

LGNSW Draft Submission to the Department of Planning & Environment – Short-term Holiday Letting (SHTL) Options Paper

November 2017

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1. Opening

Local Government NSW (LGNSW) is the peak body for local government in NSW, representing NSW general-purpose councils and associate members including special-purpose councils. LGNSW facilitates the development of an effective community based system of local government in the State.

LGNSW thanks the NSW Department of Planning and Environment (DP&E) for the opportunity to make a submission to the *Options Paper on Short-term Holiday Letting (STHL)*. LGNSW made a submission in 2015 and provided verbal evidence to the NSW Parliament's Legislative Assembly Committee on Environment and Planning inquiry on the *Adequacy of regulation of short-term holiday letting in New South Wales* (the Parliamentary Inquiry). The issue is of interest to a significant number of councils, as evidenced by the 28 submissions from councils to the Parliamentary Inquiry.

STHL features in a variety of settings across NSW – the central business district and suburban areas in Sydney, rural and regional cities and towns, and coastal locations in both metropolitan and non-metropolitan areas.

There are a range of views on STHL among councils. LGNSW has sought to reflect the position of local government sector-wide. This submission has been informed by: consideration of councils' input to the Parliamentary Inquiry (submissions and representations at the Public Hearings); a member survey¹ to get councils' views on the importance of STHL in their area; as well as informal consultation with council planning officers.

LGNSW's 2015 submission to the Parliamentary Inquiry highlighted the diversity of views among councils across the state about the significance of STHL and how it should be managed. Our submission reflected our adopted policy position², calling for clearer rules regarding short-term rentals which can be effectively and efficiently enforced by councils through their LEPs. To this end, we recommended a review of definitions in the Standard Instrument LEP Template.

The main focus of this submission is on local government roles and responsibilities in managing STHL. Part 2 makes some general comments and observations about STHL, including a summary of key principles for deciding on an appropriate regulatory framework for STHL. Part 3 addresses the content of the Options Paper, including some comments on defining STHL, and a response to each of the four regulatory approaches proposed in the Options Paper (i.e. industry self-regulation, planning regulation, registration and strata property controls).

This submission is in draft form until it is considered by the LGNSW Board. Any revisions made by the Board at that time will be forwarded in the form of an updated submission.

¹ LGNSW received 59 responses from a cross-section of mayors, general managers, senior planning and tourism/economic development staff from metropolitan and non-metropolitan councils, both large and small.

² Adopted at the 2015 LGNSW Annual Conference

2. General Comments

a) Short-term accommodation is not new

Various forms of short-term accommodation have existed across NSW for many years, generally falling under the umbrella of ‘tourist and visitor accommodation’³.

In many locations, particularly outside metropolitan Sydney, the ebb and flow of short-term accommodation is an integral part of the community’s experience and an important factor in local or regional economic activity. Generally these communities support short-term accommodation and the debate is more around the management of these uses, so that they do not adversely affect the resident population.

It is the recent and rapid popularity of short-term letting in residential zones – made possible by the growth of on-line platforms - which has tended to blur the boundary between some of the more traditional commercial operators/businesses and this emerging and expanding accommodation market. Potential conflicts arise because properties within residential zones are being used for STHL, which do not generally permit ‘tourist and visitor accommodation’.

LGNSW recognises that the focus of the Options Paper is largely on accommodation that falls outside the traditional forms of ‘tourist and visitor accommodation’. The Options Paper identifies four forms of STHL in NSW⁴:

- Rental of one or more rooms (including room sharing) with the host present;
- Rental of a whole dwelling (principal residence) with the host away;
- Rental of a holiday dwelling (non-principal residence) with the host away; and
- Rental of a dwelling solely reserved for STHL.

It is important that regulation of these forms of short-term letting is considered within a holistic context, to ensure a fair and balanced approach to all the relevant regulatory issues (e.g. planning/building regulations, safety, insurance etc.).

b) Metropolitan and non-metropolitan differences

Across NSW, the significance and value of short-term letting varies. As indicated in our submission to the Parliamentary Inquiry, councils’ involvement and interest in this issue also varies considerably, depending on whether their area is popular as a tourist destination and whether residents are generally supportive of tourism or not.

STHL is an important part of the local economy for many councils. In the absence of any clear and consistent regulation, and in the face of various court decisions, some councils have had to act to amend their local environmental plans (LEPs). The Parliamentary Committee included in its final report a summary of recent provisions in LEPs⁵. Others have put their amendments on hold, pending the Parliamentary Inquiry and the subsequent Options Paper from the NSW Government.

The importance and benefits of STHL to local economies was reflected in the responses to the LGNSW survey. About half the respondents rated the contribution of STHL to their area as either ‘very important’, ‘important’ or ‘somewhat important’ and about 12% said it was ‘not at all

³ For example: backpackers’ accommodation; bed and breakfasts; farm stay; hotels or motels; serviced apartments - as defined in the *Standard Instrument – Principal Local Environmental Plan*, Dictionary

⁴ DP&E, *Short-term holiday letting in NSW - Options Paper*, 2017, p 7

⁵ Legislative Assembly Committee on Environment and Planning, *Inquiry into the Adequacy of regulation of short-term holiday letting in NSW, Appendix 3*

important'. When asked 'Does STHL provide benefits to your area?', 64% of respondents said 'yes'. The top five highly ranked benefits were:

1. 'Increased spend on goods and services' (89%);
2. 'Additional/supplementary income for local residents who offer STHL accommodation' (76%);
3. 'Indirect/flow-on employment opportunities through the wider visitor economy (51%)
4. 'Increased length of visitor stays' (49%); and
5. Enhanced viability of local business' (41%).

For this reason, LGNSW is not advocating over-regulation that could stifle the benefits of STHL to local economies. Rather, as emphasised in our submission to the Parliamentary Inquiry, and again by LGNSW's Chief Executive at the Public Hearing, we need some clarity:

In our view, it is absolutely critical that the definitions become very clear so that we do not tie ourselves up in red tape and we do not find ourselves regulating and investigating complaints that are not necessary and that we focus on things that really matter. To the extent that this Committee can help in achieving some clarity across the State, that would be very useful.⁶

c) Guiding principles for a regulatory framework

In the same way that a wide range of stakeholders hold passionate and diverse opinions about STHL, opinions vary within the local government sector.

Despite this, some themes or 'principles' are evident within local government about:

- A balanced and practical approach – Clearer rules are needed about when planning approval is required, but at the same time local government does not support having an overly burdensome regulatory framework. There appears to be general support from all stakeholders for the general principle that those STHL uses considered to be small scale would not require approval. Such an approach will require agreement on what constitutes 'small scale' i.e. what are the thresholds.
- Flexibility – While having a consistent definition will assist all stakeholders, councils also need the regulatory framework to be flexible to adapt to the local situation because of the wide variation in the use, application and impacts of STHL in different locations across NSW.
- Simplicity – There is broad agreement in local government that we do not want to further complicate planning processes and pathways for this form of short-term accommodation. In our view, it is critical that the definitions become very clear so that councils can focus on the things that really matter and do not get tied up in 'red tape' and having to regulate and investigate unnecessary complaints.
- Protection of residential amenity – An outcome of the regulatory framework for STHL must be to have measures in place to enable regulators to act to protect residential amenity.
- 'Blended' regulation – A combination of industry and government regulation, rather than self-regulation alone – is generally preferred.

⁶ Report of Proceedings before Committee on Environment and Planning Inquiry into the *Adequacy of the Regulation of Short-Term Holiday Letting in NSW*, Sydney, 14 Mar 2016, p 5

- Responsibility for regulating – The view within local government is that while councils have a role in the planning regulation side of things, state government (not councils) is responsible for regulation/registration of STHL as a business. It would be more efficient to have a state wide registration system. This would also provide a greater level of consistency for STHL operators.
- Registration - The view within local government is that there is a need for a registration system of some sort. The majority of respondents to our member survey agreed that STHL should be registered, although this should not be onerous.
- Fairness - Whoever benefits from the activity should pay the reasonable costs of regulating it, whatever form that ultimately takes. A constant theme in local government is in relation to cost shifting and the burden of regulation that imposes additional responsibilities without additional funding to cover these costs. LGNSW maintains that a small fee paid by operators to register their property would be a small price to pay to provide councils and state agencies with more accurate information to assist them with ensuring compliance.

d) Regulation and compliance – the burden of proof

It is a common experience of councils that investigations into alleged unauthorised use of a property for short-term letting can be resource-intensive and time consuming, which may affect other possibly more important regulatory activities. The burden of proof required for successful prosecution of possible unauthorised short-term accommodation is often too high to justify proceeding in a cost effective way. The council must determine whether or not the particular use is unauthorised, having regard to the relevant planning controls for the site. This process requires council officers to investigate the particular nature, scale and scope of the occupancy and obtain evidence accordingly.

The Parliamentary Committee concluded that short-term letting is “generally a low impact activity”⁷ but that, when it “is managed badly, or when rogue operators take advantage of their neighbours, it is vital for councils to have tools available which they can use within limited budgets and staffing to respond quickly to complaints and achieve effective outcomes”⁸.

The challenge therefore is to have a framework which provides easy access to the relevant information to make investigating complaints more effective, but at the same time recognises the fact that in most cases state-wide, the quantum of complaints about STHL is small. A simple registration system would assist with providing easy access to the type of information regulators need to help them investigate complaints and make it easier to ensure compliance (for example, by the threat of removing non-compliant properties from on-line platforms).

e) More research needed

A number of councils have recommended that more research and information is needed to fully understand and measure the overall impact of STHL on the community, and the impacts/benefits of planning regulations where these have been in place for some time. This is consistent with the Parliamentary Inquiry’s recommendation that “the NSW Government implements a program to collect data on the holiday industry generally, and short-term letting in particular, to assess the economic contribution of short-term letting and its impact on housing affordability and community viability”⁹.

⁷ Legislative Assembly Committee on Environment and Planning, *Inquiry on the Adequacy of regulation of short-term holiday letting in NSW*, October 2016, p 4

⁸ *Ibid.*, p 6

⁹ *Ibid.*, p 11

LGNSW agrees with councils' views and supports the Inquiry's recommendation that further research and more data would assist evidence-based policy decisions. This suggests there is a need for ongoing monitoring once the regulatory framework is in place, to ensure the planning and other regulatory controls are working and potential impacts on the availability of and access to affordable housing are observed.

f) Other jurisdictions

This current review of short-term letting in NSW is well-timed to be able to learn from other overseas jurisdictions which have recently tightened regulations on STHL to address some emerging negative impacts. LGNSW recommends that in designing the policy and regulatory framework for managing STHL in NSW, the Government considers the actions of these other jurisdictions. This is a unique opportunity to put in place a balanced framework that will enable the tourism industry to grow, while safeguarding the interests of residents, councils and other traditional short-term accommodation providers.

3. Specific comments in response to Options Paper

a) Definition of STHL

There is universal support within local government for having a clear and consistent definition in the Standard LEP that distinguishes STHL from the more traditional meanings that already exist under the group term 'Tourist and Visitor Accommodation'. The difficulty with the current definitions is that the various forms of STHL that are occurring fall across a spectrum that includes 'bed and breakfast accommodation' and 'serviced apartment' as defined in the Standard Instrument LEP¹⁰.

Having a clear definition is crucial for planning regulation to be effective. A number of councils have amended their LEPs to distinguish STHL¹¹ and these can be used as a starting point for an agreed definition.

With a clear and consistent definition in place, flexibility is needed to allow councils to determine the *thresholds* such as length of stay and number of bedrooms that would determine whether STHL requires consent in their local area. As discussed later, this will vary, depending on the location and local community.

The use of the word 'holiday' in *Short-term Holiday Letting* implies that properties rented on a short-term basis are being used exclusively for 'holiday' accommodation. However, evidence suggests that this type of rental accommodation is being offered for a number of purposes other than holiday rental¹². It is considered that the use of the term *Short-term Letting*, *Short-*

¹⁰In the Dictionary of the Standard Instrument LEP:

'bed and breakfast accommodation' means an existing dwelling in which temporary or short-term accommodation is provided on a commercial basis by the permanent residents of the dwelling and where:

- (a) meals are provided for guests only, and
- (b) cooking facilities for the preparation of meals are not provided within guests' rooms, and
- (c) dormitory-style accommodation is not provided.

'serviced apartment' means a building (or part of a building) providing self-contained accommodation to tourists or visitors on a commercial basis and that is regularly serviced or cleaned by the owner or manager of the building or part of the building or the owner's or manager's agents.

¹¹ For example: Pittwater LEP, Shoalhaven LEP, Gosford LEP

¹² About half the respondents to the LGNSW member survey indicated that the main reason visitors to their area use short-term letting is for holiday rental. However, respondents also indicated that business travel and seasonal or contract work were other reasons that visitors to their areas use STHL.

term Rental Accommodation or Short-term Visitor Accommodation would be a more accurate description.

The Options Paper notes that “councils variously define ‘short-term’ as 45, 60 or 90 consecutive days. Others do not include a length of stay in their definition of STHL”¹³.

It is recommended that the DP&E establish a small working group of councils (with representation from both metropolitan and non-metropolitan areas) to look at current definitions and propose a suitable and workable definition, along with other necessary changes to existing definitions¹⁴. Things to consider are:

- Reference to the word ‘holiday’ should be removed from the definition;
- The definition should sit under the group term of ‘tourist and visitor accommodation’; and
- Distinguish this type of short-term accommodation from ‘bed and breakfast’, ‘serviced apartments and other forms of ‘tourist and visitor accommodation’.

Recommendation:

- 1 *LGNSW supports the introduction of a definition to specifically cover STHL and distinguish it from other forms of tourist and visitor accommodation. It is recommended that the DP&E establish a small working group of councils (with representation from both metropolitan and non-metropolitan areas) to look at current definitions and propose a suitable and workable definition, along with other necessary changes to existing definitions.*

b) Industry Self-regulation

Digital platforms must be part of the solution for improved management and operation of STHL, however many councils are not confident that self-regulation alone will be sufficient to effectively manage problems associated with STHL.¹⁵

Unquestionably, there is scope to enhance industry self-regulation in this area. Industry self-regulation will be most effective if it forms part of an overall NSW Government framework that includes registration, monitoring, handling complaints and issuing penalties. LGNSW believes that combined with a simple government operated and industry funded registration system to support a regulatory framework, a strengthened Code of Conduct would help put in place better complaint management mechanisms, enable non-compliant properties to be more easily removed from on-line platforms, and facilitate monitoring and reporting of the STHL industry.

Recommendation:

- 2 *LGNSW does not believe that self-regulation alone is sufficient to effectively manage STHL. LGNSW recommends that self-regulation be enhanced with a strengthened Code of Conduct, in combination with an overall NSW Government framework that includes registration, monitoring, handling complaints and issuing penalties.*

¹³ DP&E, *Short-term holiday letting in NSW - Options Paper*, 2017, p 19

¹⁴ For example, as recommended in LGNSW’s submission to the Parliamentary Inquiry, the definitions of ‘dwelling house’ and ‘bed and breakfast’ may need to be amended to provide clarity. (November 2015, p 5)

¹⁵ The LGNSW survey yielded a range of responses to the question of whether industry self-regulation would be effective. One-third of respondents said they did not consider that industry self-regulation would be effective, while just under one-quarter (24%) considered it would be effective. Another 20% were ‘unsure’ and about 24% said ‘it depends’.

c) Regulation through the planning system

According to the findings of the Parliamentary Inquiry, there is broad support among stakeholders for the principle that STHL uses that are considered to be low impact should not require development approval. Equally, there are certain circumstances where STHL should require development consent. The debate is around where the line should be drawn.

Relevant factors to consider here include:

- The number of days and times per year the property is used for STHL;
- Whether it is a strata or non-strata property;
- Whether it is a principal place of residence;
- Number of bedrooms;
- Whether a host is present; and
- Local community views about permissible uses in residential zones.

It is important to recognise that circumstances vary from location to location and that across NSW, one size does not necessarily fit all. Ultimately, the desired outcome in any local situation is that STHL does not interfere with neighbourhood/residential amenity and there are provisions available in the planning framework to enable regulators to take action if warranted (for example, as adopted by Shoalhaven Council in its LEP 2014¹⁶).

The Options Paper discusses a number of ‘triggers’ that could determine the level of planning regulation¹⁷. These are discussed below.

- Length of stay (days per stay or days per year)

Triggers on the length of stay are considered necessary to determine what planning approval may be required for STHL (i.e. whether the use of a property for STHL should be exempt development or require development consent). Crucially, the rise of STHL via on-line platforms has highlighted the important and often subtle distinctions between ‘long-term and short-term’ and ‘commercial and non-commercial’. Using a tally of ‘consecutive’ and ‘non-consecutive’ days per year for the use of a property for STHL is an important tool that some councils have used, although the thresholds vary between councils. These variations reflect the important differences between local circumstances.

Councils and their communities need flexibility to decide the thresholds around maximum number of days, bedrooms, length of stay. This should be reflected in councils’ planning instruments (LEPs and DCPs) and decided through a community consultation process.

Councils are best positioned to decide how they will regulate STHL with the planning system, because the local characteristics and impacts will vary. It is also important that councils are able to consult their communities to get local buy-in to these controls. Without this flexibility councils may not be able to achieve the best planning outcomes for local communities.

Accordingly, the Standard Instrument should provide for councils to determine the thresholds regarding length of stay and number of bedrooms that would determine whether STHL required consent.

As discussed earlier in this submission, councils find it difficult from a compliance perspective to monitor length of stay, therefore having a registration system which captures this important information would greatly assist councils with compliance where required.

¹⁶ Shoalhaven LEP 2014, CI 7.13

¹⁷ DP&E, *Short-term holiday letting in NSW - Options Paper*, July 2017, p 19-20

- Number of bedrooms

Some councils require development consent for STHL properties with a large number of bedrooms (usually 5 or more), as a mechanism for addressing and managing potential amenity impacts. While it is recognised that this is not a guaranteed measure for limiting occupancy in these properties, it is a clear means of using the planning system to distinguish higher impact forms of short-term letting from low impact uses. Most councils appear to consider a 4-bedroom limit to be a reasonable trigger in this regard, but again the actual threshold number could be determined locally.

- Presence of hosts

The presence of a host is arguably the most effective control for limiting amenity impacts. LGNSW supports any proposal for STHL where a host is present to be exempted, however before a blanket exemption is applied, LGNSW would question whether certain restrictions/parameters should also be placed on frequency of letting (i.e. number of days and times per year) and on number of bedrooms.

Recommendation:

- 3 *LGNSW supports the use of planning regulation as one of a number of tools to manage STHL. Impact should be determined depending on length of stay (occasions and days) and number of bedrooms. LGNSW agrees that STHL uses that are considered to be low impact should not require development approval, however if exceeding the specific length-of-stay and number-of-bedrooms thresholds STHL should require development consent unless a host is present. The specific thresholds should be decided by the council in consultation with its local community.*

d) Registration of SHTL

LGNSW supports having a simple registration system that is operated by the NSW Government and funded by the industry (through registration fees). This does not need to be onerous or costly. The registration system recently introduced in San Francisco provides one example.¹⁸

The benefit of a registration system from councils' point of view is that it would provide important information to make it easier for councils to exercise and enforce planning controls. Having a requirement to register STHL properties would also facilitate ongoing monitoring and empower the industry's Code of Conduct by making it easier for penalties to be applied to bad operators and in severe cases, for registration to be revoked.

Recommendation:

- 4 *LGNSW supports having a simple registration system that is operated by the NSW Government and funded by registration fees. Registration would serve the dual purpose of making information available to assist compliance and enforcement; and also as a disciplinary tool where non-compliant properties can be easily removed from on-line platforms.*

¹⁸ <https://www.airbnb.com.au/help/article/1849/san-francisco-s-registration-process--frequently-asked-questions>

e) SHTL in strata properties

LGNSW and councils agree with the finding in the Parliamentary Inquiry that “strata properties present a special case when compared with detached housing”¹⁹.

Where dwellings are used for short-term lettings in residential flat buildings, councils find that the impacts on strata residents tend to be amplified. However, councils do not always find it easy to gather evidence about the use of these dwellings for short-term letting, which makes it challenging to address complaints effectively.

Most councils agree there is merit in allowing owners’ corporations to establish by-laws that would assist in minimising the potential negative impacts of STHL. By-laws could include management of visitor behaviour, limiting the number of guests per bedroom, limiting the number of visitors the guests may have at any time at the STHL premises, applying (reasonable) additional strata fees to owners who make their dwellings available for STHL, and being able to seek compensation or issue fines for property damage or breaches of by-laws.

There is less support among councils for enabling owners’ corporations to prohibit SHTL outright. Having said that, councils would like to see an effective, efficient and properly resourced complaint mechanism in place for the owners’ corporation to report and remedy problems. It would be also appropriate to have provisions in place to allow registration for that STHL operator to be revoked in the event of consistent and/or serious breaches.

If a robust framework for registration, monitoring, handling complaints and issuing penalties was put in place, along with stronger self-regulation, this would go a long way to help manage the impacts of STHL on strata residents. Implementing an appropriate complaint resolution framework would assist in reducing complaints which come to councils.

Recommendation:

- 5 *LGNSW supports proposals to allow owners’ corporations to establish by-laws that would assist in minimising the potential negative impacts of STHL.*

f) Potential impacts on affordable housing associated with STHL

Some councils have raised concerns that both housing affordability and availability may be affected by STHL, however they also acknowledge that there is an absence of data to support these anecdotal concerns. LGNSW supports the recommendation of the Parliamentary Inquiry that the NSW Government initiate data collection to assess the economic contribution of short-term letting and its impact on housing affordability and community viability²⁰.

A recent University of Sydney study estimated that potentially 6,000 homes have been taken out of Sydney’s permanent rental housing market as landlords list properties on home-sharing websites such as Airbnb.²¹ Internationally, concerns about the potential influence of on-line platforms on the availability of affordable housing have been a factor in some overseas

¹⁹ DP&E, *Short-term holiday letting in NSW - Options Paper*, July 2017, p 18

²⁰ Legislative Assembly Committee on Environment and Planning, *Inquiry on the Adequacy of regulation of short-term holiday letting in NSW*, October 2016, p 11

²¹ *Sydney Morning Herald*, ‘Housing affordability: 6000 homes removed from rental market as landlords turn to Airbnb’, 21 August 2017

jurisdictions introducing tighter regulations and registration/licensing frameworks for short-term letting.

4. Conclusion

STHL provides a complex mix of benefits and costs, harmony and conflicts in different locations across the state. It has created a good deal of debate in recent years, but it is universally agreed that clarity and certainty is urgently needed, for the benefit of all parties – providers/hosts, guests/users, local residents/neighbours, property owners/investors, commercial accommodation providers, tourist industry operators, digital platforms, councils and other regulators.

The absence of clear guidance about how to manage STHL has been challenging for some councils. STHL is currently regulated in a piecemeal manner through the planning system and there are mixed views in local government across the state about the extent to which it should be regulated. Nevertheless, what councils do agree on is that a clear definition is needed and flexibility needs to be built in so that councils, in consultation with their communities, can tailor the planning controls to their local circumstances.

A number of councils have identified and acted to regulate STHL through specific policies and amendments to their LEPs. Some have put proposed amendments on hold, pending the outcome of the NSW Government's current review and Options Paper. For other councils, STHL has little prominence in their local area at all. LGNSW has sought to reflect the range of views of our members in this submission.

LGNSW considers that the best approach to manage STHL is a combination of government regulation and improved self-regulation provided such regulation is not onerous for users and regulators alike. In summary, this submission advocates for implementation of a practical, fair and balanced framework for the managing STHL, through a combination of measures which include: planning regulation, registration, stronger self-regulation, and clearer strata laws.

Overall, local government has welcomed the Options Paper, and in the interests of all parties, LGNSW encourages the DP&E to proceed quickly and prudently, in consultation with LGNSW and relevant councils, to put in place a robust policy and regulatory framework to manage short-term letting effectively in the future.

Summary of recommendations

- 1 *LGNSW supports the introduction of a definition to specifically cover STHL and distinguish it from other forms of tourist and visitor accommodation. It is recommended that the DP&E establish a small working group of councils (with representation from both metropolitan and non-metropolitan areas) to look at current definitions and propose a suitable and workable definition, along with other necessary changes to existing definitions.*
- 2 *LGNSW does not believe that self-regulation alone is sufficient to effectively manage STHL. LGNSW recommends that self-regulation be enhanced with a strengthened Code of Conduct, in combination with an overall NSW Government framework that includes registration, monitoring, handling complaints and issuing penalties.*
- 3 *LGNSW supports the use of planning regulation as one of a number of tools to manage STHL. Impact should be determined depending on length of stay (occasions and days) and number of bedrooms. LGNSW agrees that STHL uses that are considered to be low impact should not require development approval, however if exceeding the specific length-of-stay and number-of-bedrooms thresholds STHL should require development consent unless a host is present. The specific thresholds should be decided by the council in consultation with its local community.*
- 4 *LGNSW supports having a simple registration system that is operated by the NSW Government and funded by registration fees. Registration would serve the dual purpose of making information available to assist compliance and enforcement; and also as a disciplinary tool where non-compliant properties can be easily removed from on-line platforms.*
- 5 *LGNSW supports proposals to allow owners' corporations to establish by-laws that would assist in minimising the potential negative impacts of STHL.*