

SUBMISSION SUMMARY

1. **Hosted and non-hosted short stay accommodation land use must be treated differently.**
2. **Differences between Bed and Breakfast, Services Apartments and Short Stay accommodation land uses should be identified/examined in terms of policy.**
3. **Non-hosted short stay accommodation must be regulated and monitored for compliance.**
4. **Hosted and non-hosted short stay accommodation must not predominate in residential areas and should be prohibited in some residential areas.**
5. **There must be a limit on the number (%) of short stay operations in one street and in areas too saturated with tourist accommodation.**
6. **Risks associated with non-hosted short stay accommodation vary according to locality (eg. urban and rural) and this must be taken into account if deeming provisions are considered.**
7. **Individual LPS/TPS need specific provisions to account for variations in locality.**
8. **Implement codes of conduct and local laws where schemes allow.**
9. **Consider increased rates for property owners operating approved short stay accommodation due to increased pressure on local government services (eg rubbish collection).**
10. **Consider how non-hosted short stay operations can cause nuisance and loss of amenity due to increased frequency of service vehicles at property (such as house cleaners, pool cleaners, gardeners, tennis court maintenance, window cleaners, laundry services).**
11. **Implement infringements to property owners for breaches of approval conditions.**
12. **Some neighbourhoods become "tourist ghettos" where local residents' amenity is negatively impacted by badly behaved visitors.**
13. **In some local governments some Councillors may not work towards enforcing implementation of the scheme due to friendships and interests.**
14. **Residents and ratepayers may complain for years to Councillors and local government administrations about their neighbours' illegal short stay accommodation operations, yet local governments may not use their best endeavours to obtain evidence (such as copies of guests' receipts, website advertisements and booking records, photographs) nor prosecute. This can result in financial loss to the neighbours and financial benefit to the illegal operators.**
15. **Protection should be provided to traditional hotels (high establishment and operation costs) by limiting number of short stay operations (low establishment and operation costs) in proximity to hotels in any locality.**
16. **Consider the impact of short stay accommodation operations in residential areas on the availability of long term (> 3 months) rentals and rent rates. Lack of availability of long term affordable rentals for locals.**
17. **Consider limiting the number of nights over year that a property can be let for short stay accommodation.**
18. **Regulation must ensure all short stay accommodation operators display current approval/authorisation documentation for their businesses on website and at premises.**
19. **Conditions of approval to operate short stay accommodation cannot be standard, as they will vary with locality.**
20. **Compliance processes must be clearly identified and well resourced.**

21. **Regular review (community/neighbour consultation) of approvals mandatory.**
22. **Define explicit tax implications of short stay businesses (including tax on income, tax on home when sold) and ensure tax obligations can be enforced.**
23. **Whilst State regulation is relevant, Local Government should implement schemes (that imbue residents' values) and receive additional income from short stay operators whose businesses place additional pressure on local facilities and amenity.**