platforms are in terms of doing what they do without necessarily getting visibility. I even heard people going on to platforms on weekends and coming off during the week so nothing can be seen during the week. Now that is a level of nimbleness that we are just not going to see anywhere else. I guess that the management of that level of compliance in that environment is very difficult.

The issues I have had raised with me electorate-wise—a big chunk of the South West is in my patch—is not on the platform. Everyone uses the online platform, but it is the issue of equity; that everyone is having to have the same level of compliance and responsibility that government and/or local government ensures. What is your view about a state-level capacity to be able to support this compliance issue? You have one example in your paper. At the bottom of page 10 you refer to not even being allowed on a host platform without being accredited. That would strike me as a very simple process up front, before you even get to a local government level where they have to send out half a dozen compliance officers who may or may not be able to find noncompliance, and if they do, trying to prove that there is noncompliance, which is another step again.

Do you have a view about state tools, planning tools, to assist with compliance, as distinct from the planning issues that are raised out of this?

Ms McGowan: Other than to say that at the current point in time we do not run an accreditation system through the planning system, so it would require some form of resourcing. The closest we have come is some of the bushfire training issues, which takes the agency into quite new territory. Certainly it is a possibility. As you say, it is probably one of the more readily available options.

The question then, when you talk about the nimbleness and the responsiveness, is what is it that you are trying to solve? Like you, we have had various issues around inequality. I see in the local papers that I look at, much more around the nuisance and the party house rather than the inequality. Where is the fundamental problem that we need to regulate, or that we might wish to regulate or wish to introduce a higher level of prescription? How then will that sit alongside the existing mechanisms we have in the planning system, and in other systems, for looking at both promoting tourism, protecting rights of individuals, allowing mums and dads to make a bit of money, and stopping that deliberate circumvention of a regulatory framework that exists, which is the level playing field issue?

Mr D.T. REDMAN: Does the Department of Planning, Lands and Heritage look through a filter for efficiency? Just about without exception no-one wants to add any extra regulatory burden unless it is absolutely needed. You have to have a good argument to go into that space and/or there might be scope to even take away some regulatory burden if that can possibly be achieved. Does Planning

look at the capacity to secure compliance as one of the filters that is put through its process before making planning statements?

Ms McGowan: Anything we do, we have regard for whether someone is going to be able to effectively enforce compliance and what that is going to mean, so, yes, in that sense. However, we are currently also going through a significant planning reform process where there is a unified view across the respondents to the planning reform proposals that the system itself is too complicated and too clunky now so we are trying to strip that back. I am saying that because I think that could provide an opportunity in this space and if we are going to do something, this is probably a good point in time to be thinking about it. Through any of the regulatory review processes we have, or policy reviews, we always have an eye on whether it is going to fix the problem we are seeking to solve.

Mr D.T. REDMAN: By extension to that, some other jurisdictions have done a bit of work, including parliamentary committees. Have you had a scan of that? I know that some of that is in various stages of implementation. Are there any good examples from a planning perspective that you think we should be having a look at?

Ms McGowan: I have not seen the perfect solution yet. Jacquie may wish to comment more because her team has been doing most of the scanning. We are fairly continuously looking at what other jurisdictions are doing and what other approaches are being taken. Certainly that includes Australian jurisdictions and overseas jurisdictions. One of your challenges is that each context is different. We do look at it. I do not think I have seen the perfect solution to this one yet and, Jacquie, I do not know if you have in that sense.

Ms Stone: No. The team has certainly looked at lots of other examples in the context that each jurisdiction is trying to achieve something slightly different out of the policy. As with the Sydney example and some of the overseas examples, it is around the number of permanent rental properties versus short-stays. I guess it comes down to defining the issue you are trying to solve first and also the issue that each of those planning systems is different. The implementation mechanisms that they have available will be slightly different to what is in WA. We certainly look to learn from their examples and take on board any good things that come out of those systems, but none of them will be able to be a perfect fit or replacement.

The CHAIR: What features are endemic to WA that you would suggest we be mindful of?

Ms Stone: In regard to the planning system? Obviously the planning system in WA is set up with the Planning Commission and we are the only Australian jurisdiction that has a Planning Commission that is involved in a planning system; all the other states are much more local government-based. But also in New South Wales and Queensland they have a lot more provisions where they can give statewide direction, which are not necessarily available in WA. They are probably the two key differences in the Australian context.

Mr D.T. REDMAN: From a planning perspective, it is pretty important to define where the issues are. This goes to Sean's point about what the lines are between what is residential and once you start moving into commercial. Secondly, you have made a statement in your submission that the WAPC does not consider it necessary to regulate hosted accommodation given that the operator resides in the dwelling or on site and its tourism value is incidental to the primary residence, so statements have already been made; is that right?

Ms McGowan: That is one of the options. Again, it is the issue of where you actually have someone on site and it is much more of what you might call equivalent to the B&B system that we have seen in the past, we would not see any value-add or any need for a level of intervention necessarily in

that space. I will reaffirm that these are the options we are putting, rather than the positions of anyone. It is just trying to untangle some of those threads that go across, repeating that there are the issues of regulatory equality or inequality in terms of both the way the system is administered in a planning sense but also the building standards. There is what I would call the environmental factors of whether the bins are put out and the parking and the noise through to who is best placed to enforce. Nothing is set in concrete in that, but at the moment our current approach to bed and breakfast is defined. It fits within that tourism accommodation.

Mr D.T. REDMAN: Just to clarify for the sake of Hansard, my quote was in reference to a draft position statement. It was not something that had status beyond that.

Ms McGowan: Yes, the draft position statement was probably what has triggered some of these conversations about whether you are considering to have an inquiry, because the position statement was going that step of defining hosted and unhosted. I think that led to the bigger question of: is that sufficient? It is a draft statement.

The CHAIR: Is anyone tracking the number of these forms of accommodation or whether it is more prevalent in the South West or the North West? Are there any hotspots that we should be focussing on—any particular local government areas?

Ms McGowan: Jacquie and Kylie may add things. Probably it is more an issue in the South West. We do not do specific tracking of how many. When we were talking before we came into the room, there was mention that we have had about 300 letters on the topic in relatively recent times expressing a range of views. We could certainly have a bit of a look to see if it would be useful to the committee to do a quick overview on, one, where they are coming from and what the key issues are. Probably one of the suggestions is if an inquiry is established, whether those people may wish to make contact with the committee. I am happy to do that.

The CHAIR: That would be very helpful because obviously if we do decide to initiate an inquiry, we will be contacting organisations, but a preliminary view of where this is a particularly hot topic would be very helpful.

Mr S.K. L'ESTRANGE: In addition to that, on page 4 at the top you refer to the issue in WA being the reverse to New South Wales. You say there is a lack of long-term residential rentals in regional areas of the State, particularly the South West. You go on to say “purchased specifically for short-stay accommodation”. As part of that submission could you provide us with some data to support that?

Ms McGowan: We may or may not have that data. I do not think we will have it in that level of detail.

Ms Stone: That is probably more an anecdotal statement based on the information we have been receiving in discussions with various local governments. We can have a look at what data we have, but I think it would be difficult to establish without a significant amount of research. Local governments may be in a better position to know, but establishing which houses are holiday homes and which are permanent residences might be difficult.

With the 300 pieces of correspondence that we have received, I would say, again anecdotally, that a lot were related to accommodation in the South West, just from having looked at them and being involved in helping with the responses. Some are metro-based, but predominantly I would say that they are south west. We have not received specific correspondence, but I would have thought that north of Perth and along the coast, in the Gingin–Lancelin area, there would potentially be some as well.

Ms McGowan: It often comes down to what other accommodation choices are in those areas and the proximity as well. Again, taking a one-size-fits-all approach will be quite difficult.

The CHAIR: I will proceed to close today's hearing and thank you for your evidence before the committee today. A transcript of this hearing will be emailed to you for correction of minor errors. Any such corrections must be made and the transcript returned within seven days of the date of the letter attached to the transcript. If the transcript is not returned within this period, it will be deemed to be correct. New material cannot be added via these corrections and the sense of your evidence cannot be altered. Should you wish to provide additional information or elaborate on particular points, please include a supplementary submission for the committee's consideration when you return your corrected transcript of evidence. Thank you very much. That was really helpful for us.

Hearing concluded at 11.20 am
