

16 October, 2022

Mayor Michael Lyon  
BYRON SHIRE COUNCIL  
[REDACTED] Byron Bay

Dear Mayor Lyon

**Re: Submission Proposed 90 Day Cap per annum to Short Term Rental Accommodation**

I understand the policy objective of this change in regulation is the following.

“This is about returning properties in key residential areas to the long-term letting pool by setting caps on how many days properties will be able to be rented out for holiday accommodation,” Mayor Lyon said. In addition, I understand that as part of this objective that increased rental accommodation would support a reduction in homelessness in Byron Bay.

**1. Lack of Transparent Economic Modelling**

I note that there is no economic modelling published on the Council website to review that supports this proposed regulation so it is difficult to understand how this regulation will achieve the desired objective without understand the economic modelling assumptions that are driving the proposed changes. Good public policy formation should be based on a thorough, transparent assessment of the potential impact(s) of various decisions and a review of all alternative options.

In addition new regulation should be prospective and not punitively disadvantage a significant cohort of investors who have made an informed decision over many years to support the local economy and invest significant capital in Byron Bay. Any ill informed regulation is likely to direct future capital investment to regions that welcome the investment and the subsequent economic activity and increased living standards that come from that investment

**2. Reduction in Economic Growth for the Town and Region**

Byron Bay's primary industry is tourism and the economic ecosystem that supports the tourism industry (restaurants, cafes, retail, sports/leisure, cleaning, gardening, linen, other general trades). Holding all other variables the same, such as Byron's major events strategy, and punitively restricting supply of (short term rental) accommodation this proposed regulation is likely to cause a combination of a holiday accommodation price increase (with price spikes at peak periods) and a shift in demand to alternative substitute holiday locations (domestically and internationally). The impact therefore will likely be to reduce economic activity, employment and wealth for the Byron community, including a reduction in rates and taxes collected by the Council. It will also be increasingly difficult to encourage a suitable workforce to the town that is happy to be available to work around peak demand periods of the year. Money being directed to alternative substitute locations will also drive down employment opportunities and the general economic conditions for the community.

### **3. Unintended Consequences of Poor Public Policy/Regulation**

It is also worth noting that poor public policy decisions generally create an unregulated market that seeks to maneuver or work around such regulation. With this proposal it is hard to see how there will not be an increase in unregulated holiday letting where friends and family of owners or their friends of friends 'rent' directly from owners and pay a 'wholesale' or 'mates rates' rental accommodation to owners. Much of this money will be untaxed as part of the 'black economy'. Has this likely outcome been factored into the economic modelling?

### **4. Illogical Geographic Boundary**

Another puzzling aspect to this proposed regulation is the lack of transparency regarding the geographic application for the 90 day cap. The whole of the greater Byron township is tourism centric so it seems illogical to apply the inclusion zone the way it has been proposed. There needs to be greater consultation and explanation as to why the proposed boundary has been drawn.

## **5. Supporting Evidence**

To support my hypothesis on the impact of this proposed regulation I can advise that my wife and I are fortunate to own two properties, one of which is owned by our self managed superannuation fund. Currently the properties are rented for approximately 150 days each. The non peak or shoulder periods are rented at approximately \$800 per night, so under this proposed regulation we would have a rental income deduction of approximately K\$50 per house per year (150 days - 90 days x \$800). Our costs (cleaning, maintenance, agents, linen etc) are approximately 60% of income. In net terms per house we will therefore be K\$20 per house worse off. To offset this net income reduction we will however increase our price at peak periods by 10-20%. The price increase will therefore offset most of our net income decrease.

The impact on our trades and 'support crew' however will be to reduce their income and that income reduction will obviously impact the restaurants, leisure and retail businesses with a drop in demand because of the decrease in volume of renters (120 day reduction in rent = approximately 30 groups across a year for just our 2 properties). Has the spending that these 30 groups bring into the town's businesses been factored into the economic assessment modelling?

These two properties will not be added to the long term rental pool because:-

(a) we use them 3-4 times a year ourselves (family and friends); and

(b) the long term rental market does not support the price required when compared renting the properties for 90+ days per year. As stated above the Byron economy is centred around tourism; the workforce for this industry does not earn the required income to pay the rent for most of these short term rental properties.

## **6. Conclusion**

In conclusion it is difficult to see how this regulation will achieve the stated objective because of the reasons highlighted above. I look forward to receiving your response on the points raised.

SINCERELY,

MICHAEL MCCONNELL

26 October, 2022

Mayor Michael Lyon  
BYRON SHIRE COUNCIL  
[REDACTED] Byron Bay

Dear Mayor Lyon

Re: Submission Proposed 90 Day Cap per annum to Short Term Rental Accommodation

I understand the policy objective of this change in regulation is the following.

“This is about returning properties in key residential areas to the long-term letting pool by setting caps on how many days properties will be able to be rented out for holiday accommodation,” Mayor Lyon said. In addition, I understand that as part of this objective that increased rental accommodation would support a reduction in homelessness in Byron Bay.

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2. Reduction in Economic Growth for the Town and Region

Byron Bay's primary industry is tourism and the economic ecosystem that supports the tourism industry (restaurants, cafes, retail, sports/leisure, cleaning, gardening, linen, other general trades). Holding all other variables the same, such as Byron's major events strategy, and punitively restricting supply of (short term rental) accommodation this proposed regulation is likely to cause a combination of a holiday accommodation price increase (with price spikes at peak periods) and a shift in demand to alternative substitute holiday locations (domestically and internationally). The impact therefore will likely be to reduce economic activity, employment and wealth for the Byron community, including a reduction in rates and taxes collected by the Council. It will also be increasingly difficult to encourage a suitable workforce to the town that is happy to be available to work around peak demand periods of the year. Money being directed to alternative substitute locations will also drive down employment opportunities and the general economic conditions for the community.

3. Unintended Consequences of Poor Public Policy/Regulation

It is also worth noting that poor public policy decisions generally create an unregulated market that seeks to manoeuvre or work around such regulation. With this proposal it is hard to see how there will not be an increase in unregulated holiday letting where friends

and family of owners or their friends of friends 'rent' directly from owners and pay a 'wholesale' or 'mates rates' rental accommodation to owners. Much of this money will be untaxed as part of the 'black economy'. Has this likely outcome been factored into the economic modelling?

#### 4. Illogical Geographic Boundary

Another puzzling aspect to this proposed regulation is the lack of transparency regarding the geographic application for the 90 day cap. The whole of the greater Byron township is tourism centric so it seems illogical to apply the inclusion zone the way it has been proposed. There needs to be greater consultation and explanation as to why the proposed boundary has been drawn.

#### 5. Supporting Evidence

I am a rate payer and owner and will not be adding my properties to the long term rental pool because:-

- (a) we use them frequently throughout the year
- (b) the long term rental market does not support the price required when compared renting the properties for 90+ days per year. As stated above the Byron economy is centred around tourism; the workforce for this industry does not earn the required income to pay the rent for most of these short term rental properties.

#### 6. Conclusion

In conclusion it is difficult to see how this regulation will achieve the stated objective because of the reasons highlighted above.

Kind Regards

Rebecca Prodger

Owner of [REDACTED], Byron Bay NSW

# Short-Term Rental Accommodation Planning Proposal Submission Form



Submission date: 26 October 2022, 2:08PM  
 Receipt number: STRAPP659  
 Related form version: 6

First name: Suzie

Surname name: Bradley

Organisation:

Email:

Your comments:

Dear Mayor Lyon,

Re: Submission Proposed 90 Day Cap per annum to Short Term Rental Accommodation

I understand the policy objective of this change in regulation is the following.

“This is about returning properties in key residential areas to the long-term letting pool by setting caps on how many days properties will be able to be rented out for holiday accommodation,” Mayor Lyon said. In addition, I understand that as part of this objective that increased rental accommodation would support a reduction in homelessness in Byron Bay.

## 1. Lack of Transparent Economic Modelling

I note that there is no economic modelling published on the Council website to review that supports this proposed regulation so it is difficult to understand how this regulation will achieve the desired objective without understand the economic modelling assumptions that are driving the proposed changes. Good public policy formation should be based on a thorough, transparent assessment of the

potential impact(s) of various decisions and a review of all alternative options.

In addition new regulation should be prospective and not punitively disadvantage a significant cohort of investors who have made an informed decision over many years to support the local economy and invest significant capital in Byron Bay. Any ill informed regulation is likely to direct future capital investment to regions that welcome the investment and the subsequent economic activity and increased living standards that come from that investment

## 2. Reduction in Economic Growth for the Town and Region

Byron Bay's primary industry is tourism and the economic ecosystem that supports the tourism industry (restaurants, cafes, retail, sports/leisure, cleaning, gardening, linen, other general trades). Holding all other variables the same, such as Byron's major events strategy, and punitively restricting supply of (short term rental) accommodation this proposed regulation is likely to cause a combination of a holiday accommodation price increase (with price spikes at peak periods) and a shift in demand to alternative substitute holiday locations (domestically and internationally). The impact therefore will likely be to reduce economic activity, employment and wealth for the Byron community, including a reduction in rates and taxes collected by the Council. It will also be increasingly difficult to encourage a suitable workforce to the town that is happy to be available to work around peak demand periods of the year. Money being directed to alternative substitute locations will also drive down employment opportunities and the general economic conditions for the community.

## 3. Unintended Consequences of Poor Public Policy/Regulation

It is also worth noting that poor public policy decisions



generally create an unregulated market that seeks to manoeuvre or work around such regulation. With this proposal it is hard to see how there will not be an increase in unregulated holiday letting where friends and family of owners or their friends of friends 'rent' directly from owners and pay a 'wholesale' or 'mates rates' rental accommodation to owners. Much of this money will be untaxed as part of the 'black economy'. Has this likely outcome been factored into the economic modelling?

#### 4. Illogical Geographic Boundary

Another puzzling aspect to this proposed regulation is the lack of transparency regarding the geographic application for the 90 day cap. The whole of the greater Byron township is tourism centric so it seems illogical to apply the inclusion zone the way it has been proposed. There needs to be greater consultation and explanation as to why the proposed boundary has been drawn.

5. I am a recipient and have a business that relies on holiday letting. The properties we work on will not be returned to the local holiday letting rental pool because:-

(a) Owners use the properties frequently throughout the year

(b) the long term rental market does not support the price required when compared renting the properties for 90+ days per year. As stated above the Byron economy is centred around tourism; the workforce for this industry does not earn the required income to pay the rent for most of these short term rental properties.

#### 6. Conclusion

**In conclusion it is difficult to see how this regulation will achieve the stated objective because of the reasons highlighted above. In fact I have grave concerns that holidaying will become an elite pursuit in Byron with the cost of rental increasing due to lack of supply and many homes will be left empty for owner use only. No doubt unemployment will rise as many businesses will not be able to operate. I have serious concerns for our business and those that we employ. This policy simply will not contribute to more affordable housing.**

Supporting information

16 October, 2022

Mayor Michael Lyon  
BYRON SHIRE COUNCIL  
[REDACTED] Byron Bay

Dear Mayor Lyon

Re: Submission Proposed 90 Day Cap per annum to Short Term Rental Accommodation

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family of owners or their friends of friends 'rent' directly from owners and pay a 'wholesale' or 'mates rates' rental accommodation to owners. Much of this money will be untaxed as part of the 'black economy'. Has this likely outcome been factored into the economic modelling?

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Another puzzling aspect to this proposed regulation is the lack of transparency regarding the geographic application for the 90 day cap. The whole of the greater Byron township is tourism centric so it seems illogical to apply the inclusion zone the way it has been proposed. There needs to be greater consultation and explanation as to why the proposed boundary has been drawn.

#### 5. Supporting Evidence

I am a rate payer and owner and will not be adding my properties to the long term rental pool because:-

- (a) we use them frequently throughout the year
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#### 6. Conclusion

In conclusion it is difficult to see how this regulation will achieve the stated objective because of the reasons highlighted above.

Steven Abbott

27 October, 2022

Mayor Michael Lyon  
BYRON SHIRE COUNCIL  
[REDACTED] Byron Bay

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Leanne Kakos

16 October, 2022

Mayor Michael Lyon  
BYRON SHIRE COUNCIL  
[REDACTED] Byron Bay

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#### 6. Conclusion

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Andrew Mitchelmore



# Short-Term Rental Accommodation Planning Proposal Submission Form



Submission date: 31 October 2022, 2:09PM  
Receipt number: STRAPP748  
Related form version: 6

First name: Debra  
Surname name: Summons  
Organisation: East Coast Escapes

Email:

Your comments:

31 October, 2022

Mayor Michael Lyon  
BYRON SHIRE COUNCIL

Dear Mayor Lyon

Re: Submission Proposed 90 Day Cap per annum to Short Term Rental Accommodation

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outcome been factored into the economic modelling?

#### 4. Illogical Geographic Boundary

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5. We are a holiday letting business made up of local community members and employ local predominately vulnerable females. The properties we manage will not be returned to the local holiday letting rental pool because:-

- (a) Our owners use the properties frequently throughout the year
- (b) the long term rental market does not support the price required when compared renting the properties for 90+ days per year. As stated above the Byron economy is centred around tourism; the workforce for this industry does not earn the required income to pay the rent for most of these short term rental properties.

#### 6. Conclusion

In conclusion it is difficult to see how this regulation will achieve the stated objective because of the reasons highlighted above. In fact we have grave concerns that holidaying will become an elite pursuit in Byron with the cost of rental increasing due to lack of supply and many homes will be left empty for owner use only. No doubt unemployment will rise as many businesses will not be able to operate. We have serious concerns for our business and those that we employ. This policy simply will not contribute to more affordable housing.

# Short-Term Rental Accommodation Planning Proposal Submission Form



Submission date: **31 October 2022, 3:20PM**  
Receipt number: **STRAPP751**  
Related form version: **6**

First name **Lynette**

Surname name **Fardon**

Organisation

Email

Your comments

**\*I agree with the State Government's 180 days holiday rental policy for non hosted properties.**

**\*I don't agree with reducing it to 90 days.**

**\*I agree with the areas selected to have 365 days as holiday rental. These areas have always been areas where people have holiday homes or come to for a holiday.**

**As most permanent tenants own their own furniture etc.**

**Many fully furnished holiday apartments/homes don't suit permanent tenants. The owners of holiday houses like to use their holiday home themselves for their own holidays, again fully set up to walk in and have a holiday.**

**It makes perfect sense to rent them out to other holiday makers when vacant.**

**It's a big expectation to ask permanent renters to 'leave' in holiday times.**

**I feel this only adds to a already big problem.**

**To cover Land Tax and Council's high rates these holiday properties need to be rented out when not in use by the owners. If the proposed 90 days cap is introduced I feel these properties would remain vacant longer than necessary.**

Supporting information

# Short-Term Rental Accommodation Planning Proposal Submission Form



Submission date: 31 October 2022, 3:23PM  
Receipt number: STRAPP754  
Related form version: 6

First name Gary

Surname name Fardon

Organisation

Email

Your comments

**\*I agree with the State Government's 180 days holiday rental policy for non hosted properties.**

**\*I don't agree with reducing it to 90 days.**

**\*I agree with the areas selected to have 365 days as holiday rental. These areas have always been areas where people have holiday homes or come to for a holiday.**

**As most permanent tenants own their own furniture etc. Many fully furnished holiday apartments/homes don't suit permanent tenants. The owners of holiday houses like to use their holiday home themselves for their own holidays, again fully set up to walk in and have a holiday.**

**It makes perfect sense to rent them out to other holiday makers when vacant.**

**It's a big expectation to ask permanent renters to 'leave' in holiday times.**

**I feel this only adds to a already big problem.**

**To cover Land Tax and Council's high rates these holiday properties need to be rented out when not in use by the owners. If the proposed 90 days cap is introduced I feel these properties would remain vacant longer than necessary.**

Supporting information

# Short-Term Rental Accommodation Planning Proposal Submission Form



Submission date: 31 October 2022, 3:26PM  
Receipt number: STRAPP755  
Related form version: 6

First name: Ava  
Surname name: Belle

Organisation:

Email:

Your comments:

**\*I agree with the State Government's 180 days holiday rental policy for non hosted properties.**  
**\*I don't agree with reducing it to 90 days.**  
**\*I agree with the areas selected to have 365 days as holiday rental. These areas have always been areas where people have holiday homes or come to for a holiday.**  
**As most permanent tenants own their own furniture etc. Many fully furnished holiday apartments/homes don't suit permanent tenants. The owners of holiday houses like to use their holiday home themselves for their own holidays, again fully set up to walk in and have a holiday.**  
**It makes perfect sense to rent them out to other holiday makers when vacant.**  
**It's a big expectation to ask permanent renters to 'leave' in holiday times.**  
**I feel this only adds to a already big problem.**  
**To cover Land Tax and Council's high rates these holiday properties need to be rented out when not in use by the owners. If the proposed 90 days cap is introduced I feel these properties would remain vacant longer than necessary.**

Supporting information: